1.15 Child Safety

PURPOSE

This policy has been developed to ensure that Construction Training Group Pty Ltd (CTG) complies with the legislation and standards in relation to protecting *children and young people** undertaking their courses at CTG and/or attending CTG's premises from harm and abuse. CTG occasionally enrols students under the age of 18 (not less than 16 years of age) in some of its courses (but does not provide day to day training services to children and young people). CTG endeavours to create an environment where children and young people are safe and feel safe. CTG will achieve its commitment to child safety and other child safety objectives by thorough screening workers, monitoring child safety practices and stakeholder behaviours, prompt identification of risks and promptly addressing complaints and concerns.

**Children and young people – including Aboriginal and/or Torres Strait Islander children, children with a disability, children who identify themselves as lesbian, gay, bisexual, trans and/or intersex, children from culturally and linguistically diverse backgrounds, other vulnerable children (refugees, from foster/home care/youth justice systems).*

SCOPE

This policy applies to all CTG staff and contractors whether or not they work in direct contact with children or young people.

CTG staff, contractors and volunteers must identify and report to the management the following indicators of child abuse. Please note that physical harm may also be caused by student fights or bullying.
All CTG staff and contractors must be aware of various types of child abuse. (Reference: Victoria State Government – Education and Training – Identify child abuse)

Child sexual abuse *is when a person uses power or authority over a child to involve them in sexual activity and can include a wide range of sexual activity including:*

- *fondling the child's genitals*
- *oral sex*
- *vaginal or anal penetration by a penis, finger or another object*
- *exposure of the child to pornography.*

Child sexual abuse may not always include physical sexual contact and can also include non-contact offences, such as:

- *talking to a child in a sexually explicit way*
- *sending sexual messages or emails to a child*
- *exposing a sexual body part to a child*
- *forcing a child to watch a sexual act (including showing pornography to a child)*
- *having a child pose or perform in a sexual manner (including child sexual exploitation).*

Physical child abuse *can consist of any non-accidental infliction of physical violence on a child by any person.*

Physical indicators of physical child abuse include (but are not limited to):

- *bruises or welts on facial areas and other visible areas of the body.*
- *bruises or welts in unusual configurations*
- *bruises or welts that look like the object used to make the injury (for example fingerprints, handprints, buckles, iron, or teeth)*
- *burns from boiling water, oil, or flames*
- *burns that show the shape of the object used to make them (for example, iron, grill, or a cigarette)*
- *fractures of the skull, jaw, nose, or limbs - especially those not consistent with the explanation offered, or the type of injury not possible at the child's age of development*
- *cuts and grazes to the mouth, lips, gums, eye area, ears*
- *bald patches where hair has been pulled out*
- *multiple injuries - old and new*
- *effects of poisoning*

Behavioural indicators of physical child abuse include (but are not limited to):

- *disclosure of an injury inflicted by someone else (parent, carer, or guardian)*
- *an inconsistent or unlikely explanation, or inability to remember the cause of injury*
- *unusual fear of physical contact with adults*
- *aggressive behaviour*
- *disproportionate reaction to events*
- *wearing clothes unsuitable for weather conditions to hide injuries*
- *wariness or fear of a parent, carer, or guardian*
- *reluctance to go home*
- *habitual absences from class without reasonable explanation*
- *overly compliant, shy, withdrawn, passive, or uncommunicative*
- *unusually nervous, hyperactive, aggressive, disruptive, or destructive to self or others*
- *fear of the dark*
- *drug or alcohol misuse, suicidal thoughts, or self-harm.*

Grooming *is a criminal offence. It occurs when an adult engages in predatory conduct to prepare a child for sexual abuse at a later time. Grooming can include:*

- *communicating or attempting to befriend*
- *establish a relationship or other emotional connection with the child, their parent, or carer.*

Emotional child abuse *occurs when a child is repeatedly rejected, isolated, or frightened by threats, or by witnessing family violence. It also includes hostility, derogatory name-calling and put-downs, and persistent coldness from a person, to the extent that the child suffers, or is likely to suffer, emotional or psychological harm to their physical or developmental health. Emotional abuse may occur with or without other forms of abuse.*

© Construction Training Group

***Neglect** includes a failure to provide the child with an adequate standard of nutrition, medical care, clothing, shelter, or supervision to the extent that the health or physical development of the child is significantly impaired or placed at serious risk.*

REFERENCE DOCUMENTATION

Includes but not limited to the following:

- Worker Screening Act 2020 (Vic)
- Child Safe Standards (abbreviated to CSS in this document)
- Children, Youth and Families Act 2005 (Vic)
- Child Wellbeing and Safety Act 2005 (Vic)
- National Principles for Child Safe Organisations

RELATED DOCUMENTATION

Read in conjunction with CTG's procedures on:

- Worker screening and working with children checks
- Receiving course fee from applicants under the age of 18
- Student Code of Conduct
- Staff Code of Conduct
- Student support
- Anti-discrimination
- VRQA Guidelines for VET Providers: Guideline 6 – Child Safe Standards.

CHILD SAFE PROCEDURES

RTO governance and leadership

1. CTG requires all staff and contractors, including management and board members, to read and acknowledge this policy document and comply with the Child Safety Policy and relevant legislation and standards. (CSS 11.1, 11.4, 11.5)
2. All personnel must support CTG's commitment to ensuring child safety. (CSS 2.1)
3. Where required, CTG's practices and processes will be informed by the input of children and young people and their families/carers. (CSS 4.4, 11.3)
4. CTG ensures that this policy document and any relevant policies and procedures are made available to all children, young people, their families/carers and communities via its website. (CSS 4.2, 4.4, 11.2)
5. CTG welcomes any questions from children, young people, their families/carers and communities prior to enrolment, during recruitment and their studies at CTG. (CSS 3.5, 11.3)
6. CTG is committed, wherever possible, to providing support and responding to those who are vulnerable. (CSS 5.1)

7. CTG will ensure ongoing supervision and people management that is focused on child safety and wellbeing, i.e. worker screening, monitoring staff behaviors towards children, young people, their families/carers. (CSS 6.4)
8. CTG promotes active internal and external discussions on a work culture of child safety and welfare of children and young people. (CSS 4.2, 11.3)
9. CTG's has in place, risk management procedures which takes into account risks posed by organisational settings and activities, both online and physical, internal and external (including third party involvements and relevant written legal agreements, if any), with emphasis on the safety and privacy of children and young people, i.e. clearly established selection criteria for each course, worker screening procedures, training delivery site inspections/audits to ensure safety. (CSS 9.2, 9.3, 9.4, 11.1)
10. CTG will respond to any concerns or complaints of child harm or abuse promptly in accordance with the document '*Four critical actions for VET and higher education providers - Responding to Incidents, Disclosures and Suspicions of Child Abuse*'
11. CTG will notify the Social Services Regulator (SSR) of any reportable allegations made against its workers or volunteers in accordance with the Victorian Reportable Conduct Scheme under the Child Wellbeing and Safety Act 2005. This obligation applies regardless of whether the alleged reportable conduct occurred within Victoria, interstate or overseas, including where the allegation is received from outside Victoria. Reference: https://www.vic.gov.au/information-sheet-7-reporting-social-services-regulator
12. CTG Director must notify the SSR within three business days of becoming aware of a reportable allegation and provide further information within 30 calendar days. CTG will investigate reportable allegations, manage any risks to children and notify the SSR of the investigation findings and any actions taken, in accordance with the Scheme's requirements.
13. CTG also embeds the Child and Youth Engagement Framework developed by the Commission for Children and Young People into its child safety practices. Staff and contractors must apply the following engagement principles when interacting with or making decisions that affect children and young people:
    - Culture is key — respect cultural identity and safety, particularly Aboriginal and Torres Strait Islander children.
    - Leave ego at the door — prioritise children's voices over adult convenience.
    - Ensure informed consent and confidentiality.
    - Do no harm — act in ways that protect wellbeing.
    - Listen to children and young people.
    - Understand the 'why' and the 'who' before decisions are made.
    - Be genuine and transparent.
    - Partner with children, young people, parents, guardians, Elders and relevant organisations and stakeholders, wherever possible.
    - Practise open and regular communication.
    - Adapt, innovate and evolve based on feedback.
    - Be inclusive and create culturally safe environments.
    - Recognise, remunerate and celebrate contributions.

RTO environment and work culture

1. CTG has developed a safe, inclusive and supportive environment that promotes open communication and fair treatment. (CSS 1.4)
2. Where practical, CTG will ensure children and young people are allowed to express their culture and enjoy their cultural rights (without compromising safety when undertaking training and assessment). CTG expects and encourages all members to acknowledge and appreciate the strengths of all cultures including the Aboriginal and/or Torres Strait Islander culture. (CSS 1.1, 1.2, 1.4)
3. CTG is vigilant in ensuring proper risk management processes (i.e. if there are potential risks to children and young people and will take a risk management approach by undertaking preventative measures). (CSS 2.5)
4. Students are encouraged to disclose any inappropriate behaviours from peers, trainers, CTG staff and other personnel at CTG premises to CTG management representative. CTG will offer access to sexual abuse prevention programs and relevant related information for children and young people, where appropriate.
5. Child sexual abuse does not always involve force. In some circumstances, a child may be manipulated into believing that they have brought the abuse on themselves, or that the abuse is an expression of love, through a process of grooming. (CSS 3.3)
6. CTG's work culture encourages all staff, students and relevant stakeholders to raise and discuss concerns making it more difficult for child abuse to occur and remain hidden.
7. CTG has anti-discriminatory policies and procedures in place. CTG does not tolerate any forms of racism, discrimination, misconduct, libel, slander, harassment, isolation and bias. (CSS 1.3, 2.1)
8. CTG does not tolerate bullying/harassment or any activity which impacts a child's safety, well-being, privacy, access to information or social activities, both online and physical. (CSS 9.2)
9. CTG pays particular attention to the needs of children and young people with disability, children and young people from culturally and linguistically diverse backgrounds, children and young people with diverse sexual orientation and who are unable to live at home. (CSS 5.3)
10. Aboriginal and/or Torres Strait Islander are encouraged to enrol in CTG's courses. CTG promotes a culturally safe environment for Aboriginal and/or Torres Strait Islander children and young people. CTG will pay attention to the needs of Aboriginal children and young people and address these needs within its capacity and/or in consultation with relevant Aboriginal and/or Torres Strait Islander support organisations/personnel/local community elders (CSS 1.4, 1.5, 2.1, 5.4)
11. All children and young people and their families are welcomed to express their views, participate in decision-making and raise their concerns. (CSS 1.4, 3.6, 4.1)
12. Where practical, CTG will organize periodic sessions with families, carers and communities to provide information regarding its child safety practice, operations and governance as well as seek feedback on related policies and procedures (CSS 4.2, 4.3, 4.4)
13. CTG promotes friendship amongst children and young people and nurtures an environment where it is recognized and supported by their peers. (CSS 3.2)

14. CTG will periodically conduct sessions/provide access to information to children and young people including but not limited to the following topics:
    a. their rights, especially with respect to safety, information and participation (CSS 3.1)
    b. importance sexual abuse prevention programs and related information in an age-appropriate manner. (CSS 3.3)
    c. importance of friendship and how to be supportive of it (CSS 3.2)
    d. support and complaints process (CSS 5.2, 7.1)

RTO staffing

1. CTG will take all reasonable steps to ensure that it engages the most suitable and appropriate people to work with children. All staff are required to maintain a valid Working with Children Check. (CSS 2.1, 6.1, 6.2)
2. CTG encourages child and parent/carer involvement and engagement that informs safe operations of the organisation and builds the capability of children and parents/carers to understand their rights and their responsibilities. (CSS 2.1, 4.2)
3. CTG's management ensures that all staff and contractors demonstrate appropriate behaviours in protecting children and young people from abuse and neglect and ensure they have a clear awareness of the difference between appropriate and inappropriate behaviour towards children and young people (no grooming behaviour, no abuse, no violence, no neglect, no exposure to inappropriate content or profanity). CTG's Student Code of Conduct document will provide the necessary guidance in this matter. (CSS 2.1, 2.2, 2.4, 11.5)
4. CTG will promote understanding of the diverse circumstances of the child and young people amongst their staff and contractors and encourage them to provide the necessary support for the vulnerable. (CSS 5.1)
5. CTG will periodically conduct trainings/provide access to information to its staff and contractors on various topics including but not limited to:
    a. respect, understanding and acknowledging the Aboriginal culture
    b. child safety and wellbeing policies and procedures and how to provide the required support (CSS 8.1, 8.3)
    c. provide a culturally safe environment for all children and young people and promote diversity (CSS 8.4)
    d. looking out for signs of harm and vulnerability in children and young people and encourage them to raise their concerns (CSS 3.4, 8.2)
    e. identify online and physical risks to children and young people and how to handle/mitigate these (CSS 9.1)
    f. facilitate child-friendly ways for children and young people to open up and express their views (CSS 3.4, 3.5)
    g. responsibilities towards children and young people (CSS 6.3)
    h. record keeping, information sharing and reporting obligations (CSS 6.3)
    i. complaints and complaint handling policy and procedure (CSS 7.1, 7.2)

Complaints and feedback management

1. CTG has implemented a complaint handling process. (CSS 7.1, 7.4)
2. All students, including children and young people and relevant stakeholders, are encouraged to read the complaints policy and procedure posted on the website and clarify their concerns. (CSS 7.1, 7.2, 7.3)
3. Complaints and feedback from all students are taken seriously and responded to promptly and thoroughly. (CSS 7.3)
4. CTG will report and cooperate with relevant authorities depending on the gravity of the complaints and feedback irrespective of the reporting obligations.
5. CTG will periodically analyse and identify areas of improvement based on the complaints, feedback and their outcomes and changes/updates would be made to relevant policies and procedures. (CSS 10.1, 10.2)
6. Where required, staff, contractors, children and young people and their families and communities would be informed of these changes and outcomes. (CSS 10.3)

Privacy, confidentiality and reporting requirements (CSS 7.5)

1. Student's privacy and confidentiality must be protected at all times. CTG staff must contact the SSR for information and advocacy services, if any concerns.
2. CTG only collects, uses and discloses information about children and their families in accordance with Victorian privacy law and other relevant laws.
3. All staff must comply with CTG's procedures underpinning information sharing and recordkeeping. (CSS 2.6)
4. CTG will comply with all mandatory reporting requirements and co-operate with law enforcement and relevant authorities in ensuring child safety and culturally safe practices.

Review of child safe practices

1. CTG will review, evaluate and improve child safe practices ongoingly or at least annually.
2. Complaint register and feedback from students/stakeholders will be considered to identify systemic failures in ensuring and complying with child safe practices.
3. Continuous improvement opportunities arising from regulatory updates, audits, complaints, staff meetings and stakeholder feedback will be addressed.
4. CTG staff, contractors, volunteers, students and families/guardians will be informed of review processes and relevant outcomes.

© Construction Training Group