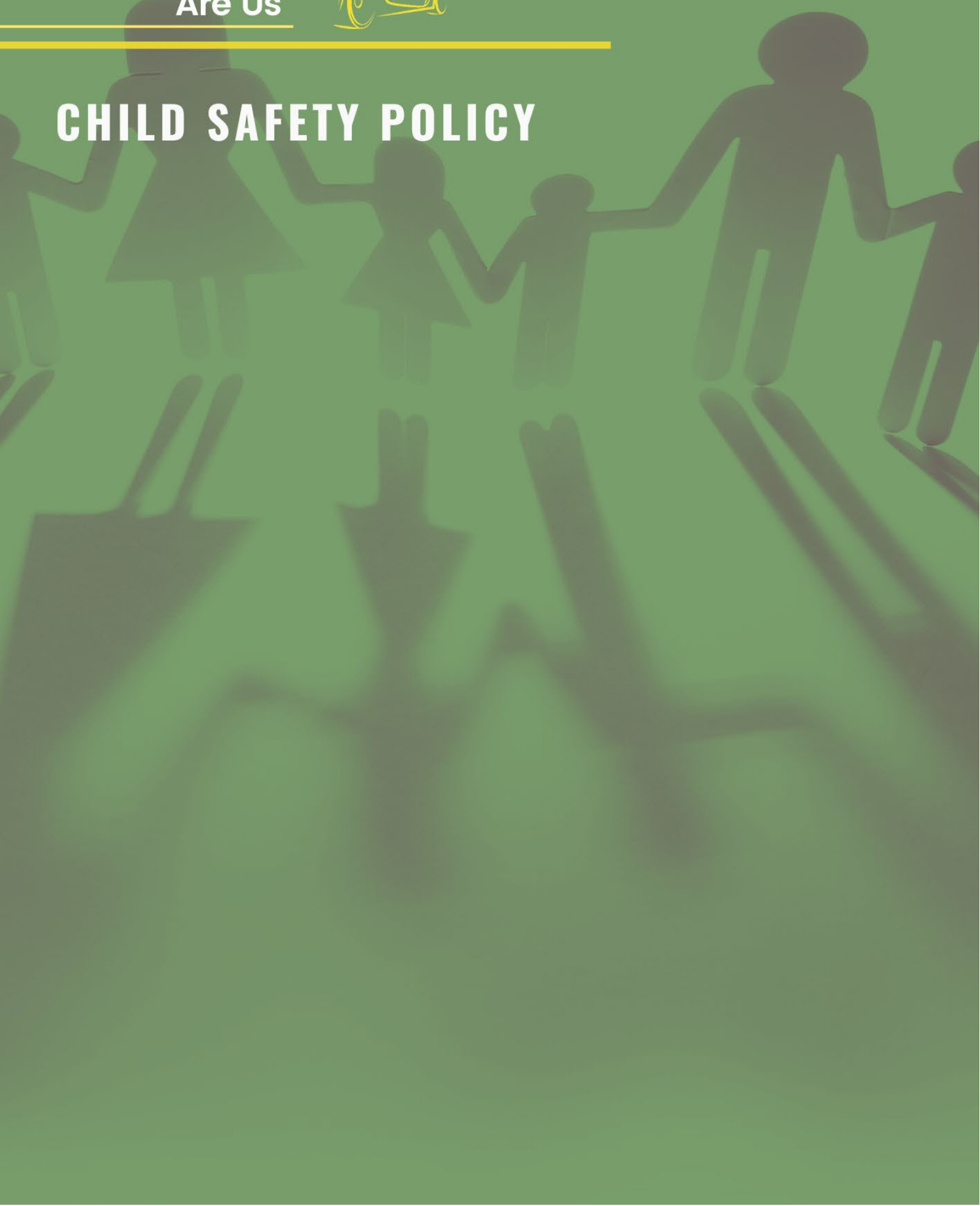


Apprenticeships
Are Us



CHILD SAFETY POLICY



INTRODUCTION

Apprenticeships Are Us Limited is committed to promoting and protecting the interests and safety of children. We have zero tolerance for child abuse. This policy complies with the *National Standards for Group Training Organisations (Standard 2.2)*, which emphasizes the responsibility of GTOs to ensure child safety and implement strategies that protect the well-being of apprentices and trainees. Apprenticeships Are Us Ltd adheres to these standards by monitoring Host Businesses environments, ensuring safe training sites, and providing child protection training to all staff.

Everyone working at Apprenticeships Are Us Limited (ARU) is responsible for the care and protection of children and reporting information about child abuse.

GOVERNANCE & LEGISLATIVE FRAMEWORK

This Child Safety Policy is guided by the following legislation, standards and regulatory frameworks:

Commonwealth

- **National Principles for Child Safe Organisations (2019)**
- **Australian Children's Commissioners and Guardians (ACCG) Child Safe Standards**
- **Criminal Code Act 1995 (Cth)** – grooming and online exploitation offences
- **Fair Work Act 2009 (Cth)** – workplace safety and anti-bullying protections
- **Privacy Act 1988 (Cth)** – protection of personal and sensitive child information
- **Cybersecurity Standards Act 2023 (Cth)** – digital protection obligations

NSW

- **Children's Guardian Act 2019 (NSW)**
- **Child Protection (Working With Children) Act 2012 (NSW)**
- **Child Protection (Working With Children) Regulation 2013**
- **Children and Young Persons (Care and Protection) Act 1998 (NSW)**
- **Crimes Act 1900 (NSW)** – grooming, sexual offences, abuse
- **Child Safe Scheme (2022–2023 amendments)**
- **Reportable Conduct Scheme (Office of the Children's Guardian)**

Other States & Territories (for national placements)

As applicable to apprentice placements in VIC, QLD, ACT or WA.

Other Governance Instruments

- **ACNC Governance Standards** – Standard 1 (purpose), Standard 2 (accountability), Standard 5 (duties of responsible persons)
- **National Standards for Group Training Organisations (2017)** – Standard 2.2 (child safety)
- **Apprenticeships Are Us Ltd Constitution**
- **ARU Code of Conduct & Child Safety Code of Conduct**

This framework requires ARU to operate a **zero-tolerance**, **proactive**, and **preventative** child safety system.

DEFINITIONS

“Child”

Any person under the age of 18.

“Child Abuse”

Includes:

- physical abuse;
- emotional abuse;
- psychological harm;
- sexual abuse;
- grooming;
- neglect;
- family violence witnessed by a child;
- online exploitation.

“Grooming”

Actions intended to manipulate or build trust with a child or their carer for the purpose of sexual abuse (Crimes Act 1900 NSW).

“Reportable Conduct”

Defined by the Children’s Guardian Act 2019 includes sexual offences, sexual misconduct, ill-treatment, neglect, psychological harm, and use of excessive force.

“Mandatory Reporter”

A person legally required to report suspected child abuse (varies by state). ARU treats all staff as “mandatory reporters” under internal policy.

“Child-Related Work”

Work involving direct contact with children that requires a WWCC.

“Reasonable Grounds”

A belief formed based on:

- disclosures;
- observations;
- behaviours consistent with abuse;
- reports from others;
- environmental or circumstantial indicators.

“Cultural Safety”

An environment where Aboriginal and Torres Strait Islander children, and children from culturally diverse backgrounds, feel safe, respected and valued.

“Online Harm”

Any exploitation, grooming, harassment, or abuse occurring via digital platforms, including social media, messaging, gaming, or virtual learning environments.

PURPOSE

The purpose of this policy is:

1. To facilitate the prevention of child abuse occurring within Apprenticeships Are Us Limited.
2. To work towards an organisational culture of child safety.
3. To prevent child abuse within Apprenticeships Are Us Limited.
4. To ensure that all parties are aware of their responsibilities for identifying possible occasions for child abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs.
5. To provide guidance to staff/volunteers/contractors as to action that should be taken where they suspect any abuse within or outside of the organisation.
6. To provide a clear statement to staff/volunteers/contractors forbidding any such abuse.
7. To provide assurance that any and all suspected abuse will be reported and fully investigated.

CHILD SAFE PRINCIPLES

Apprenticeships Are Us Ltd commits to the following National Child Safe Principles:

1. Child safety and well-being are embedded in leadership, governance, and culture.
2. Children are empowered and participate in decisions.
3. Families and communities are informed and involved.
4. Equity is upheld – diversity respected.
5. People working with children are suitable and supported.
6. Processes to respond to complaints are child-focused and accessible.
7. Staff are equipped through training and supervision.
8. Physical and online environments minimise harm.
9. Data and privacy protections are applied to child information.
10. Review & continuous improvement is maintained.

POLICY

Apprenticeships Are Us Limited is committed to promoting and protecting the best interests of children involved in its programs. Apprenticeships Are Us Ltd promotes the cultural safety of children from Aboriginal and Torres Strait Islander backgrounds and children from culturally and linguistically diverse communities. This is in line with *the Racial Discrimination Act 1975 and Multicultural NSW Act 2000*, ensuring that all children are supported and respected regardless of their cultural or linguistic background.

All children, regardless of their gender, race, religious beliefs, age, disability, sexual orientation, or family or social background, have equal rights to protection from abuse.

Everyone working at Apprenticeships Are Us Limited is responsible for the care and protection of the children within our care and reporting information about suspected child abuse.

Child protection is a shared responsibility between Apprenticeships Are Us Limited, all employees, workers,

contractors, associates, and members of the Apprenticeships Are Us Limited community.

Apprenticeships Are Us Limited will consider the opinions of children and use their opinions to develop child protection policies.

Apprenticeships Are Us Limited supports and respects all children, staff, and volunteers.

Apprenticeships Are Us Limited is committed to the cultural safety of Aboriginal children, and those from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children living with a disability.

If any person believes a child is at immediate risk of abuse, telephone 000.

OUR STAFF AND VOLUNTEERS

This policy guides our staff and volunteers on how to behave with children in our organisation.

All of our staff and volunteers must agree to abide by our code of conduct which specifies the standards of conduct required when working with children. ARU maintains a Child Safety Code of Conduct, which establishes clear standards of behaviour for any adult interacting with children. Adherence is mandatory and forms part of all contracts, inductions, and performance standards.

ROLES & RESPONSIBILITIES

Board of Directors

- Ensure ARU complies with all child protection laws.
- Monitor systemic risks and conduct annual reviews.
- Act on reportable conduct matters.

Managing Director

- Ensure a robust, compliant, child safety framework.
- Ensure investigations are fair, timely and trauma informed.
- Liaise with regulators where mandatory.

Child Safety Officer (CSO)

ARU appoints a Child Safety Officer responsible for:

- advice and support regarding child safety;
- triaging complaints;
- maintaining risk and incident registers;
- monitoring Host Businesses.

Managers & Supervisors

- Ensure safe environments.
- Enforce compliance.
- Support reporting processes.

Apprentice Employment Managers (AEMs)

- Monitor host sites for child safety risks
- Interview apprentices privately
- Intervene immediately when concerns arise

Host Businesses

- Must comply with child safe obligations
- Must provide a safe environment free from grooming, bullying, harassment or abuse
- Must cooperate fully with ARU investigations

All Employees, Contractors, Volunteers

- Must hold WWCC where applicable
- Must follow the Child Safety Code of Conduct
- Must report concerns immediately

Bystanders

- Have a duty to report child safety concerns.

CHILD SAFETY IN HOST BUSINESSES ENVIRONMENTS

Apprenticeships Are Us Ltd must ensure that Host Businesses:

- provide a child-safe workplace;
- have WWCC obligations in place for relevant staff;
- do not expose apprentices to grooming, harassment, or abuse;
- cooperate with ARU when safety concerns arise;
- allow AEMs unrestricted access to apprentices;
- immediately remove any identified risk to a child.

Where risks arise, ARU may:

- remove the apprentice immediately;
- suspend placements;
- terminate Host arrangements;
- escalate to SafeWork NSW, Police, or the Children's Guardian.

TRAINING AND SUPERVISION

Training and education are important to ensure that everyone in our organisation understands that child safety is everyone's responsibility.

Our organisational culture aims for all staff and volunteers (in addition to parents/carers and children) to feel confident and comfortable in discussing any allegations of child abuse or child safety concerns. We train our staff and volunteers to identify, assess, and minimise risks of child abuse and to detect potential signs of child abuse.

We also support our staff and volunteers through ongoing supervision to develop their skills to protect children from abuse; and promote the cultural safety of Aboriginal children, the cultural safety of children from linguistically

and/or diverse backgrounds, and the safety of children with a disability.

New employees and volunteers will be supervised regularly to ensure they understand our organisation's commitment to child safety and that everyone has a role to play in protecting children from abuse, as well as checking that their behaviour towards children is safe and appropriate (please refer to this organisation's code of conduct to understand appropriate behaviour further).

All new workers will receive a copy (or instructions on where to find a copy) of all children safe policies and procedures and their direct Manager will ensure that the following modules are completed as part of the induction process:

- <https://childsafe.humanrights.gov.au/learning-hub/e-learning-modules>

Any inappropriate behaviour will be reported through appropriate channels, including the relevant State government departments and police, depending on the severity and urgency of the matter.

RECRUITMENT

We take all reasonable steps to employ skilled people to work with children. We develop selection criteria and advertisements which clearly demonstrate our commitment to child safety and an awareness of our social and legislative responsibilities. Our organisation understands that when recruiting staff and volunteers we have ethical as well as legislative obligations.

We actively encourage applications from Aboriginal peoples, people from culturally and/or linguistically diverse backgrounds and people with a disability.

All people engaged in child-related work, including volunteers, are required to hold a valid Working with Children Check in their relevant State of employment, and to provide evidence of this Check.

We carry out reference checks and police record checks to ensure that we are recruiting the right people. Police record checks are used only for the purposes of recruitment and are discarded after the recruitment process is complete. We do retain our own records (but not the actual criminal record) if an applicant's criminal history affected our decision-making process.

If during the recruitment process a person's records indicate a criminal history, then the person will be given the opportunity to provide further information and context.

FAIR PROCEDURES FOR PERSONNEL

The safety and wellbeing of children is our primary concern. We are also fair and just to personnel. The decisions we make when recruiting, assessing incidents, and undertaking disciplinary action will always be thorough, transparent, and based on evidence.

We record all allegations of abuse and safety concerns using our incident reporting form, including investigation updates. All records are securely stored.

If an allegation of abuse or a safety concern is raised, we provide updates to children and families on progress and any actions we as an organisation take.

PRIVACY

All personal information considered or recorded will respect the privacy of the individuals involved, whether they be staff, volunteers, parents or children, unless there is a risk to someone's safety. We have safeguards and practices in place to ensure any personal information is protected.

Apprenticeships Are Us Ltd also complies with the *Privacy Act 1988* and the *Australian Privacy Principles (APPs)*, ensuring that all personal data related to children, staff, and volunteers is securely stored and only accessed by authorized personnel. Digital information is protected through encryption and secure storage methods to prevent unauthorized access.

Everyone is entitled to know how this information is recorded, what will be done with it, and who will have access to it.

LEGISLATIVE RESPONSIBILITIES

Our organisation takes our legal responsibilities seriously, including:

- **Failure to disclose:** Reporting child abuse and neglect is a community-wide responsibility. All adults who have a reasonable belief that an adult has committed an offence against a child under 16 have an obligation to report that information to the police.
- **Failure to protect:** People of authority in our organisation will commit an offence if they know of a substantial risk of child abuse and neglect and have the power or responsibility to reduce or remove the risk but negligently fail to do so.
- Any personnel who are **mandatory reporters** must comply with their duties.

In addition, this policy complies with the *Children's Guardian Act 2019 (NSW)* and the *Child Wellbeing and Safety Act 2005 (Vic)*, which set out clear reporting obligations for organizations that work with children. All staff and volunteers at Apprenticeships Are Us Ltd must adhere to mandatory reporting requirements, ensuring prompt action when the risk of abuse is identified.

RISK MANAGEMENT

Organisations are required to protect children when a risk is identified (see information about failure to protect above). In addition to general occupational health and safety risks, we proactively manage risks of abuse to our children.

We have risk management strategies in place to identify, assess, and take steps to minimise child abuse risks, which include risks posed by physical environments (for example, any doors that can lock, multiple exits), and online environments.

For example, no staff or volunteer is to have contact with a child under 18 on social media including but not limited to – Facebook, LinkedIn, Instagram, TikTok. The only exclusion to this is when a child under 18 follows our organisation pages. Children under 18 who do follow our organisation pages will not be subjected to any inappropriate material.

Images that include any child under 18 will not be used for advertising purposes without parent or guardian permission.

To further ensure the safety of children, Apprenticeships Are Us Ltd adheres to the *Cybersecurity Standards Act 2023*. This includes measures to protect children from risks in online environments, such as inappropriate communication, digital harassment, and privacy breaches. Staff are trained in managing risks posed by digital platforms and are prohibited from engaging with children via personal social media accounts.

ARU maintains a comprehensive risk management approach that includes:

1. Physical Environment Risks

- secluded spaces;
- lockable rooms;
- inadequate supervision;
- unsafe host sites.

2. Psychosocial Risks

- bullying;
- harassment;
- discrimination;
- exposure to adult behaviours inappropriate for children.

3. Digital & Online Risks

- grooming via messaging;
- inappropriate sharing of images;
- social media contact with ARU staff prohibited;
- cyberbullying;
- data breaches.

4. Host Business Risks

- unmanaged environments;
- lack of WWCC;
- poor understanding of child safe obligations.

5. Reporting & Escalation Risks

- failure to report
- delayed response
- inadequate documentation
- poor trauma-informed practice

Controls include:

- safety plans;
- staff training;
- Host Business audits;
- digital protections;
- system-based recordkeeping;
- Child Safety Officer oversight.

PREVENTING GROOMING

Grooming behaviours—whether in-person or online—are strictly prohibited.

Indicators include:

- special attention to a specific child;
- secretive communication;
- gift-giving;
- isolating a child;
- sexualised comments;
- excessive private messaging.

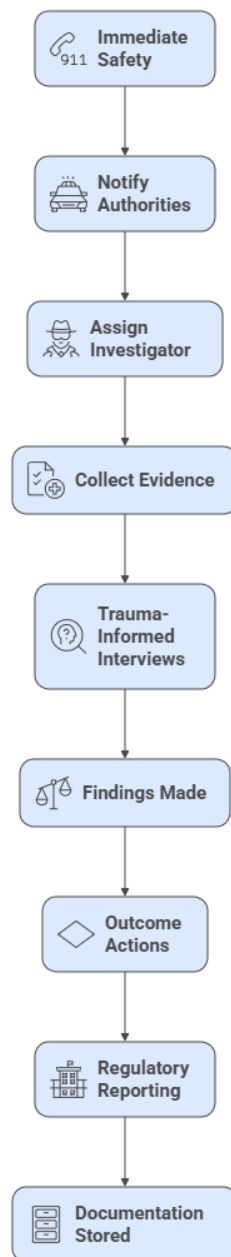
All grooming concerns must be reported immediately to:

- the Child Safety Officer;
- Police (000 or local station);
- the NSW Reportable Conduct Scheme (where applicable).

CHILD SAFETY INVESTIGATION PROCEDURE

1. **Immediate safety first** – child removed from danger.
2. **Notify required authorities** – Police, Child Protection Helpline, Children’s Guardian.
3. **Assign investigator / CSO** – impartial and trained.
4. **Collect evidence** – interviews, documents, digital logs.
5. **Trauma-informed interviews.**
6. **Findings made based on balance of probabilities.**
7. **Outcome actions** may include:
 - i. disciplinary action
 - ii. termination
 - iii. Host Business removal
 - iv. retraining
 - v. policy changes
8. **Regulatory reporting** as required.
9. **Documentation** stored securely under Privacy Act.

ARU Child Safety Investigation Procedure



IMMEDIATE SAFETY MEASURES

ARU may take immediate protective action including:

- temporary or permanent removal of a child from a Host workplace.
- standing down alleged perpetrators.
- adjusting duties or supervision.
- ceasing all contact pending investigation.
- reporting directly to Police or authorities.

This is precautionary and does not imply guilt.

ALLEGATIONS, CONCERNS AND COMPLAINTS

Our organisation takes all allegations seriously and has practices in place to investigate thoroughly and quickly. Our staff and volunteers are trained to deal appropriately with allegations.

We work to ensure all children, families, staff and volunteers know what to do and who to tell if they observe abuse or are a victim, and if they notice inappropriate behaviour.

Apprenticeships Are Us Ltd also provides whistleblower protections under the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2024*, ensuring that individuals who report child safety concerns can do so confidentially and without fear of retaliation. All complaints will be thoroughly investigated, and appropriate action will be taken based on the findings.

We all have a responsibility to report an allegation of abuse if we have a reasonable belief that an incident took place (see information about failure to disclose above).

If an adult has a **reasonable belief** that an incident has occurred, then they must report the incident. Factors contributing to reasonable belief may be:

- a child states they or someone they know has been abused (noting that sometimes the child may in fact be referring to themselves).
- behaviour consistent with that of an abuse victim is observed.
- someone else has raised a suspicion of abuse but is unwilling to report it.
- observing suspicious behaviour.

RECORDKEEPING & INFORMATION SHARING

ARU must:

- maintain secure digital child safety records.
- record all allegations, risk assessments and outcomes.
- store information for 7+ years.
- share information with authorities as required under:
 - i. Children's Guardian Act
 - ii. Crimes Act
 - iii. Care and Protection Act
 - iv. Reportable Conduct Scheme

Child information must only be accessed by authorised personnel.

REGULAR REVIEW

This policy will be reviewed every two years and following significant incidents if they occur. We will ensure that families and children have the opportunity to contribute. Where possible we do our best to work with local Aboriginal communities, culturally and/or linguistically diverse communities, people with a disability, lesbian, gay, bisexual, transgender, and intersex children.

As part of the *National Standards for Group Training Organisations*, Apprenticeships Are Us Ltd conducts regular reviews of child safety policies, including after significant incidents or legislative updates. Feedback from children, families, and staff is actively sought to inform improvements in policy and practice.

AUTHORISATION

Michael Wentworth



Managing Director

Apprenticeships Are Us Limited

DOCUMENT CONTROL

Version	Authorised by	Authorisation Date	Sections	Amendment
1.1			All	N/A
1.2	M. Wentworth	01/02/2018	All	Change of CEO
1.3	M. Wentworth	29/10/2024	All	Cover page, minor information update
1.4	M. Wentworth	25/11/2025	All	Information update