

Child Safe Policy FE

1. Purpose

- 1.1 The information contained in this Child Safe Policy includes legislative requirements as defined by the relevant governing body in each Australian state and territory.
- 1.2 This policy seeks to provide clear information as to how we will create and maintain a child safe and friendly environment.
- 1.3 We are committed to creating an organisational culture of awareness where everyone is aware of their responsibilities in keeping children and young people safe and protected through its delivery of products and services.
- 1.4 The policy will also outline the roles and responsibilities of everyone involved with the RTO.

2. Policy Scope

- 2.1 This policy applies to all employees, volunteers, contractors, students, children and young people and their families (parents/carers) who are involved in the delivery of our training products and services.

3. Who are we?

- 3.1 Foundation Education Pty Ltd (referred to as “we” throughout the policy) is a Registered Training Organisation (RTO) operating on a national scale in the provision of Vocational Education and Training.

4. Definitions or acronyms

Term	Definition
Harm	Includes physical harm or psychological harm (whether caused by an act or omission) and includes such harm caused by physical, mental or emotional harm.
At risk	At risk is defined as: <ul style="list-style-type: none"> • the child or young person has suffered harm; or • there is a likelihood the child or young person will suffer harm; or • enabling the child or young person to take part in an activity, or an action to be taken in respect of the child or young person, that would, if it occurred in this State, constitute an offence against criminal law.
RTO	Registered training organisation refers to Foundation Education Pty Ltd.

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5. Policy Requirement

5.1 Commitment to the safety of children and young people

- 5.1.1 In the delivery of its products and services, we will engage with children and young people from time to time.
- 5.1.2 We are committed to the delivery of a safe, fair, and inclusive environment to all children and young people.
- 5.1.3 We are also committed to ensuring:
- i. that children and young people are valued, respected and encouraged to participate and that the safety and protection of children and young people is always the first priority;
 - ii. our commitment to diversity e.g., all children and young people are embraced regardless of their abilities, sex, gender, or social economic or cultural background and equity is upheld;
 - iii. bullying and harassment will not be tolerated and;
 - iv. The Universal Principle is embedded in each of the Child and Youth Safe Standards. Each Standard has indicators of compliance reflecting the Universal Principle. This policy aligns with the ten principles when engaging with children and young people.
- 5.1.4 This commitment is a driving focus of how we operate and deliver our products and services within the Vocational Education and Training sector.
- 5.1.5 Please note, in South Australia, we are also committed to ensuring that our policy complies with the Children and Young People (Safety) Act 2017, and Child Safety (Prohibited Persons) Act 2016.
- 5.1.6 The National Principles for Child Safe Organisations emphasise the importance of an organisation in implementing policies and procedures that document and guide how an organisation operates to ensure the safety and wellbeing of children and young people. All employees, contractors and representatives, irrespective of role or responsibility, are expected to actively operate to keep children and young people safe from harm and mistreatment.

5.2 Responsibilities

- 5.2.1 This policy applies to all employees, volunteers, contractors, students, children and young people and their families who are involved in the delivery of our training products and services. Ensuring child safety and wellbeing is acknowledged as a shared responsibility. Certain roles and functions may hold uniquely special responsibilities as detailed in this policy. Throughout the policy, any mention of an employee, contractor or representative will defer to the definitions below.
- 5.2.2 All stakeholders are responsible for:
- i. Making and enforcing a commitment to child safety and wellbeing.
 - ii. Enforcing a commitment to child safety and wellbeing.
- 5.2.3 The Executive Team is responsible for:
- i. Championing a child safe culture.

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- ii. Modelling and reinforcing child safe behaviours and attitudes that value children and young people.
- iii. Supporting their organisational reports in driving child safe practices.
- iv. Appropriately addressing any allegations or disclosures of harm brought to their attention.

5.2.4 Managers and Team Leaders are responsible for:

- i. Promoting safety of children and young people at all times.
- ii. Assessing risk of harm when appropriately within scope and area of responsibility.
- iii. After the child related matter has been reported to the legal authority in the state/territory, managers and team leaders must escalate the child safety concern in writing to the Executive Team within 24 hours.

5.2.5 The Quality and Compliance Team is responsible for:

- i. Conducting a review of the child safe policy at least once every 5 years or sooner as per Section 5.15.3
- ii. Maintaining and reviewing any related policies and procedures to ensure adequate child safe practices in consultation with the Human Resources Department.

5.2.6 The Human Resources Department is responsible for:

- i. Ensuring all employees, contractors and representatives are provided training on the National Child Safe Standards.
- ii. Directing employees, contractors and representatives to additional training and support materials as available externally.
- iii. Following the recruitment process outlined in this policy.
- iv. Ensuring employees, contractors and representatives adhere to the code of conduct.

5.2.7 Employees:

- i. Refers to any staff member who is employed on a casual, part-time, or full-time basis.
- ii. Employees includes managers, team leaders, general staff at various levels.
- iii. Each employee must read and agree to accept and act in accordance with the policy.

5.2.8 Representatives (paid or unpaid) are responsible for:

- i. Familiarising themselves with the Policy, the Standards, relevant state legislation and any related policies and procedures.
- ii. Reporting any concerns about the safety of a child or young person to the Child Protection Statutory Authority in the state they are working in. After you have met your legal obligations you are required to report to your Manager or Team Leader.
- iii. Maintaining currency in understanding child safe legislation and requirements.
- iv. Refers to any individual who does not identify as an employee or contractor (including volunteers).
- v. All representatives are required to read, accept and act on the policy as a condition of the agreement.

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5.2.9 Contractors:

- i. Refers to an individual who holds a current and valid Australian Business Number and is delivering services on behalf of the RTO and have entered into a contractual agreement.
- ii. Contractors are required to read, accept and act on the policy as part of their contractual agreement.

5.2.10 In South Australia, all employees, contractors and representatives are mandated notifiers who must report to the South Australia Department for Child Protection if they suspect on reasonable grounds that a child or young person is, or may be, at risk of harm. If a mandated notifier forms a suspicion outside of their work (whether paid or voluntary) that a child or young person is, or may be, at risk of harm, they may make a notification to the Department for Child Protection voluntarily.

- i. The mandated notifier, must refer to the information on the [Department for Child Protection](#) website when notifying this department of any activity where they suspect that a child or young person is or may be at risk of harm.

5.2.11 We recognise that students do not directly act on behalf of or represent the RTO. Key parts of the policy still apply to students such as checks and behaviours. Where students are obligated under the relevant component of the policy, information will be detailed accordingly throughout the document.

5.3 Culture & Communication

National Principle 1: Child safety and wellbeing is embedded in organisational leadership, governance and culture.

National Principle 2: Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

National Principle 3: Families and communities are informed and involved in promoting child safety and wellbeing.

5.3.1 We are fully committed in implementing strategies, policies, frameworks, and operations which ensure the safety, wellbeing, and human rights of children.

5.3.2 In delivering our products and services in environments engaging children or young people, we strive to create environments where children and young people will feel safe and welcomed and where their participation is valued.

5.3.3 As part of the commitment to this, we ensure:

- i. This policy is made available to all new and existing employees, contractors and representatives as part of our induction process.
- ii. Cultural commitment to child safe practices and operations has been adopted and is supported at an Executive Level.
- iii. All employees, contractors and representatives are bound to act in accordance with the Policy and any other associated policies, processes, procedures, frameworks, or legislated requirements.
- iv. Employees, contractors and representatives will be provided with appropriate induction, training and professional development on children's rights, child safety and wellbeing.

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- v. The Policy is available to both internal representatives and external stakeholders.
 - vi. The Policy, and any related policies, processes, procedures, or frameworks, are reviewed at least once every 5 years or sooner as per Section 5.15.3.
- 5.3.4 We communicate our child safe policy on the company website which are available to all children, young people, and their families.
- i. A copy of the child safe policy is also provided during the pre-enrolment and enrolment stages of our delivery of services.
 - ii. We provide new employees, contractors, and representatives with a copy of the child safe policy during the induction process whereby signed acceptance is collected from each party.

5.4 Participation of families, children and young people

National Principle 2: Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

National Principle 3: Families and communities are informed and involved in promoting child safety and wellbeing.

- 5.4.1 We recognise the importance in ensuring children and young people are afforded the opportunity to be informed about their rights and to participate in decisions that affect them.
- 5.4.2 We are committed to:
- i. Conducting scheduled reviews of our products, services, and activities to identify opportunities to involve children and young people;
 - a. We will seek input from children and young people during our scheduled reviews. This may occur through direct conversation, emails, or an online survey.
 - ii. Ensuring a child or young person and their parents and carers are provided with information about their rights, what child safety and wellbeing means;
 - a. This information will be made available on our website and part of the pre-enrolment and enrolment process.
 - iii. Providing avenues and opportunities for children and young people to provide ongoing feedback including raising complaints.
 - a. We will use an online survey to seek online feedback from children and young people.
- 5.4.3 Employees, contractors and representatives are expected and obligated to seek the consent of children and/or their parents or carers to participate in any activities (i.e., receiving Vocational Education and Training).
- 5.4.4 We consider consent to be valid when it is:
- i. Informed – children and young people and their parents or carers must receive clear and age-appropriate information regarding the products, services and any associated activities (e.g., work placement requirements).
 - ii. Voluntary – where a child has refused to undertake an activity, this decision must be respected.

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- iii. Current and negotiable – children and young people must be aware they can withdraw at any time as supported by the Terms and Conditions of enrolment.
- 5.4.5 Children or young people under the age of 18, must have written consent from their parents or carers before they can engage with the products and services delivered.
- 5.4.6 Open and respectful communication with families and communities about the child safe policies is an important part of ensuring children can engage fully in our products and services. Ongoing feedback from any party related to the child or young person is also welcome and taken into consideration to drive continuous quality improvement to child safe operations.
- 5.4.7 Parents or carers and/or their children are provided with clear and accessible information about any training product or service involving the child or young person, its purpose, how the information will be used, and whom to contact if they have any concerns.
- 5.4.8 As aforementioned, the written consent of parents or carers is required for any product or service involving children under the age of 18. Where required or deemed necessary, we may seek consultation from industry to ensure its practices, products and services align with relevant legislation, or any other requirements to support children or young persons.

5.5 Code of conduct

National Principle 4: Equity is upheld and diverse needs respected in policy and practice.

National Principle 6: Processes to respond to complaints and concerns are child focused.

5.5.1 Accessibility of the Code of Conduct

- i. This code is applicable to all employees, contractors, representatives who are responsible or involved in the delivery of services. The code provides the minimum expected behaviours, and how to report a breach of the code. The code can be accessed from the company website at any given time by employees, contractors, representatives, children, young people and their families.
- ii. During the induction process of a new employee, contractor or representative, we will provide the member with a copy of the code which requires the member to abide by the code of conduct and sign the agreement.
- iii. Employees must log into their enableHR account to read and acknowledge the code of conduct.
- iv. All contractors and representatives (who are not employees) must complete the electronic version of the acknowledgment form which is available in Microsoft Word/PDF format. The signed copy must be returned to the Human Resources Department within five (5) working days.

5.5.2 Code of Conduct Details

- i. Caring for children and young people brings additional responsibilities for employees and volunteers. All employees and volunteers are responsible for promoting and protecting the safety and wellbeing of children and young people by:
- ii. sticking to the internal child safe policy at all times and taking all reasonable steps to ensure the safety and protection of children and young people

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- iii. reporting any child harm related matters or concerns to the relevant state child protection authority when we suspect harm or risk of harm to a child/young person
- iv. treating everyone (this includes staff, volunteers, students, children, young people and parents) including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld
- v. being a positive role model to children and young people in all conduct with them
- vi. setting clear boundaries about appropriate behaviour between yourself and the children and young people – boundaries help everyone to understand their roles
- vii. listening and responding appropriately to the views and concerns of children and young people being alert to bullying behaviours and responding promptly and appropriately
- viii. ensuring another adult is always present or in sight when conducting one to one coaching, instruction or other activity
- ix. responding quickly, fairly and transparently to any complaints made by a child, young person or their parent/guardian
- x. encouraging children and young people to ‘have a say’ on issues that are important to them.

5.5.3 Employees and volunteers must not:

- i. engage in rough physical games
- ii. develop any ‘special’ relationships with children and young people that could be seen as favouritism such as the offering of gifts or special treatment
- iii. do things of a personal nature that a child or young person can do for themselves, such as toileting or changing clothes
- iv. discriminate against any child or young person because of age, gender, cultural background, religion, vulnerability or sexuality.

5.5.4 Unacceptable behaviour, which may be deemed to be a breach of this code, includes:

- i. undertaking unlawful activity with or in relation to a child or young person
- ii. engaging in an activity likely to cause any physical, sexual or emotional harm to a child or young person
- iii. arranging personal contact, including online contact, with children or young people they work with for a purpose unrelated to educational activities
- iv. discriminating against any child/young person or their family members
- v. disclosing personal or sensitive information about a child or young person
- vi. using inappropriate language in the presence of children or young people
- vii. showing or providing children or young people with access to inappropriate images or material;
- viii. undertaking work activities with children or young people when under the influence of alcohol or prohibited drugs; and
- ix. ignoring or disregarding any suspected or disclosed risk of harm to a child or young person, including failure to make a report.

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5.6 Reporting a Breach of the Code of Conduct

5.6.1 Employees, contractors and representatives are mandated notifiers who are required to report any breach of this code of conduct.

5.6.2 The incident form will need to include information such as:

- i. child/young person's name, age, date of birth, address
- ii. description of injury, harm or at risk of harm
- iii. the child/young person's current situation
- iv. the location of the child/young person, parent or caregiver and alleged perpetrator
- v. when and how the mandated notifier learned about the incident or allegation of harm.

5.6.3 Reasonable grounds to report suspected harm may include:

- i. when your own observations of a particular behaviour and/or injuries lead you to suspect a child is, or may be, at risk of harm
- ii. when a child or young person tells you they have been harmed
- iii. a child or young person is telling you that they know of someone who has been harmed (they may possibly be referring to themselves)
- iv. when your own observations about the behaviour of a child or young person, or their adult caregivers, give you cause to suspect that a child or young person is being, or is at risk of being harmed
- v. when you hear about an incident or near miss from someone who is in a position to provide reliable information, perhaps a relative or friend, neighbour or sibling of a child or young person who is at risk

5.7 Reporting and responding to harm or risk of harm

National Principle 6: Processes to respond to complaints and concerns are child focused.

5.7.1 Reporting procedure (South Australia only) - Should an employee, contractor, representative or student become aware of an incident or allegation of harm of a child, the first priority is to ensure the safety of the child and to mitigate the risk of any further harm. An incident or allegation or belief that a child or young person is in harm or at risk of harm must be reported immediately. This applies to any allegations which are made against an employee, contractor, representative or student. The matter must not be reported internally as the first step, and the procedure below must be followed:

- i. The individual who identifies the harm or risk of harm is the person who makes the report to CARL/SAPOL and should, where possible provide as much information as available including the following:
 - Child's name, age, date of birth, address
 - Description of injury, or harm (current and previous)
 - The child's current situation
 - The location of the child, parent or caregiver and alleged perpetrator
 - When and how did you find out about the incident
 - If the child is Aboriginal you should also provide the Clan group of the child (if known)

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- ii. The relevant authority (CARL/SAPOL) will advise whether an internal investigation is appropriate
 - iii. If the individual has to make an internal report after reporting to CARL/SAPOL refer to the steps below:
 - Report the matter to the Child Abuse Report Line (CARL) on 13 14 78. In cases involving Aboriginal children and young people, report the matter to the CARL number by the Aboriginal team (Yaitya Tirramangkotti). The report line is open 24 hours a day, 7 days a week.
 - If the child or young person is at immediate risk, report to South Australia Police (SAPOL) on 000. CARL/SAPOL will provide guidance to the individual on whether an internal investigation is appropriate. Non-mandated notifiers are encouraged to make voluntary reports about harm or risk of harm to a child or young person.
 - The individual must also lodge an internal report after reporting to CARL/SAPOL within 24 hours of an incident or allegation, or reasonable belief that a child or young person is in harm or at risk of harm.
 - iv. Where an employee, contractor or representative has reported the child-related harm, this individual will need to complete a risk assessment of the incident and check whether existing risk controls need to be changed or for new controls to be introduced to prevent future reoccurrence. The completed risk assessment must be submitted to the Human Resources Department. After a matter has been reported to CARL or SAPOL, we will continue to monitor the situation, by providing up-to-date information about child safety and ensuring the wellbeing of all children, young people and their families.
- 5.7.2 Reporting procedure (Tasmania only) – In Tasmania an employee, contractor, representative or student who becomes aware of an incident or allegation of harm of a child, the first priority is to ensure the safety of the child and to mitigate the risk of any further harm. An incident or allegation or belief that a child or young person is in harm or at risk of harm must be reported to the Independent Regulator in accordance with the [Reportable Conduct Scheme](#). This applies to any allegations which are made against an employee, contractor, representative or student and the procedure below is followed:
- i. The individual who identifies the harm or risk of harm is the person who makes the report to the police by dialling 000 and should have the following information available:
 - Child’s name, age, date of birth, address
 - Description of injury, or harm (current and previous)
 - The child’s current situation
 - The location of the child, parent or caregiver and alleged perpetrator
 - When and how did you find out about the incident
 - ii. The individual must also report a concern about the safety or wellbeing of a child to the Strong Families Safe Kids Advice and Referral Line on 1800 000 123.
 - iii. The individual who identifies the harm or risk of harm must notify the Independent Regulator of any reportable conduct once becoming aware of it, even if the alleged conduct is historical in nature.
 - iv. The individual who identifies the harm or risk of harm will be required to conduct a reportable conduct investigation and must give to the Independent Regulator the

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investigation findings, reasons for findings and actions. In cases where the leader of the organisation conducts the investigation, the following steps must be taken:

- a. **Within three business days:** The employee, contractor, or representative must report reportable conduct to the Independent Regulator in writing and provide basic details such as the worker's name.
- b. **As soon as possible:** The employee, contractor, or representative must start an investigation (or get an independent investigator to do so).
- c. **Within 30 days:** The employee, contractor, or representative must provide detailed information to the Independent Regulator, including:
 - i. information about the allegation or conviction
 - ii. whether any actions have been taken (for example, placing a limit on a worker's contact with children)
 - iii. any written submissions.
- d. **At the end of the investigation:** The employee, contractor, or representative must provide the following information to the Independent Regulator:
 - i. findings of the investigation
 - ii. reasons for the findings
 - iii. details of any actions that have been taken as a result.
- v. Anyone can make a report about reportable conduct. While employees, contractors and representatives are covered by the Reportable Conduct Scheme and are legally required to report instances of reportable conduct, the Independent Regulator can receive voluntary reports from anyone. This includes people who aren't leaders of organisations, and children and young people themselves.

5.7.3 Standard reporting procedure (all states and territories excluding South Australia) - Should an employee, contractor, representative or student become aware of an incident or allegation of harm of a child, the first priority is to ensure the safety of the child and to mitigate the risk of any further harm. An incident or allegation or belief that a child or young person is in harm or at risk of harm must be reported to the police immediately in the state/territory. This applies to any allegations which are made against an employee, contractor, representative or student. The matter must not be reported internally as the first step and the procedure below is followed:

- vi. The individual who identifies the harm or risk of harm is the person who makes the report to the police by dialling 000 and should have the following information available:
 - Child's name, age, date of birth, address
 - Description of injury, or harm (current and previous)
 - The child's current situation
 - The location of the child, parent or caregiver and alleged perpetrator
 - When and how did you find out about the incident
- vii. Where an employee, contractor or representative has reported the child-related harm, this individual will need to complete a risk assessment of the incident and check whether existing risk controls need to be changed or for new controls to be introduced to prevent future reoccurrence. The completed risk assessment must be submitted to

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the Human Resources Department. After a matter has been reported to the police, we will continue to monitor the situation, by providing up-to-date information about child safety and ensuring the wellbeing of all children, young people and their families.

- viii. Further guidance on how to respond to a child or young person who discloses harm is available from the Australian Institute of Family Studies, [Responding to children and young people's disclosures of abuse](#).

5.8 Consequences of Breaching the Code of Conduct

- 5.8.1 Any individual covered by this policy, who is found to have breached this policy may be subject to disciplinary action, up to and including termination of employment. Further legal actions may be taken depending on the nature of the breach.
- 5.8.2 This policy will persist for persons and entities after cessation of any involvement with the RTO, if any disciplinary action is in motion or has commenced. If a breach of this policy is reported against a person or entity who is no longer associated with the RTO, the matter may still proceed if (and when) the person or entity resumes association at a later date.
- 5.8.3 Breaches of this code may result in disciplinary action, including possible dismissal, suspension or immediate termination of the service or contractual agreement. Breaches may also lead to criminal proceedings. The Human Resources Department will carry out the following steps where a breach has occurred:
 - i. Notify the individual of the breach in writing by email.
 - ii. Organise a formal meeting with the individual and discuss the breach.
 - iii. Provide a decision on whether to issue disciplinary action or dismissal/termination of the service or contractual agreement.
 - iv. Provide written confirmation of the decision will be issued to the individual in writing by email.

5.9 Recruitment

National Principle 5: People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

- 5.9.1 We have a strong commitment and responsibility to ensure all employees, contractors and representatives are the most suitable people to work with children or young people. This includes:
 - i. Providing position descriptions, with a commitment to child safety and wellbeing
 - ii. Conducting face-to-face interviews (either in person or virtually) which involves covering behavioural questions in relation to child safeguarding
 - iii. Conducting and documenting two (2) referee checks
 - iv. Providing appropriate induction and training to new and existing employees, contractors and representatives.
 - v. Scheduling regular checks on existing employees/contractors/representatives, that they renew their Working with Children Check as per the state-specific requirements and the status remains as not prohibited.

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- vi. Verifying the accuracy of the Working with Children Check before employing a new employee, contractor or representative to work with children and young people. A copy of the verification check will be saved on file by the Human Resources Department.
- vii. Ensuring valid Working with Children Checks for students who partake in activities or work placements with reasonable expectations for interaction with children or young people.

5.9.2 In addition to the above process, the following items are also applicable in South Australia:

- i. Meeting the requirements of the Child Safety (Prohibited Persons) Act 2016 by ensuring new and existing employees, contractors and representatives who are in direct contact with children and young people hold a current and valid 'not prohibited' Working with Children Check issued by the Department of Human Services Screening Unit. This also applies to the supervisors and managers for any service delivery roles. A copy of the verification check will be saved on file by the Human Resources Department.
- ii. Scheduling regular checks on existing employees/contractors/representatives, that they renew their Working with Children Check every 5 years and the status remains as not prohibited. Verification will be completed through the Organisation Portal via the Department of Human Services Screening Unit. A copy of the verification check will be saved on file by the Human Resources Department.
- iii. Advising the Department of Human Services Screening Unit of any information about any person involved, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

5.10 Supervision, training and support for employees, volunteers

National Principle 5: People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

National Principle 7: Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

5.10.1 We will employ a range of strategies to supervise, support and train its employees, contractors and representatives.

5.10.2 Supervision strategy:

- i. Regular on-the-job supervision sessions that include a focus on child safety and wellbeing.

5.10.3 Support strategies:

- i. An induction process that includes new employees/contractors/representatives receiving a copy of this policy and their responsibilities to children and young people, including record keeping, information sharing and reporting obligations.
- ii. Regular performance reviews and supporting training as required

5.10.4 Training strategies:

- i. Training on how to appropriately respond to children or young people with diverse needs is provided to new and existing employees, contractors, and representatives from

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time to time. Free online training courses are offered by the Australian Human Rights Commission, through their [free e-learning modules](#).

5.10.5 In South Australia, all representatives delivering services to children or young people must also:

- i. Ensure all employees/contractors/representatives read and understand the [Mandatory Notification Information Booklet](#).
- ii. All mandated notifiers must attend a Responding to Risks of Harm, Abuse and Neglect – Education and Care (RRHAN-EC) on commencement and complete the Fundamentals (refresher) course every 2 years.
- iii. Ensure all employees/contractors/representatives view the resources on ‘keeping our kids safe’ developed by [SNAICC](#).
- iv. Include child safety as a standing item on meeting agendas.
- v. Ensure all employees/contractors/representatives have access to web-based resources about issues concerning child safety and wellbeing.
 - Protective practices for staff in their interactions with children and young people
 - Sexual behaviour in children and young people procedure and guideline
 - Managing allegations of sexual misconduct in SA education and care settings
- vi. Encourage all employees/contractors/representatives seek professional development opportunities to build knowledge and skills regarding the wellbeing and development of children and young people.

5.10.6 In Tasmania, if you are an employee, volunteer or external service provider for the Department for Education, Children and Young People (DECYP), you must complete the relevant [Safeguarding Training Course](#).

- i. This also applies to students who are seeking to complete their placement (as part of their qualification/training program) in a Department for Education, Children and Young People (DECYP) organisation. As the DECYP are responsible for:
 - Child and Family Learning Centres
 - Tasmanian Government Schools
 - Child Safety and Out of Home Care
 - Youth Justice Services
- ii. The Safeguarding Training certificates (for staff, external service providers, and volunteers) will expire on 31st December of the year that the training was completed. The training must be completed each year.

5.10.7 We have a strong commitment to ensuring all employees, contractors and representatives are suitable and supported for any work involving children or young people. This includes:

- i. Providing appropriate induction and training to new and existing employees/contractors/representatives.
- ii. Ensuring new and existing employees/contractors/representatives in direct contact with children have a valid Working with Children Check as regulated by the State or Territory Governing Body.
- iii. Ensuring valid Working With Children Checks for students who partake in activities or work placements with reasonable expectation for interaction with children or young people.

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iv. Ensuring ongoing review and management of child safety and wellbeing.

5.10.8 All employees/contractors/representatives are obligated to attend any child safe training available or from any authorised external body as directed by their manager. All employees/contractors/representatives are encouraged to source and review additional information, support, and advice on various aspects of child safe operations. Employees/contractors/representatives are directed to relevant bodies, such as State Government Departments and National Children’s Commissioner.

5.11 Support strategies

5.11.1 Following a report of harm, we will support children, young people, and families in the following ways:

- i. Referral to professional services such as the state-specific child and family support services (refer to Table 1).
- ii. Monitoring the child or young person, and their family by having regular check-points every month.

Table 1: Child and family support services	
State/Territory	Department and links
Queensland	Department of Child Safety, Seniors and Disability Services https://www.dcssds.qld.gov.au/our-work/child-safety/protecting-children
New South Wales	Department of Communities and Justice https://www.dcj.nsw.gov.au/children-and-families/children-and-young-people.html
Victoria	Department of Families, Fairness and Housing https://services.dffh.vic.gov.au/child-protection
Western Australia	Department of Communities https://www.wa.gov.au/organisation/department-of-communities/child-protection
Tasmania	Department for Education, Children and Young People https://www.decyp.tas.gov.au/children/child-safety-service/ Independent Regulator https://oir.tas.gov.au/
Australian Capital Territory	Community Services https://www.communityservices.act.gov.au/children-and-families
Northern Territory	Department of Territory Families, Housing and Communities https://www.ntcommunity.org.au/service/department-of-territory-families-housing-and-community-northern-territory-child-protection/
South Australia	Department for Child Protection https://www.childprotection.sa.gov.au/

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5.12 Reporting and responding to general complaints or feedback

National Principle 6: Processes to respond to complaints and concerns are child focused.

5.12.1 A child, young person or their families will receive a copy of our B3.0-PL002 Grievances, Complaints and Appeals Policy FE and B3.0-WP002 Grievances, Complaints and Appeals Procedure FE during the enrolment process (and an electronic copy is also available on the company website) which contains information on how to lodge a complaint or give feedback. We are committed to addressing all complaints and feedback in a prompt, fair and sensitive manner.

5.13 Risk management

National Principle 8: Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

5.13.1 We are committed to minimising the risk of harm to children and young people in all physical and online environments. The table below contains different risks and the actions to be taken to minimize each scenario.

Identified risk	Actions to minimise risk
Culture of organisation is not child-safe focussed	<ul style="list-style-type: none"> child focused Code of Conduct is in place that sets the behavioural standards expected including what happens when a breach occurs culture of management reflects our strong commitment to the safety of children and young people the National Principles for Child Safe Organisations are embedded in policies and procedures
Employees, contractors, and representatives harm children/young people	<ul style="list-style-type: none"> recruitment processes including undertaking referee checks to ensure the suitability of persons before they are employed/volunteer with our organisation interview questions pertaining to the child safeguarding will gauge an applicant's understanding of child safe principles and actions that would be taken to prevent harm to children and young people all employees/contractors/representatives have a completed and approved WWCC with 'not prohibited' result prior to working with children and young people WWCC status remains as not prohibited children and young people and their families are given a copy of our Child Safe Environments policy

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	and complaints and feedback process as part of a welcome/induction pack
Employees, contractors, and representatives do not understand their obligations to report child related harm and risk of harm to the police in their state/territory.	<ul style="list-style-type: none"> all employees/contractors/representatives completed internal training, with additional training available as provided by the Australian Human Rights Commission all employees/contractors/representatives must abide by the Child Safe Code of Conduct, (latter is signed on commencement with organisation) all employees/contractors/representatives completed internal training, with additional training available as provided by the Australian Local Government Association (free e-learning modules)
Employees, contractors, and representatives do not understand their obligations to report harm and risk of harm to the SA Child Abuse Report Line or SA Police if child/young person is at immediate risk. South Australia only.	<ul style="list-style-type: none"> all employees/contractors/representatives must complete the RRHAN-EC course on commencement (South Australia only) and every 2 years complete the Fundamentals Course (refresher). RRHAN-EC and Fundamentals refresher courses are available on the SA Department of Education website.
Physical contact	<ul style="list-style-type: none"> any physical contact must be appropriate to the delivery of services being provided and in adherence to this policy and relating company policies. where physical contact is required, this is undertaken in a safe way by explaining why contact is required and what will happen, and asking the child/young person for their permission (or their family if this is more appropriate) before proceeding
Online communications	<ul style="list-style-type: none"> cyber safety and social media guidelines are in place and provided to all employees/contractors/representatives appropriate supervision is provided for all online activities employees/contractors/representatives must not communicate with children or young people via social media without company consent.
Supervision	<ul style="list-style-type: none"> during face-to-face contact the children and young people will be supervised by an employee/contractor/representative who holds a current WWCC at all times

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	<ul style="list-style-type: none"> when providing one to one consultation with a child or young person, it will be in line of sight of another adult
Taking images of children and young people	<ul style="list-style-type: none"> consent of child young person and their parent/guardian required disclosure will be made as to how the image is to be used and consent must be provided by the child, young person and parent/guardian images must be presented in a way that de-identifies the child or young person
Physical environment	<ul style="list-style-type: none"> maintain a risk register that is reviewed annually to ensure effectiveness conduct risk assessments for all activities ensure all equipment is in good working order
Privacy and confidentiality	<ul style="list-style-type: none"> all documents containing confidential information will be stored privately in a locked filing cabinet (or similar place with restricted access) digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties representatives, employees, contractors must not disclose information regarding any child or young person without written consent of the child, young person and their parent/guardian

5.14 Related policies and procedures

National Principle 9: Implementation of the national child safe principles is regularly reviewed and improved.

5.14.1 We are committed to operating in alignment with any legislation as defined by the relevant State Governing body through the development, implementation and maintenance of the following child safe policies, procedures, and frameworks.

Application	Document
Policy, procedure and processes	<ul style="list-style-type: none"> S5.0-PL003 Child Safe Policy FE (includes code of conduct) B3.0-PL002 Grievances, Complaints and Appeals Policy FE B3.0-WP002 Grievances, Complaints and Appeals Procedure FE S5.0-PL004 WWCC Policy FE S5.0-WP002 WWCC Procedure FE B3.0-PL006 VETiS Student Handbook FE B3.0-PL004 Student Handbook FE

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5.14.2 All related documents are maintained and updated on a regular schedule as to ensure the implementation of practices and operations that keep children and young people safe from harm.

5.15 Policy review

National Principle 9: Implementation of the national child safe principles is regularly reviewed and improved.

5.15.1 We are committed to reviewing the policy, and any related documents and legislation, at least once every 5 years or sooner as per Section 5.15.3 to ensure relevancy and efficacy of its child safe practices. The review of the policy is conducted by the Quality and Compliance Team with respect and consideration to current practices, survey data and any complaints or concerns raised.

5.15.2 We will lodge a new child safe environments compliance statement with the SA Department of Human Services each time the policy is reviewed and updated. The policy document will contain the approval date and the next scheduled review date in the document footer.

5.15.3 Other instances where we would review these documents sooner than the 5 year interval includes:

- i. New or added risks are identified for children or young people, which may require a change in the policy or procedures.
- ii. A critical incident where a child or young person has experienced harm.
- iii. Concerns are raised by anyone involved about child safety or welfare.
- iv. Awareness or compliance to the child safe policy and/or procedures is low.
- v. Legislative changes/requirements.

6. References

6.1 We acknowledge the importance of state/territory legislation in ensuring the safety and well-being of all children and young people. We remain strongly committed to establishing and maintaining practices and operations which meet the requirements of said legislation. All employees/contractors/representatives are expected to act in accordance with this child safe policy and all relevant legislation.

Scope	Legislation/standard
National – Australia wide	<ul style="list-style-type: none"> National Principles for Child Safe Organisations
Queensland	<ul style="list-style-type: none"> Child Protection Act 1999 Family and Child Commission Act 2014 Guardianship and Administration Act 2000 Human Rights Act 2019 Public Guardian Act 2014 Working with Children (Risk Management and Screening) Act 2000 Working with Children (Risk Management and Screening) Regulations 2011 Youth Justice Act 1992

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	<ul style="list-style-type: none"> • ISO/IEC Guide 50:2014 Safety aspects — Guidelines for child safety in standards and other specifications • Human Services Quality Standards
Australian Capital Territory	<ul style="list-style-type: none"> • Children and Young People Act 2008 • Human Rights Act 2004 • Crimes Act 1900
New South Wales	<ul style="list-style-type: none"> • Children's Guardian Act 2019 • Children and Young Persons (Care and Protection) Act 1998 • Children and Young Persons (Care and Protection) Regulation 2012 • Children and Young Persons (Care and Protection) (Child Employment) Regulation 2015 • Child Protection (Working with Children) Act 2012 • Child Protection (Working with Children) Regulation 2013
Northern Territory	<ul style="list-style-type: none"> • Care and Protection of Children Act 2007
Tasmania	<ul style="list-style-type: none"> • Children, Young Persons and Their Families Act 1997 • Personal Information Protection Act 2004 • Family Violence Act 2004
Victoria	<ul style="list-style-type: none"> • Child Wellbeing and Safety Act 2005
Western Australia	<ul style="list-style-type: none"> • Children and Community Services Act 2004
South Australia	<ul style="list-style-type: none"> • Children and Young People (Safety) Act 2017 • Child Safety (Prohibited Persons) Act 2016 <p>Documents and hyperlinks referenced in this document include:</p> <ul style="list-style-type: none"> • Notifications Checklist • Protective practices for staff in their interactions with children and young people • Sexual behaviour in children and young people procedure and guideline • Managing allegations of sexual misconduct in SA education and care settings • Keeping our kids safe developed by SNAICC • Child Safe Environments • Child safe environments compliance statements <p>Other training courses</p> <ul style="list-style-type: none"> • Please note, the 'through their eyes' training course is available and can be completed by persons in all other sectors, which are not part of the school sector or by those who work with school students.

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7. Policy approval date

- 7.1 This policy is effective as of 02/12/2024
- 7.2 The next scheduled review date for this policy will be 02/12/2029.

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