



Child Welfare Policies & Procedures

Document Management

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Revisions

	Name	Designation	Date
Revision 1	Jess Kay	Head of Production/Child Safety Officer	01/05/2025
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Scope

This policy applies to all Talentpay staff, contractors, and volunteers, and external production stakeholders including all cast and crew on any production.

Statement of Commitment

Talentpay is committed to the rights of all children to feel safe and to be safe at all times at work. We recognise that some children, particularly those with a disability, from indigenous & other diverse cultural backgrounds, or who identify as LGBTQI are particularly vulnerable. We respect that cultural identity is fundamental to a child's safety and wellbeing, and commit to actively support, empower, and encourage Aboriginal children and children from diverse cultural backgrounds to participate and express their culture and identity without fear of retribution or questioning.

On any production where children are engaged, Talentpay will:

- Actively manage the risks of abuse, discrimination, or other safety concerns, including ensuring all productions are compliant with child welfare and employment standards throughout Australia, including the National Principles for Child Safety, or Victorian Child Safe Standards for Victoria-based productions.
- Ensure that every child engaged in a production is treated with respect and dignity and will be safe and protected from child abuse, bullying, harassment or discrimination. Everyone involved must be aware of their legal responsibilities related to the welfare of children, as well as the Talentpay standards of behaviour expected of them, as laid out in our Code of Conduct (Appendix A).
- Maintain a standard of zero tolerance for child abuse, bullying, and discrimination based on race, religion, language spoken, gender, sexuality, or physical or mental ability. Talentpay has a responsibility to investigate any complaints or allegations of abuse, bullying, or discrimination in accordance with our Complaint Handling Framework.
- Assess and implement plans to minimise the specific risks on each production that involves children, in consultation with internal staff and external stakeholders, including children and their families. We are aware of the particular risks our industry faces when it comes to matters of privacy, wardrobe changing, performing on camera and being directed to perform, and we are conscious that employment is more taxing on children than on adults.
- Comply with applicable state and federal legislation.

Communication and Consultation

Identifying Children's Needs

When children are cast on a shoot, Talentpay will contact parents to request details of any specific accessibility or cultural needs when collecting the necessary pre-shoot paperwork for child employment. Where a parent advises such needs, Talentpay will coordinate with all parties involved with the production to ensure these are accommodated. Such accommodations may include, but are not limited to:

- Organising a translator to support the child on set
- Ensuring work locations are wheelchair accessible
- Providing a private space for prayers or sensory reprieve
- Communicating dietary restrictions to catering and food stylists
- Communicating relevant medical care needs to the production nurse or first aider
- Consulting with community leaders or disability advocates to ensure a sensitive and respectful work environment

No party in the workplace may ask a child to do, say, or wear anything that conflicts with their physical or cultural needs.

Child appropriate Resources

The following documents are to be provided to children prior to the commencement of employment, and copies are to be available on set during any employment activity:

- Child Safety For Kids
- Who Can I Talk To
- You Have The Right To Feel Safe

These documents are attached to this policy and are to be reviewed and updated alongside this policy if required.

Family/Community Involvement & Feedback

The Parent Handbook must be provided to parents prior to the commencement of employment. This document is attached to this policy and is to be reviewed and updated alongside this policy if required.

Talentpay's policies and procedures are subject to continuous review and improvement. Our Child Safe policy and procedures are developed with due consideration to feedback received from families, children, and agents on Talentpay productions, and with annual industry-wide consultation via anonymous survey distributed to agents and casting directors, which can be further circulated to parents and children, to capture their thoughts, feelings, and feedback on keeping children safe in the entertainment industry.

The HR Manager and Child Safety Officer are responsible for facilitating feedback and conducting surveys.

Complaints or reports of misconduct or abuse are to be handled in accordance with the *Talentpay Complaint Handling & Incident Reporting Policy*

Our People

Hiring Requirements

Position descriptions for child-facing roles at Talentpay must include the below:

Talentpay is a child safe employer – we are committed to providing a safe, supportive, and culturally inclusive working environment for children employed and involved in media productions, and all Talentpay employees are required to abide by the company’s child safe policies and code of conduct. All applicants for this position must possess, or be willing to obtain, a current Working With Children check and a recent (within the past 3 months) national police check. Reference checks will be conducted for this position.

Talentpay is an inclusive employer – we embrace and celebrate diversity and are committed to fostering an inclusive culture where all people are treated with respect and fairness, and where differences are celebrated. Talentpay has zero tolerance for discrimination based on race, religion, gender, sexuality, language spoken, physical or mental ability.

Position descriptions must also include any role-specific expectations and requirements as detailed below for production staff and on set supervisors.

For further guidance on developing position descriptions and hiring requirements, refer to the *Practical guide to choosing supervising and developing suitable staff and volunteers* saved in Production AU > People.

Off-Site Staff Requirements

All Talentpay staff must:

- a) Undergo a National Police Check prior to the commencement of employment
- b) Provide 2 referees (to be contacted and a full check undertaken prior to the commencement of employment)

Talentpay Production staff must also:

- c) Undergo onboarding training and regular refresher training covering this Policy and its appendixes, identifying and preventing risks of harm to children in the workplace, reporting requirements and how to act in the event of an incident.
- d) Complete the Child Safe eLearning modules provided by the NSW Office of the Children’s Guardian and the Human Rights Commission modules on the National Child Safe Principles every 2 years.
- e) Be prepared to enforce any and all WHS and child safety requirements for any given production, as directed by Senior Management, the HR Manager, or Child Safety Officer

Off-Site Staff Responsibilities

Talentpay Production Staff must:

- Undertake initial assessments of all scripts, storyboards, and creative briefs and notify clients if any performance, location, or prop requirements are inappropriate or unsafe for children.

- Review shoot schedules and callsheets to ensure planned work activities comply with the relevant codes and legislation.
- Complete and submit all required forms and supporting documentation to the state child employment body in accordance with requisite deadlines.
- Collect and file all required consent forms, school letters, and child information forms from parents prior to work commencing, and consult parents to ensure any specific cultural or accessibility needs are identified and accommodated.
- Undergo annual training on child employment legislative requirements.
- Process all documents and paperwork containing children's personal details in accordance with Talentpay's data privacy policy.

Talentpay Finance and IT Staff must:

- Process all documents and paperwork containing children's personal details in accordance with Talentpay's data privacy policy.

On Site Supervisor Requirements

Supervisors engaged by Talentpay to monitor welfare on set, regardless of whether they are a contractor or employee, must:

- a) Hold a valid, state-specific Working with Children Check (unless exempt under the relevant state's legislative requirements)
 - b) Provide their current nursing registration number (if working with children under 3) (to be updated annually)
 - c) Provide 2 referees (to be contacted and a full check undertaken before an employee is allowed on set with a child)
 - d) Undergo onboarding training and annual refresher training covering this Policy and its appendixes, identifying and preventing risks of harm to children in the workplace, reporting requirements and how to act in the event of an incident.
 - e) Complete the Child Safe eLearning modules provided by the NSW Office of the Children's Guardian and the Human Rights Commission modules on the National Child Safe Principles annually.
 - f) Be prepared to stop a shoot for the health/safety/wellbeing of a child or if it is in breach of state legislation.
 - g) Undergo annual compliance assessments which may consist of a review of submitted paperwork, collected feedback, or on-site monitoring.
- All approved supervisor contacts, verified WWCC details and other relevant certifications can be found on the Production AU SharePoint site under People > Crew.
 - All crew details and training to be reviewed and updated annually. Crew with expired WWCCs or training are to be removed from the approved supervisor list until they have supplied renewed documentation.

On Set Supervisor Responsibilities

Talentpay Supervisors must complete or collect the following documentation:

- Child monitor sheets
- Parent nominee forms for supervisors
- Incident reports and near miss forms (if needed)
- Record of child supervisors

And:

- Advocate for and act in the best interest of the child and champion their physical, emotional, and cultural safety in the workplace.
- Directly supervise or ensure children are directly supervised by a parent, legal guardian, or other appointed supervisor as permitted by the relevant state legislation.
- Always have control of the set.
- Liaise with other parties to ensure that break times & legal working hours are fulfilled.
- Be fully aware of child's legal working hours and break times.
- Be prepared to stop the shoot if there is danger of breach of Talentpay or any other stakeholder's Child Safe Code of Conduct, the Code of Practice (in VIC or NSW), or other Act or Regulation, or if the child feels unsafe, unwell, upset, or is injured.
- Notify the Head of Production if any issue arises with any child on set.
- Be able to explain the Code and the child's rights to the child, the parent/guardian, or production if clarification is needed.
- Have no other responsibilities on set.
- Fully erase all copies of forms containing children's personal details from their desktop/saved files once completed paperwork has been returned to Talentpay and filed on Talentpay's secure Sharepoint site.

Refer also to Child Supervisor Procedures for Talentpay expectations of onset representatives (Appendix B)

Responsible Persons

The HR Manager is responsible for conducting police and reference checks on prospective employees and maintaining the staff training register.

The Child Safety Officer is responsible for delivering onboarding training and refresher training in accordance with the Training Compliance Guidelines.

Both HR Manager and Child Safety Officer must be included in the interview panel for any prospective on site supervisors and production staff.

Review

This policy will be reviewed annually, considering changes in legislation or changes within company operations, and the findings of community consultation initiatives including a standing open invitation for feedback from child employees, their parents or guardians, and agents, and annual industry surveys to ensure everyone can have their say and help shape Talentpay's policies and procedures.

Related policies

This policy applies and is implemented alongside Talentpay's Work Health and Safety policy, Complaint Handling and Incident Reporting policy, and DEI policy.

A copy of this policy is publicly available at www.talentpay.com.au/policies

Relevant Legislation

New South Wales:

- [Children's Guardian Act 2019](#)
- [Children's Guardian Regulation 2022](#)
- [Children and Young Persons \(Care and Protection\) Act 1998](#)
- [Children and Young Persons \(Care and Protection\) Regulation 2022](#)
- [Child Protection \(Working with Children\) Act 2012](#)
- [Child Protection \(Working with Children\) Regulation 2013](#)

Governing body: NSW Office of the Children's Guardian (OCG)

Victoria:

- [Child Wellbeing and Safety Act 2005](#)
- [Child Employment Act 2003](#)
- [Mandatory Code of Practice](#)

Governing body: Wage Inspectorate Victoria

Queensland:

Legislation

- [Child Employment Act 2006](#)
- [Child Employment Regulation 2016](#)
- [Child Protection Act 1999](#)
- [Office of Industrial Relations Child Employment Guide 2024](#)

Governing body: Industrial Relations Queensland

APPENDIX A - Child Safe Code of Conduct

Where Talentpay is involved in a production, all parties involved agree to abide by the following code of conduct. A copy of this code is to be made available to all cast and crew on the production. Talentpay is committed to creating a safe, inclusive, and empowering environment for all children, particularly Aboriginal children, children from culturally and linguistically diverse backgrounds, and children with disability. All employees are to review this Code of Conduct regularly to ensure adherence to this code.

All adults must:

- Treat children and young people with dignity, respect, and fairness at all times
- Use appropriate language and tone; avoid yelling, sarcasm, or intimidation
- Listen to and take seriously any concerns or complaints raised by children
- Always seek the child's permission before physical contact, including costumes, makeup, or movement assistance
- Respect the child's right to say "no" or withdraw consent at any time
- Ensure interactions are age-appropriate, inclusive, and culturally sensitive

Adults must **not**:

- Engage in any form of physical punishment or inappropriate physical contact
- Develop special relationships with individual children that could be seen as favouritism
- Exchange personal contact details or communicate privately online with a child
- Take or share photos or videos of a child without written consent from their guardian and approval from Talentpay
- Place a child in a situation that may be physically or emotionally unsafe or which may cause a child to feel unsafe
- Be alone with a child without supervision

2. Cultural Safety & Inclusion

We are committed to the cultural safety of:

- **Aboriginal children** by recognising cultural protocols, involving community representatives where appropriate, and respecting identity and kinship structures
- **Children from culturally and linguistically diverse backgrounds** by avoiding assumptions, ensuring language access, and being culturally responsive
- **Children with disability** by adapting communication, recognising individual needs, and ensuring accessible environments and materials

3. Child Participation & Empowerment

All children have the right to be heard and included in decisions affecting them. All staff, cast, and crew must:

- Encourage children to speak up and ask questions
- Respond respectfully to children who say they feel unsafe, uncertain, or uncomfortable
- Use child-friendly, plain language and visuals to explain what will happen on set
- Support children to understand they can use safe words, break signals, or request a trusted adult at any time

4. Online and Social Media Boundaries

- All staff, cast, and crew must not communicate with children through private messages on social media
- All communication must occur through approved channels, under supervision
- No photos or footage of children may be posted, stored, or shared on personal pages. Any crew using photos or footage of children for professional promotion must obtain written parental consent.

5. Responding to Concerns

If a child or parent raises a concern, all staff, cast, and crew must:

- Listen calmly and without judgment
- Take the concern seriously and document it
- Report the matter immediately to the Talentpay Supervisor or Production Manager
- If there is an immediate risk to the child's safety, contact emergency services on **000**

In the event of a breach of this Code of Conduct or an incident or allegation of harm to a child, an incident report must be completed and copies provided to the child's parent/guardian and the Talentpay Supervisor or Head of Production.

APPENDIX B – Child Supervisor Procedures

ROLE	You are the face and voice of Talentpay on set. You are responsible for the health, safety, and wellbeing of children on set. You are also responsible for ensuring that the production is compliant with the state’s child employment legislation.
PRE-SHOOT	<p>Ensure you have all required paperwork ready to go:</p> <ul style="list-style-type: none"> - Monitor forms, nominee forms, welfare report - OCG/Vic Welfare fact sheet for parents - PEN (NSW) or permits and paperwork (VIC) - Callsheet - Code of Conduct <p>Paperwork may either be printed or stored on a laptop or tablet (with template forms being completed digitally on the day). If you are using a laptop or tablet, the device and any apps used must be approved by Talentpay’s IT team and you must follow Talentpay’s data security and privacy protocols. Do not keep documents on your device any longer than necessary.</p> <p>Make note of the hours each child is permitted to work as per state regulations.</p> <p>Read the callsheet & safety report. Familiarise yourself with potential risks, locations, call & break times, and wherever possible, cast names.</p> <p>Dress appropriately – sturdy, closed toed shoes (not ballet flats/slip-ons) clothing suited for the weather, sunnies/hat/umbrella/raincoat as required. If shooting outdoors, bring plenty of sunscreen.</p>

<p>ON ARRIVAL</p>	<p>Introduce yourself to the 1st Assistant Director (1st AD), Production Manager (PM), & Agency Producer (when possible). Ask for a shoot schedule if you have not already received one. Find out what arrangements are in place for lunch/parking/etc so that you can relay information to talent & parents if asked.</p> <p>As children arrive, sign them in and start a monitor form for each child. If children are not accompanied by a parent or legal guardian, ensure you have received a completed parent nominee form for the adult accompanying the child (a text or email from a parent would suffice if they neglected to complete the necessary paperwork prior to the shoot).</p> <p>If any child has travelled more than 90 minutes (NSW) / 60 minutes (VIC) / 45 minutes (QLD) to work, notify the 1st AD and PM immediately and deduct the excess time from the total hours they are permitted on set.</p>
<p>INDUCTION</p>	<p>Provide the children and parents with a copy of any relevant infographics on their rights and empowerment. In the event a child or parent is visually impaired or unable to read, read the document to them.</p> <p>Introduce yourself to the children and their parents. Introduce the children and parent or guardian to the AD(s) and nurse; explain what they will be doing today and tell them to listen very carefully to the nurse/AD/etc. Double check for food allergies or medical concerns. Instruct parents that wardrobe changes must occur in private and that they are expected to always have eyes on or accompany their children. If a parent needs to step away for any reason, they must notify you first. Ensure parents and children understand that they should come to you immediately at any time if they have any questions or concerns.</p>
<p>DURING THE SHOOT</p>	<p>Ensure production stays compliant and that all cast and crew adhere to the code of conduct. Give the 1st AD a 10-minute warning ahead of any 10-minute breaks being due.</p> <p>Monitor the children through wardrobe and makeup and make sure they are ready to travel to set when required. Keep track of who is used in each shot. Ensure children use the bathroom regularly and have plenty of water. Monitor breaks and ensure they meet the requirements of the state legislation.</p> <p>Know where every child (and every parent!) is at all times. Children should NEVER be alone with any crew member.</p> <p>Answer parents' questions as best you can. Ensure children can contact a parent or guardian at any time.</p> <p>Questions about payment/other employment opportunities should be directed to the children 's agent if they have one.</p>

At lunch, show children & parents where to go. If any child does not want to eat the food provided, ask catering to make them sandwiches. Ensure all kids have meals before getting your own.

Give the 1st AD a 30-minute warning when children are approaching their mandatory wrap time and subsequent warnings at 15, 10, and 5 minutes if necessary. DO NOT allow children to work beyond their permitted hours.

If it looks like delays will cause the shoot to run late and production wishes to keep the children longer than permitted, call the Talentpay Producer or Head of Production IMMEDIATELY.

<p>INCIDENTS</p>	<p>If a crew person breaches the code of conduct – notify that crew person immediately of the requirements of the code of conduct (a common issue that may occur is a crew person exchanging social media contacts with a child – this is against the code, even if the parents are the ones providing the social media information). If you have concerns about more serious misconduct, speak to the 1st AD and production manager and seek immediate resolution. Call the Head of Production to report the issue.</p> <p>If production becomes non-compliant, poses a risk to a child’s safety, or goes beyond permitted work hours, stop the shoot immediately. Have parents collect their child from the set.</p> <p>Call the Head of Production to report the situation. Shoots may resume if you are satisfied that there are no longer any compliance issues – e.g. if a safety concern has been mitigated or if children have received an adequate break.</p> <p>Complete an incident report (p3 of the Welfare Report).</p> <p>In the event of a serious incident of harm to a child’s physical, emotional, or cultural safety, or if any cast, crew, parent, or child comes to you with a complaint or allegation of abuse, complete an incident report. If you believe a child is in immediate danger, call 000.</p> <p>Otherwise, pass the report on to the Head of Production and be prepared to give follow-up details.</p>
<p>POST-SHOOT</p>	<p>Scan or photograph completed shoot forms and email to: team@talentpay.com.au</p> <p>Ensure you have deleted all documents containing children’s personal details (callsheets, monitor forms, child info forms, parental consent forms, school letters, etc) from your laptop or tablet within 1-week post-shoot.</p> <p>Email your timesheet or invoice to accounts@talentpay.com.au and jess@talentpay.com within 7 days of shoot.</p>

APPENDIX C - DEFINITIONS

Abuse: see Child abuse definition below.

Child abuse: (In the context of this policy) refers to an act or omission by an adult that endangers or impairs a child's physical and/or emotional health or development. Child abuse can be a single incident but often takes place over time. Child abuse includes any and all of the following:

- **Physical abuse:** When a child suffers or is likely to suffer significant harm from an injury inflicted by a parent/guardian, caregiver or other adult. The injury may be inflicted intentionally, or be the consequence of physical punishment or the physically aggressive treatment of a child. Physical injury and significant harm to a child can also result from neglect by a parent/guardian, caregiver or other adult. The injury may take the form of bruises, cuts, burns or fractures, poisoning, internal injuries, shaking injuries or strangulation.
- **Sexual abuse:** When a person uses power or authority over a child, or inducements such as money or special attention, to involve the child in sexual activity. It includes a wide range of sexual behaviour from inappropriate touching/fondling of a child or exposing a child to pornography, to having sex with a child and grooming with the intent of committing child sexual abuse.
- **Emotional and psychological abuse:** When a child's parent or caregiver repeatedly rejects the child or uses threats to frighten the child. This may involve name calling, put downs or continual coldness from the parent or caregiver, to the extent that it significantly damages the child's physical, social, intellectual or emotional development.
- **Neglect:** The failure to provide a child with the basic necessities of life, such as food, clothing, shelter, medical attention or supervision, to the extent that the child's health and development is, or is likely to be, significantly harmed.
- **Family violence:** When children and young people witness or experience the chronic, repeated domination, coercion, intimidation and victimisation of one person by another through physical, sexual and/or emotional means within intimate relationships. Contrary to popular belief, witnessing episodes of violence between people they love can affect young children as much as if they were the victims of the violence. Children who witness regular acts of violence have greater emotional and behavioural problems than other children.
- **Racial, cultural, religious abuse:** Conduct that demonstrates contempt, ridicule, hatred or negativity towards a child because of their race, culture or religion. It may be overt, such as direct racial vilification or discrimination, or covert, such as demonstrating a lack of cultural respect (attitude and values) and awareness (knowledge and understanding) or failing to provide positive images about another culture.
- **Bullying:** Repeated verbal, physical, social or psychological behaviour that is harmful and involves the misuse of power by an individual or group towards one or more persons. Bullying occurs when one or more people deliberately and repeatedly upset or hurt another person, damage their property, reputation or social acceptance.

Child Safe Standards: Promotes the safety of children, prevent child abuse, and ensure organisations have effective processes in place to respond to and report all allegations of child abuse.

Code of conduct: A set of rules or practices that establish a standard of behaviour to be followed by individuals and organisations. A code of conduct defines how individuals should behave towards each other and towards other organisations and individuals in the community (refer to Appendix A).

Cultural safety: an environment where there is no assault, challenge or denial of [a person's] identity, of who they are and what they need—this refers specifically to Aboriginal and Torres Strait Islander peoples. This encompasses Aboriginal and Torres Strait Islander individuals' own assessment of their safety and capacity to engage meaningfully on their own terms with a non-Indigenous person or institution. This requires action from the non-Indigenous person or institution to listen, enable and support these environments, with accountability to Aboriginal and Torres Strait Islander colleagues or service users. While this term refers specifically to Aboriginal and Torres Strait Islander peoples, it is important to respect diversity and cultural differences across the board.

Disability: the total or partial loss of the person's bodily or mental functions; total or partial loss of a part of the body; the presence in the body of organisms causing disease or illness; the presence in the body of organisms capable of causing disease or illness; the malfunction, malformation or disfigurement of a part of the person's body; a disorder or malfunction that results in the person learning differently from a person without the disorder or malfunction; a disorder, illness or disease that affects a person's thought processes, perception of reality, emotions or judgment or that results in disturbed behaviour.

LGBTQI: refers to all people who are lesbian, gay, bisexual, transgender, queer or questioning, have an intersex variation, and other members of the communities that use different terms to describe their diverse sexuality and/or gender.

Misconduct: behaviours that breach Talentpay's policies or code of conduct.

On Site Supervisor: A Talentpay employee or contractor present at employment activities involving children.