

Apprenticeships
Are Us



CHILD SAFETY PROCEDURES

LEGISLATIVE & GOVERNANCE FRAMEWORK

These procedures are governed by the following legislation, standards and regulatory frameworks:

Commonwealth

- National Principles for Child Safe Organisations (2019)
- Criminal Code Act 1995 (Cth) – online exploitation offences
- Privacy Act 1988 (Cth)
- Cybersecurity Standards Act 2023 (Cth)
- Fair Work Act 2009 (Cth) – workplace bullying jurisdiction
- ACNC Governance Standards – Standard 1, 2, 5

NSW (Primary Jurisdiction)

- Children’s Guardian Act 2019
- Child Protection (Working with Children) Act 2012
- Child Safe Scheme (2022–23 legislative reforms)
- Child Wellbeing and Safety Act 2005 (relevant in VIC)
- Crimes Act 1900 NSW – grooming, sexual offences, assault
- Mandatory Reporter legislation

GTO Standards

- National Standards for Group Training Organisations (2017)
 - Standard 2.2 – Child safety requirements
 - Standard 3 – Risk management
 - Standard 1 – Governance obligations

Internal Governance Instruments

- ARU Child Safety Policy
- ARU Child Safe Code of Conduct
- ARU Privacy & Confidentiality Policy
- ARU Cyber Safety & Digital Communications Policy
- ARU Complaints & Investigation Policy

RESPONSIBILITIES

The Board of Apprenticeships Are Us Limited has ultimate responsibility for the detection and prevention of child abuse and is responsible for ensuring that appropriate and effective internal control systems are in place. The Board is also responsible for ensuring that appropriate policies and procedures and a Child Safety Code of Conduct are in place.

This document complies with the National Standards for Group Training Organisations (Standard 2.2), which mandates the monitoring of child safety within GTO operations. Apprenticeships Are Us Ltd (ARU) ensures that apprentices and trainees are protected from harm, including in all Host Business environments. This involves regularly reviewing child safety practices, reporting systems, and staff training.

The Managing Director of Apprenticeships Are Us Limited is responsible for:

- Dealing with and investigating reports of child abuse.

- Ensuring that all staff, contractors, and volunteers are aware of relevant laws, organisational policies and procedures, and the organisation's Code of Conduct.
- Ensuring that all adults within the Apprenticeships Are Us Limited community are aware of their obligation to report suspected abuse of a child in accordance with these policies and procedures.
- Ensuring that all staff, contractors, and volunteers are aware of their obligation to observe the Code of Conduct (particularly as it relates to child safety).
- Providing support for staff, contractors, and volunteers in undertaking their child protection responsibilities.

Apprenticeships Are Us Ltd ensures that all child safety policies and procedures are culturally competent and inclusive. This includes providing training to staff and volunteers to appropriately support Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, and children with disabilities, as per the *Racial Discrimination Act 1975*.

All managers must ensure that they:

- Promote child safety at all times.
- Assess the risk of child abuse within their area of control and eradicate or minimise any risk to the extent possible.
- Educate employees about the prevention and detection of child abuse; and
- Facilitate the reporting of any inappropriate behaviour or suspected abusive activities.

Management should be familiar with the types of abuse that might occur within their area of responsibility and be alert for any indications of such conduct.

All staff/volunteers/contractors share the responsibility for the prevention and detection of child abuse, and must:

- Familiarise themselves with the relevant laws, the Child Safe Code of Conduct, and Apprenticeships Are Us Limited policy and procedures in relation to child protection and comply with all requirements.
- Report any reasonable belief that a child's safety is at risk to the relevant authorities (such as the police and/or the state-based child protection service) and fulfil their obligations as mandatory reporters.
- Report any suspicion that a child's safety may be at risk to their supervisor (or, if their supervisor is involved in the suspicion, to a responsible person in the organisation); and
- Provide an environment that is supportive of all children's emotional and physical safety.

SUMMARY OF RESPONSIBILITIES

Board of Directors

- Ensure a functioning Child Safe System.
- Approve and oversee annual child safety audits.
- Ensure Reportable Conduct obligations are met.
- Monitor Host Business compliance.

Managing Director

- Lead implementation of Child Safety policies.
- Oversee investigations and mandatory reporting.
- Ensure staff training & supervision.
- Approve child safety risk assessments.

Child Safety Officer

- Maintain child safety risk register.
- Lead detection, triage and response to concerns.
- Liaise with NSW Office of the Children's Guardian.
- Support apprentices and families.

Managers

- Promote a safe environment in all operations.
- Identify, assess and mitigate child-related risks.
- Support staff to meet reporting obligations.

AEMs (Apprentice Employment Managers)

- Conduct Host Business child safety checks.
- Conduct apprentice wellbeing conversations.
- Identify grooming or psychosocial risks early.
- Respond immediately to concerns.

Host Businesses

- Provide a child-safe workplace.
- Ensure all supervisors hold relevant WWCCs.
- Remove any identified risk immediately.
- Cooperate with ARU investigations.

All Staff, Contractors & Volunteers

- Comply with the Child Safe Code of Conduct.
- Report all concerns immediately.
- Undertake ongoing child safety training.

CHILD SAFE PRINCIPLES

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

1. Leadership, governance and culture prioritise child safety.
2. Children and young people are empowered and participate.
3. Families and communities are informed and involved.
4. Diversity and equity are upheld.
5. People working with children are suitable and supported.
6. Processes to respond to complaints are accessible, child-centred and culturally safe.
7. Staff receive ongoing education and training.
8. Physical and online environments minimise risk.
9. Privacy, data security and information sharing comply with legislation.
10. Child safety is continuously reviewed and improved.

DEFINITIONS

Child means a person below the age of 18 years unless, under the law applicable to the child, the majority is attained earlier.

Child protection means any responsibility, measure or activity undertaken to safeguard children from harm.

Child abuse means all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect, or negligent treatment, commercial (e.g., for financial gain) or other exploitation of a child and includes any actions that results in actual or potential harm to a child.

Child sexual assault is any act which exposes a child to, or involves a child in, sexual processes beyond his or her understanding or contrary to accepted community standards. It includes child grooming, which 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.

Reasonable grounds for belief are a belief based on reasonable grounds (see below) that child abuse has occurred when all known considerations or facts relevant to the formation of a belief are taken into account and these are objectively assessed. Circumstances or considerations may include the source of the allegation and how it was communicated, the nature of and details of the allegation, and whether there are any other related matters known regarding the alleged perpetrator.

A reasonable belief is formed if a reasonable person believes that:

- a) the child is in need of protection,
- b) the child has suffered or is likely to suffer "significant harm as a result of physical injury," or
- c) the parents are unable or unwilling to protect the child.

A '*reasonable belief*' or a 'belief on reasonable grounds' is not the same as having proof but is more than mere rumour or speculation.

A '*reasonable belief*' is formed if a reasonable person in the same position would have formed the belief on the same grounds. For example, a 'reasonable belief' might be formed if:

- a) a child states that they have been physically or sexually abused.
- b) a child states that they know someone who has been physically or sexually abused (sometimes the child may be talking about themselves).
- c) someone who knows a child states that the child has been physically or sexually abused.
- d) professional observations of the child's behaviour or development leads a professional to form a belief that the child has been physically or sexually abused or is likely to be abused; and/or
- e) signs of abuse lead to a belief that the child has been physically or sexually abused.

EMPLOYMENT OF NEW PERSONNEL

Apprenticeships Are Us Limited undertakes a comprehensive recruitment and screening process for all workers and volunteers that aims to:

- promote and protect the safety of all children under the care of the organisation.
- identify the safest and most suitable people who share Apprenticeships Are Us Limited values and commitment to protect children; and
- prevent a person from working at Apprenticeships Are Us Limited if they pose a risk to children.

Apprenticeships Are Us Limited requires all workers/volunteers to pass through the organisation's recruitment and screening processes prior to commencing their engagement with Apprenticeships Are Us Limited.

Apprenticeships Are Us Limited may require applicants to provide a police check in accordance with the law and as appropriate before they commence working at Apprenticeships Are Us Limited and during their time with Apprenticeships Are Us Limited at regular intervals.

Apprenticeships Are Us Limited will undertake thorough reference checks as per the approved internal procedure.

Once engaged, workers/volunteers must review and acknowledge their understanding of child safety policies and procedures.

All employees, volunteers, and contractors must undergo a Working with Children Check (WWCC) or equivalent in accordance with state-based legislation, such as the *Working with Children Act 2005 (Vic)*. Additionally, all personnel must complete child safety training prior to commencing their roles and at regular intervals during their engagement with Apprenticeships Are Us Ltd.

ARU must conduct:

- Identity verification
- WWCC verification through government portal
- Police checks
- Right-to-work checks
- Professional reference checks
- Director ID (if applicable for governance roles)
- Ongoing WWCC re-checking
- Digital footprint review (social media risk indicators)

HOST BUSINESS CHILD SAFETY VERIFICATION

Before placing an apprentice aged under 18 with a Host Business, ARU must:

1. Validate Working with Children Checks for relevant supervisors.
2. Conduct a Child Safety Risk Assessment of the site.
3. Confirm the Host has child safe policies or agrees to ARU's.
4. Check for history of complaints, WHS breaches, or misconduct.
5. Document monitoring schedule in Workforce One.

If a Host fails any requirement:

- placement is paused
- additional controls are applied, or
- Host is deemed unsuitable

AEMs must document all host contacts and safety observations.

RISK MANAGEMENT

Apprenticeships Are Us Limited will ensure that child safety is a part of its overall risk management approach.

Apprenticeships Are Us Limited will have a risk and compliance sub-committee committed to identifying and managing risks at Apprenticeships Are Us Limited.

Risk and compliance sub-committee members will receive regular training in relation to child safety.

In addition to physical safety, cyber safety is also a priority for Apprenticeships Are Us Ltd. The organisation complies with the *Cybersecurity Standards Act 2023* to protect children in online environments. This includes ensuring that all digital interactions involving children are monitored, and no inappropriate contact is made through social media or other digital platforms.

RISK MANAGEMENT PROCEDURES

1. Identify Risks

- grooming risks;
- Host Business environments;
- online environments;
- psychosocial risks (bullying, isolation);
- physical space risks;
- transportation risks.

2. Assess Risks

Each identified risk must be rated for:

- likelihood;
- impact;
- vulnerability of the child;
- adequacy of controls.

3. Control Risks

Controls may include:

- increased supervision;
- removal from unsafe host site;
- restricting one-on-one adult/child interactions;
- digital monitoring;
- staff rotation.

4. Monitor & Review

- Annual child safety audits;
- Reviews after every reportable incident;
- Host Business re-assessments.

Cyber Safety Controls

As per Cybersecurity Standards Act 2023:

- monitor email and messaging interactions;
- prohibit private social media contact;
- maintain system access logs;
- restrict use of personal devices.

GROOMING PREVENTION

All adults must avoid behaviours that could constitute grooming, including:

- building special relationships with a child
- private messaging or online interactions
- gift-giving
- isolating a child
- providing transport without approval
- sexualised comments

Any grooming concern must be reported immediately to the Child Safety Officer and Police.

REPORTING

Any staff member, volunteer or contractor who has grounds to suspect abusive activity must immediately notify the appropriate child protection service or the police. They must also advise their supervisor about their concern.

In situations where the supervisor is suspected of involvement in the activity, or if the person having the suspicion does not believe that the matter is being appropriately addressed or dealt with, the matter must be reported to the next highest level of supervision.

Whistleblower protections under the *Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2024* ensure that any staff, volunteers, or contractors who report suspected child abuse or misconduct are protected from retaliation. Complaints can be made confidentially through designated reporting channels, and all concerns will be thoroughly investigated.

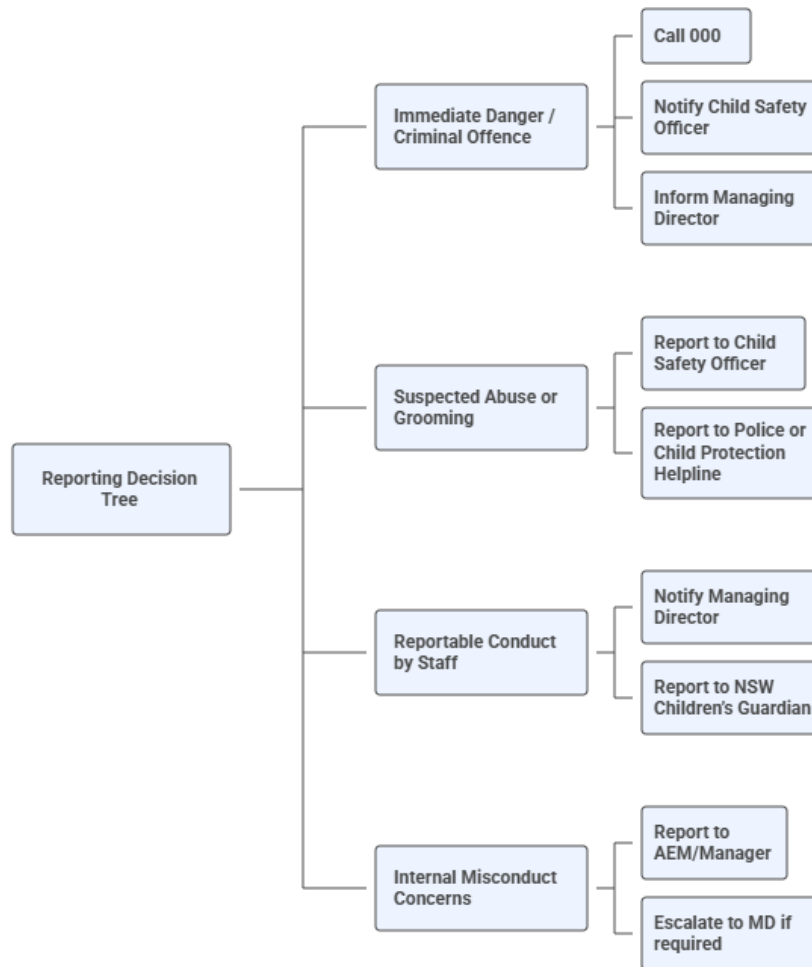
Supervisors must report complaints of suspected abusive behaviour or misconduct to the Managing Director and to any external regulatory body such as the police. This policy aligns with the *Children's Guardian Act 2019 (NSW)* and the *Child Wellbeing and Safety Act 2005 (Vic)*, which outline mandatory reporting obligations for organisations working with children. It is essential that all personnel comply with these laws by reporting any suspicion of abuse to the appropriate authorities

The tables below include the contact details and reporting guidelines of the reporting authority in each Australian state and territory:

- **Australian Capital Territory** https://www.communityservices.act.gov.au/ocyfs/keeping-children-and-young-people-safe#_howto
- **New South Wales** <https://www.facs.nsw.gov.au/families/Protecting-kids/reporting-child-at-risk>
- **Northern Territory** <https://nt.gov.au/law/crime/report-child-abuse>
- **Queensland** <https://www.cyjma.qld.gov.au/protecting-children>
- **South Australia** <https://www.sa.gov.au/topics/education-and-learning/health-and-wellbeing/child-abuse/report-child-abuse>
- **Tasmania** <https://www.decyp.tas.gov.au/children/child-safety-service/>
- **Western Australia** <https://www.wa.gov.au/organisation/departments-of-communities/child-protection>

REPORTING DECISION TREE

ARU Reporting Decision Tree for Child Safety



INVESTIGATING

If the appropriate child protection service or the police decide to investigate a report, all employees, contractors, or volunteers must co-operate fully with the investigation.

Whether or not the authorities decide to conduct an investigation, the Managing Director will consult with the authorities to determine whether an internal investigation is appropriate. If it is decided that such an investigation will not conflict with any proceeding of the authorities, the Managing Director may decide to conduct such an investigation. All employees, contractors and volunteers must co-operate fully with the investigation.

Any such investigation will be conducted according to the rules of natural justice. The Managing Director will make every effort to keep any such investigation confidential; however, from time-to-time other members of staff may need to be consulted in conjunction with the investigation.

After an initial review and a determination that the suspected abuse warrants additional investigation, the Managing Director shall coordinate the investigation with the appropriate investigators and/or law enforcement officials. Internal or external legal representatives will be involved in the process, as deemed appropriate.

IMMEDIATE SAFETY MEASURES

ARU may:

- remove a child from a Host site
- reassign supervisors
- prevent contact between parties
- implement additional supervision
- suspend alleged perpetrator pending outcome
- cease host placement

These measures do not imply guilt.

RESPONDING

If it is alleged that a member of staff, contractor or a volunteer may have committed an offence or have breached Apprenticeships Are Us Limited policies or its Code of Conduct the person concerned may be stood down (with pay, where applicable) while an investigation is conducted.

If the investigation concludes that on the balance of probabilities an offence (or a breach of Apprenticeships Are Us Limited or Code of Conduct) has occurred then disciplinary action may follow, up to and including dismissal or cessation of involvement with Apprenticeships Are Us Limited. The findings of the investigation will also be reported to any external body as required.

PRIVACY

All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. Apprenticeships Are Us Limited will have safeguards and practices in place to ensure any personal information is protected.

Everyone is entitled to know how the personal information is recorded, what will be done with it, and who will be able to access it.

CHILD AND FAMILY ENGAGEMENT

Where appropriate and safe, ARU will:

- communicate with families regarding child safety concerns
- provide information about rights and reporting options
- offer support services
- include family feedback in child safety reviews

REVIEWING

Every two years, and following every reportable incident, a review shall be conducted to assess whether Apprenticeships Are Us Limited child protection policies or procedures require modification to better protect the children under the organisation's care.

As part of the National Standards for Group Training Organisations, Apprenticeships Are Us Ltd reviews its child safety procedures on an annual basis and after any reportable incident. These reviews incorporate feedback from children, families, staff, and volunteers, ensuring that the organisation remains compliant with evolving legal obligations and best practices.

RELATED DOCUMENTS

- *Child Safe Code of Conduct*
- *Child Protection Policy*
- *Child Safety Statement*
- *The law of the Commonwealth or of the relevant state or territory*

AUTHORISATION

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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