



Child Safe Policy

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1 Purpose

The Association for Educational Projects Limited (AEPL) is committed to providing an environment that is safe for children and young people, where they feel supported to develop to their full potential as individuals.

The Child Safe Policy (this Policy) is a demonstration of AEPL's commitment to protecting children and young people from all forms of abuse and harm. The purpose of this Policy is to:

- Promote the health, safety, welfare, and wellbeing of all children
- Ensure a safe environment is maintained for children when they participate in activities and programs organised by AEPL
- Communicate AEPL's commitment to child safety
- Outline the child safety roles and responsibilities of Officers, Study Centre Managers, Leaders, and Helpers
- Demonstrate compliance with the Child Safe Standards and the National Principles.

2 Scope

This Policy applies to Officers, Study Centre Managers, Leaders, Helpers, contractors, and sub-contractors engaged by AEPL to deliver services to children.

This Policy extends to all aspects of educational activities and programs of AEPL, including those delivered in the physical and online environments.

3 Terms and Definitions

For the purposes of this Policy:

Term	Meaning
AEPL	Association for Educational Projects Limited.
CALD	Culturally and Linguistically Diverse.
Centre	Refers to a study centre established by AEPL in which its educational activities are conducted.
Child	A person under the age of 18 years, unless under the law applicable to the children, majority is attained earlier.
Child abuse	Refers to acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. The forms of child abuse are sexual abuse, emotional abuse, neglect, physical abuse, and exposure to family violence.
Child Safe Organisation	Refers to an organisation that consciously and systematically creates conditions that reduce the likelihood of harm to children. It creates conditions that increase the likelihood of identifying and reporting harm and responds appropriately to disclosures, allegations, or suspicions of harm.

Child Safety Officer (CSO)	Refers to the individual appointed by AEPL who is responsible for matters relating to child safety, including the management of child safety complaints.
Helper	A person less than 18 years old invited to help from time to time in a particular activity at a Centre.
Leader	An adult who has an ongoing role in the provision of services in a Centre.
The National Child Safe Standards	The Standards encompass 10 key elements that create a Child Safe Organisation. The Standards provide clear guidance for organisations to create cultures and adopt strategies to put the interests of children first, to keep them safe from harm.
The National Principles	The National Principles for Child Safe Organisations ('the National Principles') aim to provide a nationally consistent approach to creating child safe organisations. The National Principles reflect the 10 Child Safe Standards and cover all forms of abuse.
Officer	Has the same meaning given by the <i>Corporations Act 2001</i> (Cth) and includes a director or secretary of AEPL.
Staff	Refers to an individual at AEPL in a paid position. This may include Study Centre Managers.
Study Centre Manager	A person appointed by AEPL to direct activities at a Centre.
Victorian Child Safe Standards	Refers to the mandatory framework in Victoria that requires child-related organisations to implement policies and strategies to protect children from abuse. In Victoria, there are 11 Child Safe Standards.
Volunteer	Refers to an unpaid employee of AEPL. This includes AEPL Officers, Leaders and Helpers, and may include Study Centre Managers. It also includes other individuals engaged by AEPL on a voluntary basis.
Working with Children Check (WWCC)	Refers to the legislative requirement for individuals to obtain a WWCC (or equivalent) as applicable in any relevant State or Territory.

4 The Child Safe Standards and the National Principles

This Policy is a reflection of AEPL's commitment to implementing the Child Safe Standards and the National Principles throughout its operations.

Each State and Territory Government is responsible for implementing legislation to embed and monitor compliance of the Child Safe Standards and/or the National Principles. Refer to **Appendix A** for guidance on State/Territory regulatory frameworks relevant to AEPL's Centre locations.

5 **Statement of Commitment to being a Child Safe Organisation**

AEPL has zero tolerance for child abuse and believes that every child has a right to grow and develop in a safe environment that is free from harm. AEPL is committed to being a Child Safe Organisation, and embedding child safety into everyday practice by:

- Promoting the rights of children, including their right to speak up and participate in decisions that affect their lives.
- Establishing clear policies and procedures that outline AEPL's approach to child safety.
- Communicating child safety information to relevant stakeholders, including staff, volunteers, children, and their families.
- Demonstrating respect for, and acknowledging the diverse needs of First Nations children, children from CALD backgrounds, and children with a disability.
- Engaging staff and volunteers who are suitable to work with children, through the adoption of rigorous recruitment and screening processes.
- Promoting a culture of openness, where concerns regarding child safety are reported and addressed promptly.
- Escalating and reporting child safety complaints to the relevant external authorities (where required) and in accordance with AEPL's *Child Safe Complaints Handling Procedure*.
- Delivering child safe training and education to staff and volunteers on an ongoing basis, to equip them with the necessary knowledge and awareness to prevent child abuse and ensure the safety of children.
- Ensuring staff and volunteers are aware of and understand:
 - Their child safe responsibilities and legal reporting obligations
 - The AEPL Child Safe Framework, including the standards of behaviour as outlined in the *Child Safe Code of Conduct*.
- Identifying child abuse risks early and implementing risk management strategies to mitigate these risks in both physical and online environments.
- Conducting regular child safe audits, policy reviews and risk assessments to ensure AEPL's Child Safe Framework is continually improved and remains up to date with relevant child safety legislation and regulation.

6 **Child and Youth Participation and Empowerment**

AEPL recognises and values the rights of all children. AEPL is committed to providing an environment where children feel safe to provide feedback and raise concerns. AEPL actively empowers and supports the participation of children by:

- Providing age-appropriate information to children about AEPL's child safety approach including:
 - Children's right to speak up

- Appropriate and inappropriate behaviours
- How to provide feedback and raise safety concerns at AEPL.
- Delivering programs and activities that are suitable to the age, development, capability and understanding of the children involved.
- Providing ongoing child safety training and education to staff and volunteers on how to empower children and promote their participation.
- Supporting children to develop positive friendships with their peers when participating in AEPL's programs and activities.

7 Engaging with Families

AEPL recognises the important role that parents have in keeping their child safe. AEPL actively engages with parents to ensure that they feel confident that their child is safe whilst participating in activities and programs. AEPL is committed to:

- Involving parents in decisions relating to their child's participation at AEPL.
- Communicating child safety information to parents, including:
 - AEPL's child safe policies and procedures
 - How to raise a concern relating to child safety at AEPL.
- Providing regular opportunities for parents to provide feedback about AEPL's activities, programs and child safety practices.

8 Diversity and Inclusion

AEPL promotes a supportive and inclusive environment where all children feel valued and respected regardless of their background, abilities or circumstances. AEPL is committed to protecting the safety of all children, including First Nations children, children from CALD backgrounds and children with a disability, by:

- Providing information to children and families about AEPL's child safety approach in formats that are accessible and age appropriate.
- Tailoring programs and activities to accommodate children from specific cultural backgrounds and/or children with a disability to promote equal participation.
- Encouraging and supporting children to express their culture and enjoy their cultural rights.
- Providing ongoing training and education to staff and volunteers to equip them with the knowledge to implement inclusive practices and cater to the diverse needs of children.
- Accessing external expert advice when required, such as cultural advice or disability support.

9 Recruitment and Screening

AEPL adopts stringent recruitment, screening, and induction processes to ensure only suitable individuals are engaged to work and volunteer with children. Please

refer to AEPL's *Child Safe Recruitment Procedure* for further guidance. The Procedure outlines State and Territory requirements for Working with Children Check clearances, Working with Vulnerable People Checks, and Blue Card.

10 Complaints Handling

Child safety complaints are taken seriously and responded to promptly at AEPL. The *Child Safe Complaints Handling Procedure* outlines how AEPL manages child safety complaints and provides guidance on State/Territory legal reporting requirements for key areas, including:

- Failure to Report/Disclose offence
- Failure to Protect offence
- Duty to Prevent Child Abuse
- Allegations made against AEPL staff and volunteers.

11 Risk Management

AEPL recognises that a comprehensive risk management strategy is integral to creating a safe environment for children. AEPL adopts a Child Safe Situational Prevention approach to minimise risks of harm and abuse to children. For guidance, refer to AEPL's *Child Safe Risk Management Procedure*.

12 Responsibilities

Parties or Persons	Responsibilities
<p>All Staff and Volunteers</p>	<p>All staff and volunteers are responsible for:</p> <ul style="list-style-type: none"> • Complying with this Policy and the <i>Child Safe Code of Conduct</i> • Completing child safe training at induction and on an ongoing basis • Maintaining a valid WWCC clearance or equivalent • Identifying and addressing child safety risks in their areas of responsibility • Raising child safety concerns in accordance with AEPL's <i>Child Safe Complaints Handling Procedure</i> • Reporting child safety concerns to the relevant authorities in accordance with child safe legal obligations and reporting requirements.

<p>Officers (<i>AEPL Board Members</i>)</p>	<p>AEPL Officers are responsible for:</p> <ul style="list-style-type: none"> • Implementing AEPL’s child safe framework • Ensuring AEPL’s compliance with child safety legislation and regulation • Communicating AEPL’s values and child safety approach to all relevant stakeholders • Recruiting suitable individuals for the position of Study Centre Manager • Ensuring child safety complaints are managed and escalated in accordance with AEPL’s <i>Child Safe Complaints Handling Procedure</i> • Providing ongoing support to the CSO • Implementing a comprehensive risk management framework that minimises child abuse risks • Leading continuous improvement and conducting a regular review of this Policy in accordance with legislative changes and/or regulatory updates.
<p>Safeguarding Committee</p>	<p>The Safeguarding Committee is responsible for:</p> <ul style="list-style-type: none"> • Demonstrating leadership in embedding AEPL’s child safe policies, procedures and practices • Promoting awareness of child safety throughout AEPL • Reporting to AEPL’s Board on child safety matters • Supporting the CSO fulfilling their child safe responsibilities • Assisting the CSO to co-ordinate and/or deliver child safety training to staff and volunteers • Overseeing the handling of child safety complaints, including the investigation process • Monitoring child safe legislative and regulatory updates.
<p>Child Safety Officer (CSO)</p>	<p>The CSO is responsible for:</p> <ul style="list-style-type: none"> • Demonstrating leadership in embedding AEPL’s child safe policies, procedures and practices • Reporting to the Safeguarding Committee about child safety at AEPL • Providing child safety information, advice and guidance to staff, volunteers, children, and families • Arranging and/or delivering child safety training to staff and volunteers • Tracking and documenting staff and volunteer participation in child safe training

	<ul style="list-style-type: none"> • Supporting Study Centre Managers to implement AEPL’s child safe policies and procedures at the Centres, including WWCC requirements and other child safety legal responsibilities • Maintaining AEPL’s centralised WWCC register, in accordance with State/Territory legislative requirements • Receiving, responding to and managing child safety complaints • Escalating child safety complaints in accordance with the <i>Child Safe Complaints Handling Procedure</i> • Leading investigations into child safety complaints • Providing support to anyone (child, parent, or individual) who reports a child safety matter • Communicating with affected parties involved in a complaint.
<p>Study Centre Managers</p>	<p>Study Centre Managers are responsible for:</p> <ul style="list-style-type: none"> • Maintaining a duty of care towards all children participating in AEPL activities and programs • Setting an example of appropriate behaviour in accordance with the <i>Child Safe Code of Conduct</i> • Ensuring suitable individuals are appointed to the positions of Leader and Helper at the Centre in accordance with AEPL’s <i>Child Safe Recruitment Procedure</i> • Supporting Leaders and Helpers to understand the requirements of this Policy • Verifying the WWCC clearances of Leaders, Helpers, and third parties if engaged at the Centre • Providing the CSO with the WWCC clearance and verification details of all Leaders and Helpers • Escalating child safety complaints in accordance with AEPL’s <i>Child Safe Complaints Handling Procedure</i> • Completing risk assessments in accordance with AEPL’s <i>Child Safe Risk Management Procedure</i> • Ensuring the Centre complies with its record keeping responsibilities outlined in <i>Section 14</i> of this Policy.
<p>Leaders and Helpers</p>	<p>Leaders and Helpers are responsible for:</p> <ul style="list-style-type: none"> • Providing a safe environment for all children • Maintaining a duty of care towards all children participating in AEPL’s activities and programs • Supervising children under their care at all times • Seeking advice from the Study Centre Manager if they do not understand any aspect of this Policy or supporting procedures

	<ul style="list-style-type: none"> • Remaining vigilant to the possible signs of abuse in children • Raising any concerns with the relevant Study Centre Manager.
Contractors / Third Parties	<p>Contractors and third parties are responsible for:</p> <ul style="list-style-type: none"> • Complying with AEPL's child safe policies and procedures • Maintaining a current WWCC clearance (or equivalent) if required by law.

13 Confidentiality

AEPL acknowledges the sensitive nature of matters relating to child abuse. Officers maintain strict control over access to confidential records. AEPL maintains the confidentiality of information relating to complaints, except in cases where it is essential to:

- Uphold its duty of care in keeping children safe from abuse and harm
- Ensure that relevant parties are adequately informed during a complaints process
- Comply with applicable legislation, which requires AEPL to share information with the Police or other prescribed bodies.

14 Record Keeping

AEPL keeps complete and accurate physical and/or digital records of all serious child abuse matters for a period of **40 years**. All other documents are retained for a minimum of **7 years**. AEPL ensures that all records are:

- Maintained appropriately in a clear, logical and secure manner
- Handled in compliance with applicable laws, such as the *Privacy Act 1988* (Cth)
- Preserved in an appropriate physical and/or digital environment to safeguard against degradation, loss, alteration, corruption or deletion
- Secure from unauthorised access
- Stored securely in a locked filing cabinet (physical records)
- Stored in a password-protected file (digital records)
- Available for individuals who have a right to access records which contain their personal information.

15 CCTV and Surveillance

Where utilised, AEPL adopts the following Best Practice principles in relation to access, storage and use of CCTV:

- CCTV devices are installed for authorised purposes only. Devices are not installed in areas which have view into bathrooms or other private spaces.
- CCTV devices are made clearly visible with signage displayed on the premises indicating that CCTV devices are in operation.

- CCTV footage is stored securely with antivirus and internet security software regularly maintained.
- CCTV footage is retained for a minimum of 30 days. If there is an incident, footage is stored for an extended period for the purpose of police investigations.
- Personal information obtained through CCTV is stored in accordance with the *Privacy Act 1988 (Cth)*. Any personal information recorded through CCTV is destroyed and/or de-identified when it is no longer needed.
- Only authorised persons are granted access to view CCTV footage, with multiple access controls in place such as passwords and authorisation codes.
- Access to and release of CCTV footage is for authorised purposes only, such as for police investigation purposes.

16 Breaches of this Policy and Supporting Procedures

AEPL responds promptly to all breaches of this Policy and supporting procedures. The response will be managed in a fair, unbiased, and supportive manner. Depending on the nature of the breach, AEPL may take the following actions:

- Conduct mediation between the parties involved in the incident
- Take disciplinary action, including but not limited to the suspension or termination of an individual's engagement with AEPL
- Restrict a person's duties at AEPL, if the person involved in the breach was a staff member or volunteer
- Provide specific education and training with emphasis on the relevant component of this Policy that was the subject of the breach
- Providing closer supervision of a staff member or volunteer
- Review current policies and procedures and make updates if necessary.

The details of the breach will be documented, recorded, and kept confidential in accordance with the confidentiality and record keeping requirements outlined in this Policy.

17 Policy Review

This Policy, once adopted, is to remain in force until it is reviewed by AEPL. This Policy will be reviewed annually, or earlier as required in accordance with legislative and/or regulatory updates.

Feedback from Parents and Children

AEPL is committed to engaging parents and children in the development of this Policy. All suggestions are taken seriously and considered by AEPL. Each Centre is responsible for communicating this Policy and providing opportunities for parents and children to provide feedback to improve this Policy.

18 Related Policies and Procedures

This Policy should be read in conjunction with the following related documents:

- *Child Safe Code of Conduct*
- *Child Safe Complaints Handling Procedure*
- *Child Safe Recruitment Procedure*
- *Child Safe Risk Management Procedure*

19 Relevant Legislation

- *Child and Youth Safe Organisations Act 2023 (Tas)*
- *Child Protection Act 1999 (Qld)*
- *Child Protection (Working with Children) Act 2012 (NSW)*
- *Child Protection (Working with Children) Regulation 2013 (NSW)*
- *Child Protection Regulation 2011 (Qld)*
- *Child Wellbeing and Safety Act 2005 (Vic)*
- *Child Wellbeing and Safety Regulations (Vic)*
- *Children and Young Persons (Care and Protection) Act 1998 (NSW)*
- *Children and Young Persons (Care and Protection) Regulation 2012 (NSW)*
- *Children's Guardian Act 2019 (NSW)*
- *Children's Guardian Act 2019 Amendment (Child Safe Scheme) 2021 (NSW)*
- *Civil Liability Act 2002 (NSW)*
- *Crimes Act 1900 (NSW)*
- *Crimes Act 1958 (Vic)*
- *Criminal Code Act 1899 (QLD)*
- *Privacy Act 1988 (Cth)*
- *Worker Screening Act 2020 (Vic)*
- *Working with Children (Screening) Act 2004 (WA)*
- *Working with Vulnerable People (Background Checking) Act 2011 (ACT)*

20 Version History

The below table provides a summary of changes and amendments to this document.

Version.	Approved by	Approval date	Effective date	Change Details
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				•
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Appendix A – State Regulatory Frameworks

New South Wales (NSW)	
Legislation	<i>Children’s Guardian Act 2019</i> (NSW)
Framework	NSW 10 Child Safe Standards
Regulator	Office of Children’s Guardian (OCG)
Further Information	<ul style="list-style-type: none"> • Why we have Child Safe Standards Office of the Children’s Guardian (nsw.gov.au) • Implementing the Child Safe Standards Office of the Children’s Guardian (nsw.gov.au) • How to meet the Standards Office of the Children’s Guardian (nsw.gov.au)

Queensland	
Legislation	<i>Working with Children (Risk Management and Screening) Act 2000</i> (Qld)
Framework	Under the Blue Card System, child-related organisations are required to implement a <i>Child and Youth Risk Management Strategy</i> .
Regulator	Blue Card Services
Further Information	<ul style="list-style-type: none"> • Child and youth risk management strategies Your rights, crime and the law Queensland Government (www.qld.gov.au) • Child and youth risk management strategy toolkit - Blue Card Services compliance information and resources - Publications Queensland Government • Child and youth risk management strategy self-assessment checklist - Blue Card Services compliance information and resources - Publications Queensland Government

Victoria	
Legislation	<i>Child Safety and Wellbeing Act 2005</i> (Vic)
Framework	Victorian 11 Child Safe Standards
Regulator	Commission for Children and Young People (CCYP)
Further Information	<ul style="list-style-type: none"> • CCYP The 11 Child Safe Standards • CCYP Being a child safe organisation • CCYP Resources and support for the Child Safe Standards

Tasmania	
Legislation	<i>Child and Youth Safe Organisations Act 2023</i> (Tas)
Framework	Tasmania’s Child and Youth Safe Standards (<i>based on the National Principles</i>)
Regulator	Independent Regulator, reports to the Tasmanian Government
Further Information	<ul style="list-style-type: none"> • Child and Youth Safe Organisations Framework CARCRU (justice.tas.gov.au) • Resources CARCRU (justice.tas.gov.au)

Appendix B – Identifying the Forms and Possible Signs of Abuse

Child abuse refers to acts or omissions (neglect) that result in, or have the likelihood to result in, harm to a child. There are two different signs of abuse, physical and behavioural. A person should not assess individual signs in isolation, rather signs should be looked at in the context of other potential signs and the personal circumstances or history of the child.

- **Physical signs** are the injuries / visible harms that may occur as a result of abuse.
- **Behavioural signs** are the actions, attitudes, and emotions of an individual that indicate abuse may have occurred.

The signs of abuse noted below are not exhaustive. The presence of these signs does not necessarily mean that abuse has been, or is, occurring.

Physical Abuse

Refers to the use of deliberate physical force against a child that intentionally or unintentionally results, or has the likelihood of resulting, in harm.

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Bruising • Fractured bones • Burns / scalds • Lacerations and welts • Sprains and dislocations. 	<ul style="list-style-type: none"> • Covering up injuries • Fear of adults • Unable to explain an injury • Being aggressive towards others • Avoiding physical contact.

Emotional/Psychological Abuse

Refers to inappropriate verbal or symbolic acts by an adult towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability.

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Physical development is delayed • Delayed speech • Bed-wetting beyond usual age • Extreme weight loss • Signs of self-harm. 	<ul style="list-style-type: none"> • Overly compliant behaviour • High levels of anxiety or depression • Avoids interaction with other children • Demonstrating low self-esteem • Lack of trust in people • Extreme attention seeking behaviour.

Sexual Abuse

Refers to when a person exposes a child to, or involves a child in, sexual activity that the child does not fully comprehend, the child is unable to give informed consent to, the child is not developmentally prepared for and that is contrary to acceptable community standards.

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Pain or bleeding in anal or genital areas • Bruises and/or bite marks to breasts, buttocks, lower abdomen • Difficulty walking or sitting • Unexplained pain in genital area • Bed-wetting beyond usual age. 	<ul style="list-style-type: none"> • Children describing sexual acts • Sexual behaviour beyond healthy development • Self-destructive behaviour • Withdrawn behaviour • Regression in development.

Child Grooming

Child grooming is a form of sexual abuse. It refers to actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child's inhibitions in preparation for sexual activity with the child.

Possible Grooming Strategies
<ul style="list-style-type: none"> • Using favouritism, bribes and/or giving gifts to a child • Spending inappropriate one-on-one time with a child • Actively isolating children from other adults or children • Violating personal boundaries in the context of intimate care. This includes bathing, toileting and changing clothes. • Insisting on physical affection with a child such as hugging, kissing, tickling even when a child does not appear to want it. • Communicating privately with a child through personal social media accounts • Forming relationships with parents, guardians, and family members of children in order to build trust and ease their ability to access the child.

Neglect

Refers to the failure to provide a child with conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing, such as food, clothing, shelter, hygiene, medical attention, or adequate supervision. Neglectful behaviours are an act of omission, or by wilful choice.

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Low weight for age • Poor standards of hygiene • Untreated physical problems • Poor complexion. 	<ul style="list-style-type: none"> • Stealing food • Indiscriminately seeks out adult affection • Being constantly tired • Frequently late or absent • Being withdrawn.

Exposure to Family Violence

Refers to any form of abusive behaviour by a person towards another family member. The abuse can be physical, sexual, emotional, psychological, economical, threatening, or coercive type behaviour. It is also a form of abuse when a child is exposed to, hears or witnesses any of the effects of the abusive behaviours.

Physical signs	Behavioural signs
<ul style="list-style-type: none"> • Speech disorders • Delays in physical development • Physical symptoms such as headaches and stomach aches • Being easily startled • Injuries as a result of harm. 	<ul style="list-style-type: none"> • Behavioural signs may include: • Fear of and avoiding going home • Depression, anxiety, or suicidal thoughts • Violent or aggressive behaviour and language • Demonstrated fear of parents.