



CHILD SAFE POLICY

PREAMBLE

AEG commits to Child safety by having zero tolerance for child abuse.

It actively works towards listening to and empowering Children by:

1. having systems to protect Children from abuse;
2. taking all allegations and concerns of Child abuse very seriously and responding to them consistently in line with its policies and procedures;
3. promoting cultural safety for First Nations Children and Children from culturally and/or linguistically diverse backgrounds;
4. providing a safe environment for Children with a disability; and
5. ensuring that risk management strategies concerning the safety and wellbeing of Children are developed and implemented having regard to the National Principles for Child Safe Organisations.

DEFINITIONS AND ACRONYMS

“AEG” means Australian Pacific College Education Group and includes Australian Pacific College, English Unlimited and APC Design School.

“Child/Children” means a student of AEG who is under the age of 18 years calculated from the time of the student’s date of birth. AEG also refers to these students as Underage Students.

“Child Related Work” means work in a specific child related role or with direct contact with a child. Refer to sections 6 and 7 of the Child Protection (Working With Children) Act 2012 (NSW), section 9 of the Working with Children Act 2005 (VIC) and the Working with Children (Risk Management Screening) Act 2000 (QLD). Child Related Work positions may include roles such as:

- mentoring or counselling positions;
- teachers/trainers and assistants;
- home stay providers;
- student services;
- school cleaners;
- approved provider or manager of education services;
- assessment officers;
- support services that come into contact with Children (Qld);
- education programs conducted outside of school (Qld);
- transport services for Children (Vic).

“First Nations Children” means children who:



- a) are descended from a First Nations or Torres Strait Islander; and
- b) identify as a First Nations or a Torres Strait Islander; and
- c) are accepted as a First Nations or Torres Strait Islander by a First Nations or Torres Strait Islander community.

“LEU” means the Learner Engagement Unit/Campus Services.

“LIU” means the Learning Innovation Unit.

“Mandatory Reporters” are certain professionals defined by either the Children, Youth and Families Act 2005 (Vic), the Child Protection Act 1999 (Qld) or the Children and Young Persons (Care and Protection) Act 1988 (NSW) who are required to report suspicions of child abuse and/or neglect to statutory authorities.

“Policy” means this Child Safe Policy.

“VIT” means the Victorian Institute of Teaching.

“WWCC” means a Working With Children Check issued by the relevant State government department.

1. CHILDREN’S PARTICIPATION

- 1.1 AEG encourages and respects the views of Children who participate in our programs. We listen to and act upon any concerns Children or their families raise with us. We provide students and their families with information on their rights, what they can do and who they should speak to, if they feel unsafe and how to access AEG’s complaints procedures.

2. STAFF AND VOLUNTEERS

- 2.1 AEG seeks to attract and retain the best employees and volunteers. AEG provides support and supervision to its employees and volunteers so they feel valued, respected and fairly treated.
- 2.2 AEG requires that all employees are appropriately trained to promote the establishment and maintenance of a Child safe environment. Existing employees are exposed to recurring information that will:
 - a) reinforce this Policy and the Staff Code of Conduct;
 - b) raise their awareness of Child protection issues including recognising signs of reportable conduct and indicators of abuse;
 - c) advise them of their statutory obligations; and
 - d) provide clear guidance in relation to appropriate and inappropriate behaviour.
- 2.3 As part of their induction to AEG, newly recruited employees will be given copies of this Policy and the Staff Code of Conduct. The new recruits will be stepped through their obligations under this Policy/code.



- 2.4 All employees and volunteers are directed to AEG's website to access copies of AEG's Staff Code of Conduct and this Policy.

3. CHILD PROTECTION OFFICER

- 3.1 The Campus Director/Manager/Coordinator in each State will fulfil the role of Child Protection Officer for all campuses in that particular State. The Child Protection Officer role includes:
- a) to be aware of current child protection legislation;
 - b) keeping up to date and complying with any changes in legislation and practices;
 - c) arranging appropriate training and education for staff to be aware of this Policy and how to implement it;
 - d) identifying the potential for Child abuse and reviewing this Policy and the Risk Management Plan;
 - e) cooperating with other services/professionals in the best interests of Children and their families;
 - f) ensuring that families are aware of support services provided by AEG;
 - g) implementing the procedures for reporting suspected Child abuse and management of complaints;
 - h) notifying the approved provider immediately on becoming aware of a concern, complaint or allegation regarding the health, safety and wellbeing of a Child;
 - i) offering support to the Child, their family and to staff in response to reports relating to the health, safety and wellbeing of a Child; and
 - j) maintaining confidentiality at all times.

4. RECRUITMENT

- 4.1 In addition to complying with employment screening legislation for people engaged in Child Related Work, AEG seeks to recruit employees that would be strongly supportive of the pastoral needs of students. It takes all reasonable steps to ensure that it engages the most suitable and appropriate people to work with Children.
- 4.2 AEG adheres to its Recruitment and Induction of Academic Staff Policy and the Recruitment and Selection Policy for General Staff when it is recruiting for positions at AEG.

5. STATE SCREENING SCHEMES

- 5.1 All States and Territories have legislation providing for Child-related employment pre-screening. AEG requires the implementation of the following state screening schemes when recruiting people for Child Related Work:

STATE	COLLEGE'S OBLIGATIONS	EMPLOYEE'S OBLIGATIONS	LEGISLATION
-------	-----------------------	------------------------	-------------



NSW	<ul style="list-style-type: none"> AEG must be registered online with the NSW Office of the Children's Guardian. AEG must verify online the WWCC of all new paid employees. All existing paid workers and all volunteers (new and current) need their WWCC verified online. The WWCC is valid for 5 yrs and subject to ongoing monitoring by the State. 	<ul style="list-style-type: none"> The employee or volunteer is responsible for their own application for a WWCC. 	Child Protection (Working with Children) Act 2012 (NSW)
QLD	<ul style="list-style-type: none"> AEG must have policies and procedures in place to identify and minimise risk of harm to Children which are monitored by the Public Safety Business Agency. The Blue Card is valid for 3yrs. 	<ul style="list-style-type: none"> The employee or volunteer is required to apply for a WWCC (also called a Blue Card). 	Working with Children (Risk Management and Screening) Act 2000 (Qld)
VIC	<ul style="list-style-type: none"> The Working With Children clearance is valid for 5 years. 	<ul style="list-style-type: none"> The employee or volunteer is required to apply for a WWCC. If you are a teacher who is currently registered with the VIT, you are exempt from applying for a WWCC. NOTE: the VIT registration is only valid for one year. If your VIT registration is suspended or cancelled, you are no longer exempt and must apply for a WWCC. You must, in writing, notify every organisation that engages you in Child-related work within seven days of the suspension or cancellation of your 	Working With Children Act 2005 (Vic)



		registration.	
--	--	---------------	--

6. REFERENCE CHECKS

- 6.1 The people responsible for interviewing candidates and conducting reference checks must be confident, assertive and probing in their questions. At least one person on the interview panel should be experienced in undertaking referee checks. When calling referees, it is important to verify who you are talking to and AEG prefers that one referee must be the current or most recent employer. AEG uses various reference check documents and you should approach your campus manager for the most appropriate document to use.

7. PERFORMANCE REVIEWS

- 7.1 AEG has robust staff and volunteer performance management strategies in place.

8. CODE OF CONDUCT

- 8.1 Caring for Children brings additional responsibilities for the employees and volunteers of AEG. Staff, especially trainers/teachers, are often seen as role models and play a major part in the successful delivery of educational programs. AEG expects that all staff will commit to AEG's Staff Code of Conduct and implement any risk management strategies developed by AEG for Child protection and intervention found in this Policy.

- 8.2 All employees and volunteers of AEG are responsible for promoting the safety and well-being of Children by:

- a) ensuring the safety and welfare of the Child is paramount at all times;
- b) treating all Children with dignity, equality and respect;
- c) adhering to this Policy, and the Staff Code of Conduct;
- d) listening and responding appropriately to the views and concerns of Children and their families within AEG;
- e) taking all reasonable steps to ensure the safety and protection of Children within AEG;
- f) ensuring Children and families understand their rights and what they can expect when participating in a service, activity or program offered by AEG;
- g) guiding the Children and their families to the Campus Manager, a trainer/teacher or AEG's complaints procedures (whichever is appropriate) in times of trouble;
- h) responding quickly, fairly and transparently to any serious complaints made by a Child or their parent/guardian and directing the Children and their families to the Campus Manager or the complaints procedures (whichever is appropriate) in times of trouble;
- i) notifying AEG's Child Protection Officer and/or the appropriate Child protection body as soon as practicable if they have a reasonable suspicion that a Child has been or is being abused or neglected.



8.3 Employees/volunteers will not:

- a) take part in any unnecessary physical contact with a Child;
- b) discriminate against any Child because of age, gender, cultural background, religion, vulnerability or sexuality; and/or
- c) develop any inappropriate relationships with Children outside of the professional relationship.

9. RESPONDING AND REPORTING SUSPECTED CHILD ABUSE

- 9.1 AEG will not tolerate incidents of Child abuse. Any conduct that is alleged or suspected to be Child abuse will be a Critical Incident and will activate the Critical Incident Policy.
- 9.2 AEG's Child Protection Procedure outlines the processes for reporting and acting on disclosures or concerns about Child abuse for the principals, employees and volunteers of AEG.
- 9.3 AEG encourages and respects the views of Children who participate in their programs. It listens to and acts upon any concerns Children, their parents or their families/guardians raise with it. Children, their parents/guardians and students are informed of their rights and what they can do and who they should speak to, if they (or their Children) feel unsafe. AEG ensures that Children, their families/guardians and students know how to access the complaints procedures available to them and who they should speak to in times of trouble.
- 9.4 The Children, their families/guardians and students are informed at orientation that in times of trouble they should speak to the Student Official Point of Contact (Emergency number available 24 hours), ([Campus Managers](#)).

10. LEGISLATIVE RESPONSIBILITIES

- 10.1 AEG takes its legal responsibilities seriously with respect to Child safety, including (but not limited to):
 - a) **Mandatory Reporters:** Any employees of AEG who are Mandatory Reporters must report to the relevant state authority if they believe that a Child is in need of protection from physical injury or sexual abuse.
 - NSW - Department of Family and Community Services - phone 13 21 11
 - VIC - Department of Human Services - phone 1300 664 977
 - QLD - Department of Communities Child Safety and Disability Services - phone (07) 3224 8045
 - b) **Failure to Disclose:** Reporting Child sexual abuse is a community-wide responsibility. AEG expects all employees to be vigilant in reporting Child sexual abuse. However, in Victoria all adults who have a reasonable belief



that an adult has committed a sexual offence against a **child (under 16 years of age)** have a legal obligation to report that information to the Police. A person will not commit this offence if they have a reasonable excuse for not disclosing the information, including a fear for their safety or where the information has already been disclosed.

- c) **Failure to Protect:** AEG expects all employees will attempt to protect any Child from the substantial risk of sexual abuse. However, in Victoria, people of authority in AEG (including employees) will commit an offence if they know of a substantial risk of **child (under 16 years of age)** sexual abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so.

11. IDENTIFYING AND REDUCING OR REMOVING RISKS OF CHILD ABUSE

- 11.1 Risk Management of Child safety is set out in the AEG Risk Management Policy, AEG Risk Management Plan, the LEU Risk Management Plan and the LIU Risk Management Plan.
- 11.2 The heads of LIU and LEU must make sure the Child Protection Officer or Campus Manager/Director in each State is aware of and involved in the risk management strategies for Child safety.

12. THIRD-PARTY ARRANGEMENTS FOR UNDER 18 OVERSEAS STUDENTS

- 12.1 Where AEG engages third parties to organise and assess accommodation or welfare arrangements for overseas students under 18 years of age, AEG must ensure those arrangements comply with the documented AEG policies and processes for selecting, screening and monitoring such third parties.

13. POLICY REVIEW

- 13.1 This Policy will be reviewed every three years or following significant incidents (if they occur) or in accordance with legislative changes. Students, their families and importantly local First Nations communities, culturally and linguistically diverse communities and people with a disability (if they apply) and their reasonable views will be considered in these reviews.

RELEVANT LEGISLATION

This document references the following legislation, regulations, codes and standards:

Relevant Legislation/codes/standards	
Commonwealth	National Code of Practice for Providers of Education and Training to Overseas Students 2018



	National Child Safe Principles
New South Wales	Children and Young Persons (Care and Protection) Act 1998 (NSW) Child Protection (Working with Children) Act 2012 (NSW)
Queensland	Child Protection Act 1999 (Qld) Working with Children (Risk Management and Screening) Act 2000 (Qld)
Victoria	Child Safe Standards, Education and Training Reform Act 2006 (VIC) Children, Youth and Families Act 2005 (VIC) Working with Children Act 2005 (VIC) Crimes Act 1958 (VIC)

RELATED POLICIES AND PROCEDURES

This document references the following AEG policies and/or procedures:

Related Policies and Procedures	
Policies	Staff Code of Conduct Recruitment and Induction of Academic Staff Policy Recruitment and Selection Policy for General Staff Critical Incident Policy Student Complaint and Appeals Policy Accommodation and Welfare Policy for Under 18 year old Students. Child Protection Procedure AEG Risk Management Policy
Procedures	Reference Checklist Orientation Program AEG Risk Management Plan LEU Risk Management Plan LIU Risk Management Plan

KEYWORDS

Keywords	Child Safety, Child abuse, First Nationsl Children, safety, Child protection, Child Protection Officer, relationships, failure to disclose, failure to protect, mandatory reporters
-----------------	---

POLICY OWNER

Policy Owner	Executive Committee
---------------------	---------------------



POLICY/PROCEDURE HISTORY

Policy History			
Current version	Current version release date	Author	Description of changes
Child Safe Policy 1.0R	December 2018	Sara Gaudry	Original Policy
Child Safe Policy v1.1R(APC/EU/APCDS)	March 2021	Sara Gaudry	Update of letterhead, removal of APTT & inclusion of APC Design School. No change to content.
Child Safe Policy v1.2R(APC/EU/APCDS)	Feb 2023	Sara Gaudry Marta Setkowicz	General review and consolidation of risk management information into the LEU, BIU and AEG risk management Plans
Child Safe Policy v1.3(draft)(APC/EU/APCDS)	Not yet released	Sara Gaudry	General review, addition of commitment to compliance with National Child Safe Principles, and third party responsibilities when outsourcing tasks (new clause 12) and change of ownership to EC.