

AUSTRALIAN INSTITUTE of INTERNATIONAL UNDERSTANDING (AIIU)

CHILD SAFETY POLICY

The Australian Institute of International Understanding (AIIU) acknowledges the Traditional Owners of Country throughout the nation and recognises their continuing connection to lands, waters, sky and cultures. We pay our respects to Elders, children and young people of past, current and future generations as the holders of the memories, the traditions, the culture and the spiritual wellbeing of the Aboriginal and Torres Strait Islander peoples across the nation. AIIU acknowledges the important role of Aboriginal people and culture within the broader Australian community, and the Strength, Resilience and Endurance of the Stolen Generations Survivors.

INTRODUCTION

This Child Safety Policy supports AIIU to create and maintain a child safe organisation where children and young people are safe and feel safe. The policy provides a framework for how AIIU approach child safety.

All AIIU community members are responsible for caring for children and young people, positively promoting their wellbeing and protecting them from any harm or abuse.

The Child Safety Policy tells the relevant community about the strategies and arrangements in place to keep children safe, helping create a shared commitment to keeping children safe. It will also support everyone in your AIIU to know their responsibilities.

UNDERSTANDING the CHILD SAFE STANDARDS

Australia's contemporary child safety framework was fundamentally shaped by the findings of the Royal Commission into Institutional Responses to Child Sexual Abuse (2013–2017). The Royal Commission identified systemic failures across many sectors and recommended the establishment of nationally consistent child safe standards to better protect children in organisational settings.

In response, all Australian governments endorsed the National Principles for Child Safe Organisations in 2019. These Principles provide a nationally agreed benchmark for organisations that work with or provide services to children and young people. Western Australia has adopted the National Principles as the overarching child safe framework. Rather than introducing a single standalone Child Safe Standards Act, WA implements the Principles through a combination of existing legislation, regulatory expectations and sector-specific requirements..

THE NATIONAL CHILD SAFE PRINCIPLES (WA)

Principle 1

Child safety and wellbeing is embedded in organisational leadership, governance and culture.

Organisations must demonstrate visible leadership commitment and accountability for child safety at all levels.

Principle 2

Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

Children must be empowered, listened to and supported to raise concerns safely.

Principle 3

Families and communities are informed and involved in promoting child safety and wellbeing.

Organisations must actively engage parents, carers and communities as partners in safeguarding.

Principle 4

Equity is upheld and diverse needs respected in policy and practice.

Child safety approaches must recognise and respond to cultural, linguistic, disability and gender diversity.

Principle 5

People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

Robust recruitment, screening, supervision and training must ensure only appropriate persons work with children.

Principle 6

Processes to respond to complaints and concerns are child focused.

Organisations must have clear, accessible, timely procedures for handling concerns and allegations.

Principle 7

Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

Continuous training must build workforce capability to recognise and respond to risks.

Principle 8

Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

Organisations must identify and mitigate environmental and digital risks.

Principle 9

Implementation of the national child safe principles is regularly reviewed and improved.

Safeguarding systems must be monitored, evaluated and strengthened over time.

Principle 10

Policies and procedures document how the organisation is safe for children and young people.

Clear, accessible and operational documentation must underpin child safe practice.

In Western Australia, Student Exchange Organisations must demonstrate comprehensive alignment with the National Principles and relevant state legislation. Effective child safety practice requires not only compliant policies but also strong governance, active monitoring, and a culture that prioritises the wellbeing of every child and young person.

STATEMENT OF COMMITMENT

At AIIU we hold the care, safety and wellbeing of children and young people as a primary and fundamental responsibility.

AIIU, schools, and affiliated third-party partner organisations have a moral, legal and mission-driven responsibility to create nurturing environments where children and young people are respected, their voices are heard, and they are safe and feel safe.

The health, welfare and safety of all children in care are paramount. AIIU, schools, and affiliated organisations will act on behalf of children to protect their rights to safety and security following legal and regulatory requirements. In cases of suspected child abuse and other welfare concerns, staff will report to the appropriate authorities. All staff working with children take on a duty of care to ensure that all children are protected and safe from harm.

AIIU, schools, and affiliated organisations will nominate a person or persons to oversee Child Safety as part of their role in the organsation. This person/s must be up to date with child safety requirements and able to promote and effectively communicate with a range of stakeholders.

AIIU has specific policies, procedures and training that support our leadership team, staff, volunteers, host families and students to achieve these commitments.

UNDERSTANDING LEGISLATIVE CONTEXT

Child Safe Organisations (Reportable Conduct) Act 2022 (WA)

The Act establishes a reportable conduct scheme in Western Australia to improve how organisations respond to allegations of child abuse and child-related misconduct by workers and volunteers. The Act aims to strengthen child safety by ensuring allegations are properly investigated, risks are managed, and systems are improved to prevent future harm. It reflects Western Australia's alignment with the National Principles for Child Safe Organisations and recommendations from the Royal Commission into Institutional Responses to Child Sexual Abuse.

The Act applies to designated "child safe organisations," including certain government, non-government, education, religious, care, health, and community service providers that exercise care, supervision or authority over children. These organisations must notify the WA Ombudsman of allegations, convictions, or findings of reportable conduct involving their workers or volunteers. "Reportable conduct" includes sexual offences, sexual misconduct, physical assault, significant emotional or psychological harm, neglect, and behaviour that causes harm to a child.

Organisations have clear statutory obligations under the Act. When an allegation arises, the head of the organisation must ensure it is investigated promptly, fairly and independently, take appropriate risk management steps to protect children, and provide updates and final investigation findings to the Ombudsman. The scheme focuses not only on individual accountability but also on whether organisational systems, policies and culture contributed to the risk. The WA Ombudsman oversees the scheme, monitors compliance, provides guidance, and may conduct own-motion investigations where necessary. The Act supports a culture of transparency, accountability and continuous improvement in child-related services. It does not replace mandatory reporting obligations under other legislation but operates alongside them to ensure allegations of child abuse within organisations are managed consistently and safely across Western Australia.

RELEVANT LEGISLATION

Western Australia

- Children and Community Services Act 2004 (WA)
- Children and Community Services Amendment Act 2015 (WA)
- Working with Children (Criminal Record Checking) Act 2004 (WA)
- Working with Children (Criminal Record Checking) Regulations 2005 (WA)
- Child Safe Organisations (Reportable Conduct) Act 2022 (WA)
- School Education Act 1999 (WA)
- School Education Regulations 2000 (WA)
- Equal Opportunity Act 1984 (WA)
- Health Services Act 2016 (WA)
- Information Act 2002 (WA)
- Young Offenders Act 1994 (WA)
- Criminal Code Act Compilation Act 1913 (WA)

Commonwealth (National)

- National Principles for Child Safe Organisations
- Child Safe Standards (aligned to the National Principles)
- Family Law Act 1975 (Cth)
- Privacy Act 1988 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Education Services for Overseas Students Act 2000 (Cth)
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Education and Care Services National Law
- Education and Care Services National Regulations
- Fair Work Act 2009 (Cth)
- Work Health and Safety Act 2011 (Cth)

The Working with Children (Criminal Record Checking) Act 2004 (WA)

The Act establishes Western Australia's Working with Children (WWC) Check scheme to help protect children from harm. The Act requires people who engage in certain types of child-related work to obtain a WWC Check and hold a valid WWC Card before commencing that work. Its purpose is to reduce the risk of children being exposed to individuals with relevant criminal histories.

The Act defines "child-related work" broadly and applies to both paid employees and volunteers in roles involving contact with children in areas such as education, childcare, health services, religious organisations, sport, transport, and community services. Certain exemptions apply, but in general, individuals must apply for a WWC Check through the Department of Communities, which conducts a national criminal history assessment and ongoing monitoring.

Applications are assessed to determine whether an applicant poses an unacceptable risk to children. Outcomes include a WWC Card being granted, an Interim Negative Notice, or a Negative Notice. Individuals issued with a Negative Notice are prohibited from engaging in child-related work, and penalties apply to both individuals and organisations that fail to comply with the Act's requirements.

The Act also places obligations on employers and organisations to verify WWC status, maintain compliance, and remove individuals from child-related work if a Negative Notice is issued. Ongoing monitoring ensures that new relevant criminal charges or convictions are assessed throughout the validity of the card. The scheme operates as a preventative safeguard and works alongside other child protection and mandatory reporting laws in Western Australia.

THE DIFFERENCE BETWEEN THE WORKING WITH CHILDREN CHECK AND POLICE CHECK

The Working with Children Check and the Australian National Character Check are two different checks.

The Working with Children Check is an ongoing assessment of a person's eligibility to work with children and involves a check of a person's criminal history and other disciplinary and police information.

A Nationally Coordinated Criminal History Check is a point-in-time check that discloses criminal history.

Organisation obligations according to the Working with Children (Criminal Record Checking) Act 2004 (WA)	Staff and volunteer obligations according to the Working with Children (Criminal Record Checking) Act 2004 (WA)
Prior to engaging an employee or volunteer in child-related work, organisations must check the status of the person's check. Organisations must ensure that employees and volunteers have updated their details to include the name of the organisation. When this has been done, the organisation will receive a confirmation letter. Workers must update their details of employment to include the organisation and the address of the organisation **within 21 days of commencing work** It is important that organisations keep accurate records of the WWCC process including • card numbers (or application receipt numbers) of all workers and volunteers • expiry dates and card types • all correspondence from the WWCC (WA)	Employees and volunteers must ensure they have the correct type of check (employee or volunteer) when engaging in child-related work. Employees and volunteers must ensure that their details are up to date. Changes to personal and employment details must be made **within 21 days**. Employees and volunteers must notify the WWCC office know if they have been charged or found guilty of any offences

NEW CRIMINAL OFFENCES

Grooming for Sexual Conduct

The offence of grooming for sexual conduct with a child under the age of 16 years is defined as: A person of or over the age of 18 years must not communicate, by words or conduct, with a child under the age of 16 years or a person under whose care, supervision or authority the child is (whether or not a response is made to the communication) with the intention of facilitating the child's engagement in or involvement in a sexual offence with that person or another person who is of or over the age of 18 years.

Failure to Protect Offence

The offence of failure to protect a child under the age of 16 years from sexual offence is defined as:

- a person who by reason of the position he or she occupies within a relevant organisation, has the power or responsibility to reduce or remove a substantial risk that a relevant child will become the victim of a sexual offence committed by a person of or over the age of 18 years who is associated with the organisation ; and knows that there is a substantial risk that that person will commit a sexual offence against a relevant child must not negligently fail to reduce or remove that risk.

The failure to protect offence applies to people within organisations who knew of a risk of child sexual abuse by someone in the organisation and had the authority to reduce or remove the risk but did not act to protect the child.

The offence applies where there is a substantial risk that a child under the age of 16 under the care, supervision or authority of a relevant organisation will become a victim of a sexual offence committed by an adult associated with that organisation. A person in a position of authority in the organisation will commit the offence if they know of the risk of abuse and have the power or responsibility to reduce or remove the risk but negligently fail to do so. This offence encourages organisations to actively manage the risks of sexual offences being committed against children in their care to protect them from harm.

Failure to Disclose Offence

The offence of failure to disclose a sexual offence committed against a child under the age of 16 years is defined as:

- a person of or over the age of 18 years (whether in Victoria or elsewhere), who has information that leads the person to form a reasonable belief that a sexual offence has been committed in Victoria against a child under the age of 16 years by another person of or over the age of 18 years, must disclose that information to a member of the police force of Victoria as soon as it is practicable to do so, unless the person has a reasonable excuse for not doing so. The failure to disclose offence helps to ensure that protecting children from sexual abuse is the responsibility of the whole community.

MANDATORY REPORTING

All mandatory reporters must make a report to the Police or relevant local Child Protection Services Authority as soon as practicable if, during the course of carrying out their professional roles and responsibilities, they form a belief on reasonable grounds that:

- a child has suffered, or is likely to suffer, significant harm as a result of physical injury or sexual abuse
- the child's parents have not protected, or are unlikely to protect, the child from harm of that type.

It's a criminal offence not to report in these circumstances. It's recommended that mandatory reporters follow the four critical actions.

Individuals who are required to report:

- registered teachers, including principals, and early childhood teachers
- school staff who have been granted permission to teach by the VIT
- registered medical practitioners, nurses and midwives
- police officers
- registered psychologists
- people in religious ministry
- early childhood workers
- youth justice workers
- out-of-home care workers (excluding voluntary foster and kinship carers)
- school counsellors including staff who provide direct support to students for mental, emotional, or psychological wellbeing, including (but not limited to) school health and wellbeing staff, primary welfare officers, student wellbeing coordinators, mental health practitioners, chaplains, and Student Support Services staff.

Reportable Conduct Scheme

The Reportable Conduct Scheme requires organisations involving children to notify the Commissioner for Children and Young People (CCYP) of any alleged abuse by people employed by:

- the organisation
- volunteers, as well as foster and kinship carers in a formal care arrangement.
- contractors
- office holders
- ministers of religion
- officers of a religious body

There are 5 types of 'reportable conduct':

- sexual offences (against, with or in the presence of, a child)
- sexual misconduct (against, with or in the presence of, a child)
- physical violence (against, with or in the presence of, a child)
- behaviour that causes significant emotional or psychological harm
- significant neglect.

Under the scheme, the CCYP has the power to:

- oversee and monitor the handling of allegations of child abuse by relevant government departments, religious and non-government organisations
- undertake independent investigations
- scrutinise and audit systems and processes for handling allegations
- monitor and report on trends
- build skills and knowledge within government departments, religious and non-government organisations to ensure they can competently handle allegations of suspected child abuse[1].

EQUITY AND DIVERSITY

The purpose of this policy is to ensure that AIIU developing and/or implementing AIIU programs, including Student Exchange Programs, comply with legal obligations to provide inclusive educational environments where students are treated with respect and dignity, regardless of their attributes.

AIIU recognises the diverse circumstances of children and young people and works to celebrate their strengths and individual characteristics and embrace them regardless of their abilities, gender, socio-economic status and cultural background.

Staff, volunteers, host families, affiliated organisations and all other relevant personnel are trained to recognise and respond effectively to children and young people with diverse needs, with a particular focus on vulnerable groups, including Aboriginal and Torres Strait Islander children, children with a disability, and children from culturally and linguistically diverse backgrounds and LGBTIQ+.

AIIU must take steps to create a learning environment where all students are welcomed, accepted and treated equitably and with respect regardless of their backgrounds or attributes such as race, religious belief or activity, gender identity, disability or sexual orientation so that they can participate, achieve and thrive at school.

AIIU:

- must not unlawfully discriminate when deciding who should be enrolled in a student exchange program and on what terms
- must not unlawfully discriminate against a student by denying or limiting access to any benefit provided by the AIIU or by subjecting a student to any other detriment because of the student's attribute
- must not unlawfully discriminate against a student by expelling them because of the student's attribute
- must make reasonable adjustments for students with disabilities who require adjustments to enable them to participate in their education and other school activities (for example, school sports, concerts and other events) on the same basis as their peers without a disability
- must take steps to provide an educational setting that is safe for all students, and which is free from bullying, unlawful discrimination, sexual harassment, disability harassment (such as hurtful or humiliating comments or actions about a person's disability) or victimisation
- must acknowledge and respond to the diverse needs, identities and strengths of all students
- must encourage empathy and fairness towards others
- must challenge stereotypes that promote prejudicial and biassed behaviours and practices
- must create a learning environment for all students that acknowledges, respects and values different cultures and identities including Koorie cultures
- must respond to complaints and allegations appropriately and ensure that racism within the organisation is identified, confronted and not tolerated, and that any instances of racism are addressed with appropriate consequences.

EQUAL OPPORTUNITY:
ANTI-DISCRIMINATION, RACIAL VILIFICATION AND DISABILITY DISCRIMINATION

An important purpose of this policy is to ensure that AIIU comply with legal obligations to provide inclusive educational environments where students are treated with respect and dignity, regardless of their attributes.

- AIIU are required to comply with a number of legislative obligations that relate to equal opportunity and human rights
- It is unlawful for AIIU to discriminate against students on the basis of certain protected attributes (for example, race, religious belief or activity, disability, sex, gender identity or sexual orientation) – refer to 'Definitions' below for a complete list of protected attributes

AIIU must comply with federal and state anti-discrimination laws and the Charter of Human Rights and Responsibilities.

Equal Opportunity Act Objectives

The objectives of this Act are:

(a) To eliminate discrimination, sexual harassment and victimisation, to the greatest possible extent;

(b) To further promote and protect the right to equality set out in the Charter of Human Rights and Responsibilities;

(c) To encourage the identification and elimination of systemic causes of discrimination, sexual harassment and victimisation;

(d) To promote and facilitate the progressive realisation of equality, as far as reasonably practicable by recognising that-

  (i) discrimination can cause social and economic disadvantage and that access to opportunity is not equitably distributed throughout society;

  (ii) equal application of a rule to different groups can have unequal results or outcomes;

  (iii) the achievement of substantive equality may require the making of reasonable adjustments and reasonable accommodation and the taking of special measures;

(e) to enable the Equal Opportunity and Human Rights Commission, or the local jurisdiction equivalent, to encourage best practice and facilitate compliance with this Act by undertaking research, educative and enforcement functions;

(f) to enable the Equal Opportunity and Human Rights Commission or the local jurisdiction equivalent, to resolve disputes about discrimination, sexual harassment and victimisation in a timely and effective manner, and to also provide direct access to the relevant Civil and Administrative Tribunal for resolution of such disputes.

Definitions

Discrimination is defined as being linked to the following attributes, the basis of which discrimination is prohibited in the set area of activity:

(a) age
(b) breastfeeding
(c) employment activity
(d) gender identity
(e) disability
(f) industrial activity
(g) lawful sexual activity
(h) marital status
(i) parental status or status career
(j) physical features
(k) political belief or activity
(l) pregnancy
(m) race
(n) religious belief or activity
(o) sex
(p) sexual orientation
(q) personal association (whether as a relative or otherwise) with a person who is identified by reference to any of the above attributes.

Equal Employment Opportunity

AIIU and Partner Organisations must choose the best person for the job regardless of:

- race, colour and national origin;
- physical, intellectual or psychological impairment including HIV and AIDS;
- gender;
- marital status (including de facto);
- parental status (including pregnancy);
- religious or political beliefs, activities or practices.

AIIU should establish and monitor all employment policies, practices and procedures to ensure that equal opportunity principles are followed in all areas of staff management.

CHILD SAFEGUARDING

AIIU believes that the safety of children is of paramount importance and aims to protect a child's right to be safe from abuse of any kind. AIIU will ensure that all parties affected by this policy are aware of their roles and responsibilities regarding child protection.

AIIU must therefore provide an environment that is free from any type of abuse and foster a child's growth and development as per the individual requirements of each child. The staff of AIIU should therefore be aware of their obligations and responsibilities regarding the safety of children.

AIIU will educate all parties about their roles in creating a child-safe environment, including identifying and responding to signs of child abuse.

AIIU requires all those involved in developing and implementing Student Exchange Programs to have strategies in place to:

- prevent child abuse;
- encourage reporting of any abuse that does occur;
- improve responses to any allegations of child abuse;
- review these processes regularly.

In addition, AIIU should provide regular training to their staff on child safety issues to ensure that, in the event, a child has suffered abuse, all relevant personnel can act quickly in the best interests of the child.

AIIU must focus on promoting the cultural safety of Aboriginal children, the cultural safety of children from culturally and linguistically diverse backgrounds and the safety of children with a disability.

Specifically, all relevant policies and procedures relating to child safety and wellbeing should describe AIIU's commitment to respecting and valuing Aboriginal children and young people. This includes that:

- staff, volunteers, host families and students must encourage and support children to express their culture and enjoy their cultural rights
- staff, volunteers, host families and students must actively support and facilitate participation and inclusion within the organisation by Aboriginal children and their families
- racism will not be tolerated within AIIU and across all of its programs and activities and how AIIU will respond, including potential consequences
- AIIU's leadership has a responsibility to help everyone involved with the organisation to acknowledge and appreciate the strengths of Aboriginal culture and understand its importance to the wellbeing and safety of Aboriginal children and young people.

The 4 R's of safeguarding children are a set of strategies for promoting the welfare and the safety of children. They stand for:

1. ***Recognise*** signs of abuse or potential risks to welfare.
2. ***Respond*** appropriately and promptly to any concerns about child safety.
3. ***Record*** all relevant information accurately and confidentially.
4. ***Refer*** to the appropriate services for further investigation or support.

These strategies are essential in ensuring that you are able to effectively identify risks, respond effectively and refer to where necessary. They help to ensure that vulnerable children and young people receive the protection and support they need.

FORMS OF ABUSE

All volunteers and employees must understand how child abuse can occur to create a child-safe environment.

A child is under the age of 18 years, whereas under Mandatory Reporting a child is under 17 years of age (qualified) and under the Crimes Act a child is under 16 years of age (qualified).

For the purposes of the Child Safe Standards, abuse constitutes any act committed against a child involving:

- Physical child abuse
- Child sexual abuse
- Grooming
- Emotional child abuse
- Neglect
- Family violence
- Children exhibiting inappropriate sexual behaviour This list is not exhaustive but may include:

Cumulative harm – Cumulative harm refers to the effects of multiple adverse or harmful circumstances and events in a child's life. Cumulative harm may be caused by an accumulation of a recurring negative circumstance (such as unrelenting low-level care) or even; or by multiple occasions or events (such as persistent verbal abuse and denigration, inconsistent or harsh disciplines or exposure to family violence.

Multidimensional harm – occurs when more than one abuse type is experienced at the same time, e.g. sexual abuse also involves physical Abuse and Emotional Abuse at the same time.

Emotional abuse – 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.

Serious emotional or psychological abuse could also result from conduct that exploits a child without necessarily being criminal, such as encouraging a child to engage in inappropriate or risky behaviours.

Exposure to Family Violence – Family violence is behaviour towards a family member that may include:

- physical violence or threats of violence
- verbal abuse, including threats
- emotional or psychological abuse
- sexual abuse
- financial and social abuse.

A child's exposure to family violence constitutes child abuse. This exposure can be very harmful and may result in physical harm and long-term physical, psychological and emotional trauma. Action must be taken to protect the child, and to mitigate or limit their trauma.

Grooming – Many perpetrators of sexual offences against children purposely create relationships with children and young people, their families and carers to create a situation where abuse could occur. Grooming concerns predatory conduct undertaken to prepare a child for sexual activity.

For example:

- Spending special time with a child, e.g. in private settings, away from the organisation, online;
- Isolating the children or young people from family and peers;
- Giving gifts to a child;
- Showing favouritism;
- Allowing the child to step out of boundaries or rules;
- Touching the child; and
- Testing and breaking professional boundaries

Neglect – Neglect is the continued failure to provide a child with the necessities of life, such as food, clothing, shelter, hygiene, medical attention or adequate supervision, to the extent that the child's health, safety, and development are, or is likely to be, jeopardised. Neglect also occurs if an adult fails to ensure a child's safety when exposed to dangerous or life-threatening situations.

Physical violence – Physical violence occurs when a child suffers or is likely to suffer significant harm from a non-accidental injury or injuries inflicted by another person. Physical violence can be imposed in many ways, including hitting, beating, shaking, burning, or using weapons (such as belts and paddles).

Sexual offences – occur when a person involves the child in sexual activity or deliberately puts the child in the presence of sexual behaviours that are exploitative or inappropriate to their age and development. Child sexual abuse can involve a range of sexual activities, including fondling, masturbation, penetration, voyeurism and exhibitionism. It can also include exposure to or exploitation through pornography or prostitution and grooming.

Sexually harmful behaviour in children – refers to harmful behaviour perpetrated by a child (17 years of age or younger) to another child. Harmful behaviours in children often indicate that they have experienced abuse or neglect. Where sexually harmful behaviour occurs, organisations have a duty of care to both children. In children under ten years of age, such behaviour is usually referred to as sexually problematic behaviour.

ROLES & RESPONSIBILITIES

KEY ROLE	KEY RESPONSIBILITIES
All Staff, Employees, Students, Volunteers, Host families, Contractors and other relevant personnel	• To be aware of, understand and apply the requirements of this policy in all areas of work. • Work with AIIU to embed and uphold the Child Safe Policy. • Attend Child Safe training. • Report any abuse/neglect concerns, allegations or disclosures to the child safe officer and/or relevant authorities. • Understand the legislation and legal obligations to report. • Obtain and maintain a valid Working with Children Check as required for their role. • Where a child is in immediate danger, call the Police. • Respond appropriately to a child who makes or is affected by an allegation of child abuse.
Local Child Safety Officer/AIIU Regional Manager	• Act as the first point of contact for child safety concerns or allegations of abuse within the AIIU. • Consult and liaise with the host school principal on the implementation of the Child Safe Standards. • Provide support to the child, the parents/carers, the person who reports and the accused person. • Initiate internal processes to ensure the safety of the child(ren). • Decide, considering legal requirements and duty of care, whether the matter will be reported to the Police or Child Protection and lodge a report as soon as possible (if required). • Confirm relevant authorities have been notified. • Monitor compliance with the child safe policy and reporting procedure and respond appropriately where non-compliance is identified. • Create, develop and support a culture of child safety within the host school. • Ensure all Staff, Employees, Students, Volunteers, Host families, Contractors and other relevant personnel are aware of how to respond appropriately to a child who makes or is affected by an allegation of child abuse. • Review and update the Child Safety Policy annually. • Inform the children and young people about this policy and make it publicly available. • Oversee the implementation of the Child Safe Policy and Reporting Procedure. • Store the Incident Reporting Form for reporting purposes according to privacy policy and procedures.

Leadership	• Demonstrate leadership in child safe practices. • Monitor compliance with the child safe policy and reporting procedure and respond appropriately where non-compliance is identified. • Ensure organisational systems and processes are in place relating to recruitment, training, appraisals and ongoing management of staff and the implementation of the Child Safe Standards. • Undertake or nominate an appropriate delegate where the local Child Safety Officer is unavailable. Where this occurs, it must be widely publicised to the school community. • Develop a culture of child safety within the school. • Confirm the nature of the complaint and commence disciplinary processes if needed. • Ensure child safe principles are included in risk assessments. • Conduct appropriate child safe recruitment practices and screening processes. • Ensure processes are in place to facilitate the appropriate response to a child who makes or is affected by an allegation of child abuse.
AIIU	• Continuously develop a culture of child safety within AIIU. • Provide information relating to Child Safety via training to new and existing staff, volunteers, affiliated organisations and host families. • Make child safety resources/templates available to Regional Managers. • Provide support and assistance to Regional Managers. • Inform Regional Managers of any changes to legislation • Research and share information and updates regarding Child Safe Standards and legislative changes to all relevant personnel. • Develop and distribute child safe materials such as posters and leaflets. • Must immediately report any incident or allegation involving actual or alleged sexual or physical abuse of an exchange student to: - the relevant law enforcement agency if they are an inbound student - the relevant authority in the host country if they are an outbound student. • If AIIU has reasonable grounds to believe that one of its students (aged under 16 years) is in need of protection, it must make a report.. • Must also advise the TIWA about the incident or allegation and what steps the SEO has taken in response. • Determine if an allegation is a Reportable Conduct offence and oversee any investigations into suspected staff and volunteer misconduct and provide advice in relation to disciplinary procedures as they apply to the Child Safe Standards and Child Safe Policy.

GENERAL RESPONSIBILITIES OF AIIU

The below information is a general guide and specific responsibilities should be detailed in the AIIU Code of Conduct.

AIIU must:

- Ensure that all staff:
    - are clear about their roles and responsibilities regarding child protection and child safeguarding.
    - are required to observe Child Safe Standards and expectations for appropriate behaviour towards and in the company of children.
    - always adhere to AIIU Child Safe Policy and Code of Conduct and uphold AIIU's Statement of Commitment to child safety.
    - take all reasonable steps to protect children from abuse.
    - are aware of their obligations to immediately report suspected abuse
    - are aware of the indicators when a child may be at risk of harm or significant harm.
- Provide/facilitate training and development for all staff in the recognition and reporting of abuse and harm.
- Provide reporting procedures and professional standards for care and protection work.
- Ensure that all allegations of child abuse are reported to the AIIU's mandatory reporter, local Child Safety Officer and School Principal/Organisation leader, who will ensure any allegation is reported to the police or Child Protection Services, General Manager, AIIU and AIIU Regional Managers.
- If an allegation of child abuse is made, ensure as quickly as possible that the child(ren) is safe.
- Ensure all staff have access to relevant acts, regulations, standards, and other resources for them to fulfil their obligations.
- Treat everyone with respect.
- Promote the cultural safety, participation, and empowerment of Aboriginal children (for example, by never questioning an Aboriginal child's self-identification).
- Promote the cultural safety, participation, and empowerment of children from culturally and/or linguistically diverse backgrounds (for example, by having a zero-tolerance approach to discrimination).
- Promote the safety, participation, and empowerment of children with a disability (for example, by having a zero tolerance of discrimination).
- Encourage children to have a say and participate in all relevant AIIU activities where possible, especially on issues that are important to them.
- Ensure as far as practicable that adults are not left alone with a child.

RESPONSIBILITIES OF MANDATORY REPORTERS

Mandatory Reporters must:

- make a report to Child Protection if they form a belief on reasonable grounds that a child needs protection from physical injury or sexual abuse;
- make a report as soon as practicable after forming a belief;
- make a report on each occasion they form a belief;
- make a report even if leaders do not share their belief; and
- ensure that a report has been made when another mandated reporter has undertaken to make the report.

CODE OF CONDUCT

AIIU recognises a Code of Conduct as an essential strategy to help keep children safe from harm. A Code of Conduct lists acceptable behaviours and those that are unacceptable. It identifies professional boundaries, ethical behaviour and how to avoid or better manage difficult situations.

The Child Safety Code of Conduct is one of the requirements of the Child Safe Standards.

It applies to all those adults involved in child-related work with students.

This Child Safety Code of Conduct identifies inappropriate behaviour with children in a school environment. The objective is to guide school staff in identifying and regulating their behaviour and the behaviour of other school staff and to protect children from abuse in the school environment.

RECRUITMENT PROCESS FOR STAFF

Recruitment Process

AIIU will follow the procedures below when recruiting staff:

1. Clarify the need for and role of the staff member and develop or review the Job Description:
    - Ensure that position descriptions for all new positions advertised include a reference to **Child Safe Environments**.
2. Identify roles to be involved in the shortlisting and interviewing.
3. Advertise the position.
4. Send applicants a copy of the position description. The Code of Conduct and position descriptions must outline expectations of staff and volunteer behaviour including:
    - zero tolerance of racism and expectations that staff and volunteers will act on incidents of racism
    - that children will be supported to express their culture and enjoy their cultural rights.
5. Shortlist applicants based on their skills and experience.
6. Conduct interviews and include child safeguarding questions.
7. Select the most suitable applicant. In accordance with any applicable legal requirement or policy, AIIU and/or its schools, affiliated organisations etc. must make reasonable efforts to gather, verify and record the following information about a person whom it proposes to engage to perform child-connected work:
    - Working with Children Check status, or similar check;
    - Proof of personal identity and any professional or other qualifications;
    - The person's history of work involving children; and
    - 2-3 references re: person's suitability for working with children.

8. Conduct 2-3 verbal professional reference checks for the applicant. Follow up with referee reports as they are a critical part of the assessment of the relative merits of each short-listed applicant.
9. Advise the successful applicant in writing including the probation period.
10. Sign a **Child Safety Commitment.**
11. Write letters to unsuccessful applicants.
12. Orientate the new staff member. New staff must have 3 hours mandatory child safety training.
13. All staff and volunteers receive an appropriate induction and are aware of their responsibilities to children and young people, including record-keeping, information sharing and reporting obligations.
14. Ongoing supervision and people management is focused on child safety and wellbeing.

Staff must be selected against the key selection criteria outlined in the relevant position description. AIIU should carry out verbal reference checks before a new employee is engaged.

Advertising Positions

Position descriptions must include a reference to Child Safe Environments.

Interviewing

The selection panel should draw up a list of interview questions prior to the interviews. All applicants should be asked the same questions. The questions should aim to explore the applicants' relevant skills and experience to perform the duties and include a range of behavioural and values-based questions that will help determine the person's suitability for the position and uncover any potential risks to children.

Each interview should include questions that explore the:

- Motivation to work with children
- Understanding of child abuse in organisational settings, e.g. how it occurs, prevention strategies.
- Work history, including prior positions held, responsibilities, any gaps, and reasons for leaving (especially where previous roles involved work with children).

Particular attention is paid to:

- Answers that indicate a lack of professional boundaries in relation to working with children.
- Answers that are incomplete or concerning.
- Any unusual context for the candidate to be seeking employment with children.

Procedures When a New Staff Member is Recruited

When a new employee is appointed, the following must apply:

- the employee has a copy of their job description which includes the following statement:

AIIU and all of its affiliated AIIU are child safe environments. Our activities promote the safety and wellbeing of all students, staff, volunteers and other relevant personnel. We are committed to protecting students from abuse or harm in accordance with our legal obligations including the Child Safe Standards.

- all staff, volunteers and committee members must undertake three hours of compulsory Child Safety training
- all staff, volunteers and other relevant personnel must sign a Code of Conduct annually to ensure they have read and understood its contents

NB: All job descriptions and Agreements of Employment should incorporate child safe messaging.

DIGITAL TECHNOLOGY

This following outlines measures AIIU must take to support all students, including exchange students, to engage with digital technology in a safe and responsible way.

- There is a duty of care to students to take reasonable steps to ensure digital learning is conducted in a safe and responsible manner.
- Ensure students are aware of expectations relating to the safe, responsible and ethical use of digital technologies.
- Online safety should be included in all program planning.
- Online incidents of concern must be managed in accordance with AIIU's policy on Managing and Reporting Critical Incidents, as well as any other policy relevant to the type of incident.

There is a duty of care to take reasonable steps to protect students from any harm that should have reasonably been foreseen, including those that may be encountered within the online learning environment.

It is essential that the following are developed:

- clear processes and practices to manage online behaviour and respond to any incidents that may arise
- prepare program plans that explicitly teach safe, responsible and ethical online behaviours
- ensure students are aware of behavioural expectations when engaging in digital learning activities.
- recommend that parents/carers and/or host families discuss, develop and implement a similar 'family agreement' at home. This will assist students to understand what is and isn't appropriate behaviour and that appropriate behaviour is expected everywhere and anytime they are online.

Supervision When Using Digital Technology in the Classroom

AIIU should have measures in place to ensure students are appropriately supervised when engaged in online learning.

Such measures might include:

- regularly monitoring screens
- installing remote access software that enables access to individual students' 1 to 1 learning device used in class
- actively reinforcing learning and behavioural expectations during the activity.

Posting Photographs Online

When including photographs of students in online platforms and applications, it is important to consider risk and consent.

Responding to Online Incidents

Any online incident must be responded to in accordance with the AIIU policy on Managing and Reporting Critical Incidents.

Key Definitions

Cyber Safety: refers to safe and desirable practices in online environments and the use of electronic and ICT equipment devices.

ICT Equipment/Devices: in this document includes, but is not limited to, computers, laptops, tablets, storage devices, cameras, all types of mobile phones, video and audio players/receivers, social networking sites, and any other technologies as they come into use.

Cyber Bullying: involves the unwanted use of electronic equipment devices to harass and cause discomfort to other members of the School community.

Behaving Safely Online Means:

- protecting their own privacy and personal information
- selecting appropriate spaces to work and contribute
- protecting the privacy of others (this can be sharing personal information or images)
- being proactive in letting the relevant personnel know if something is 'not quite right' These principles of safety and responsibility apply to internet and social media use at home and School.

AIIU'S RESPONSIBILITIES

- To provide everyone involved in AIIU's programs with an awareness of the benefits and risks of using ICT
- To integrate cyber safety education into all programs with other child safety measures
- To promote staff awareness of the professional responsibilities for students' safety in the area of cyber safety
- To provide professional learning in regarding cyber safety issues
- To provide information through avenues such as newsletters, website, and/or posters
- To liaise with outside agencies to offer education programs Cyber Safety Policy
- Promote safe and responsible use of ICT devices
- Investigate and act upon all cases of misuse of ICT equipment and devices.

STUDENTS' RESPONSIBILITIES

- To abide by AIIU/school's cyber safety policy, that aims to prevent bullying and harassment and ensure all material being accessed on the internet is appropriate
- To seek clarification about accessing websites or other sources of information where they may be unsure of content
- To ensure that student communications with other students, staff members and members of the outside community do not harass, vilify or attack personally other individuals. This includes, but is not limited to, written words and the posting of images
- Where ICT equipment devices are used out of School time, report any communications which are inappropriate to the relevant personnel i.e. teacher.

PARENTS/GUARDIAN/HOST FAMILY'S' RESPONSIBILITIES

- To encourage responsible communication using ICT equipment/devices.
- To explain the internet use permission form to their child/children/student.

REPORTABLE CONDUCT SCHEME

The Reportable Conduct Scheme seeks to improve organisations' response to their worker's and volunteers' allegations of child abuse and child-related misconduct. The WA Ombudsman is responsible for administering the scheme.

Summary

Leadership must notify the WA Ombudsman as soon as possible after becoming aware of a reportable conduct allegation involving any adults. AIIU will assess the allegations and report them to the WA Ombudsman, if appropriate.

The Reportable Conduct Scheme does not change or replace other reporting obligations such as mandatory reporting.

Details

The Reportable Conduct Scheme is a child safety mechanism. The Reportable Conduct Scheme complements the Child Safe Standards and other existing child safety measures.

AIIU policy is that it's leadership team has the responsibility for reporting any allegations of 'reportable conduct' raised against any adults who are 18 years or over to the WA Ombudsman.

There is an allegation of reportable conduct where a person has a reasonable belief that there has been:

- a sexual offence, sexual misconduct or physical violence committed against, with or in the presence of a child
- behaviour causing significant emotional or psychological harm to a child
- significant neglect of a child, or misconduct involving any of the above

Leaders should notify the WA Ombudsman as soon as possible after becoming aware of a reportable allegation.

The Reportable Conduct Scheme has been designed to ensure that the WA Ombudsman can oversee and monitor the handling of allegations of child abuse and share information with relevant bodies (e.g. Commissioner for Children and Young People, Working with Children Check Unit, relevant regulators and the Police) to better prevent and protect children from misuse.

There are five types of Reportable Conduct:

- **sexual offences** committed against, with or in the presence of a child
- **sexual misconduct** committed against, with or in the fact of a child
- **physical violence** against, with or in the presence of a child
- any behaviour that causes **significant emotional or psychological harm** to a child
- **significant neglect** of a child.

REQUIREMENTS OF HEADS OF ORGANISATIONS

The Reportable Conduct Scheme imposes new obligations on heads of organisations (General Manager, AIIU) within the scheme.

This includes requirements to:

- have in place systems to prevent child abuse and, if child abuse is alleged, to ensure allegations can be brought to the attention of appropriate persons for investigation and response
- ensure that the WA Ombudsman is notified and given updates on the organisation's response to an allegation
- report allegations that may involve criminal conduct to the police.

The Reportable Conduct Scheme does not replace the need to report allegations of child abuse, including criminal conduct and family violence, to the Police.

A snapshot of a head of organisation's obligations under reportable conduct:

WHERE TO GET HELP

The Western Australia Reportable Conduct Scheme, which requires organisations to report allegations of child abuse by employees, is administered by the Ombudsman WA.

Contact them at (08) 9220 7471, email reportableconduct@ombudsman.wa.gov.au,
or visit the Ombudsman WA Reportable Conduct Scheme website for advice, resources, and reporting forms.

INDICATORS OF CHILD ABUSE

Abuse Type	Indicators
Physical	Physical indicators of physical child abuse include (but are not limited to): ● evidence of physical injury that would not likely be the result of an accident ● bruises or welts on facial areas and other areas of the body, such as back, bottom, legs, arms and inner thighs ● burns from boiling water, oil or flames or burns that show the shape of the object used to make them, such as from an iron, grill, or cigarette ● fractures of the skull, jaw, nose and limbs, especially those not consistent with the explanation offered, or the type of injury possible at the child's age of development ● cuts and grazes to the mouth, lips, gums, eye area, ears and external genitalia ● bald patches where hair has been pulled out ● multiple injuries - old and new ● effects of poisoning ● internal injuries.

Child sexual abuse	Physical Indicators of sexual abuse may include (but are not limited to): • injury to the genital or rectal area (for example: bruising, bleeding, discharge, inflammation or infection) • injury to areas of the body, such as breasts, buttocks, or upper thighs • discomfort in urinating or defecating • presence of foreign bodies in the vagina or rectum • sexually transmitted infections • frequent urinary tract infections. • disclosure of sexual abuse - by the child, friend, family member • drawings or descriptions of stories that are sexually explicit and not age-appropriate • persistent and age-inappropriate sexual activity, such as excessive masturbation or rubbing genitals against adults • wariness or fear of a parent, carer or guardian and reluctance to go home • unusual fear of physical contact with adults • change in sleeping patterns, fear of the dark or nightmares and regressive behaviour, such as bed-wetting • wearing clothes unsuitable for weather conditions to hide injuries • unusually nervous, hyperactive, aggressive, disruptive and destructive to self or others • exhibits significant delays in gross and fine motor development and coordination • overly compliant, shy, withdrawn, passive and uncommunicative • fear of home, specific places or particular adults • poor self-care or personal hygiene • complaining of headaches, stomach pains or nausea without physiological basis.

Grooming	Behavioural indicators that a child may be subject to grooming include (but are not limited to): ● developing an unusually close connection with an older person ● displaying mood changes, such as hyperactive, secretive, hostile, aggressive, impatient, resentful, anxious, withdrawn, or depressed ● using street or different language, such as copying the way the new 'friend' may speak, talking about the new 'friend' who does not belong to his or her normal social circle ● possessing gifts, money and expensive items given by the 'friend' ● being excessively secretive about their use of communications technologies, including social media ● being dishonest about where they've been and whom they've been with.
Emotional child abuse	Physical indicators of emotional abuse include (but are not limited to): ● language delay, stuttering or selectively being mute (this is when the child only speaks with certain people or in certain situations) ● delays in emotional, mental or physical development. Behavioural indicators of emotional abuse include (but are not limited to): ● overly compliant, passive and undemanding behaviour ● extremely demanding, aggressive and attention-seeking behaviour or anti-social and destructive behaviour ● low tolerance or frustration ● poor self-image and low self-esteem ● unexplained mood swings, depression, self-harm ● behaviours that are not age-appropriate (for example: overly adult or overly infantile) ● exhibits significant delays in gross and fine motor development and coordination ● poor social and interpersonal skills ● violent drawings or writing ● lack of positive social contact with other children.

Neglect	Physical indicators of neglect include (but are not limited to): ● appearing consistently dirty and unwashed ● being consistently inappropriately dressed for weather conditions ● being at risk of injury or harm due to consistent lack of adequate supervision from parents ● being consistently hungry, tired and listless ● unattended health problems/lack of routine medical care ● having inadequate shelter and unsafe or unsanitary conditions. Behaviour indicators of neglect include (but are not limited to): ● being left with older children or persons who could not reasonably be expected to provide adequate care and protection ● gorging when food is available or inability to eat when extremely hungry ● begging for, or stealing food ● appearing withdrawn, listless, pale and weak

	• aggressive behaviour, irritability • little positive interaction with parent, carer or guardian • indiscriminate acts of affection and excessive friendliness towards strangers • exhibits significant delays in gross and fine motor development and coordination • poor, irregular or non-attendance at the service (where regular attendance is expected) • refusal or reluctance to go home • self-destructive behaviour • taking on an adult role of caring for parent.

Family Violence	Physical indicators of family violence may include (but are not limited to): • speech disorders • delays in physical development • failure to thrive (without an organic cause) • bruises, cuts or welts on facial areas, and other parts of the body including back, bottom, legs, arms and inner thighs • any bruises or welts (old or new) in unusual configurations, or those that look like the object used to make the injury (such as fingerprints, handprints, buckles, iron or teeth) • internal injuries. Behavioural indicators of family violence may include (but are not limited to): • violent or aggressive behaviour and language • depression and anxiety • appearing nervous and withdrawn, including wariness of adults • difficulty adjusting to change • developmentally inappropriate bedwetting and sleeping disorders • extremely demanding, attention-seeking behaviour • participating in dangerous risk-taking behaviours to impress peers. • overly compliant, shy, withdrawn, passive and uncommunicative • 'acting out', such as cruelty to animals. • demonstrated fear of parents, carers or guardians, and of going home • complaining of headaches, stomach pains or nausea without physiological basis.

REVIEWING THE CHILD SAFETY POLICY

AIIU will record, review and analyse complaints, issues, concerns and safety incidents for the purpose of identifying causes and systemic failures, and to inform continuous improvement. AIIU's **Evaluation Framework: Policies, Guidelines and Programs** outlines the process by which it will do this.

In accordance with the processes outlined in its **Engagement Overview**, AIIU will report on and share findings and actions taken in response to relevant reviews of its policies, guidelines and programs, including those related to child safety incidents, with students, families/guardians, staff and volunteers.

All policies and procedures related to child safe practices, including this Child Safety Policy, are **annually reviewed** or following a significant incident. The General Manager, AIIU has overall responsibility to ensure that these reviews form part of core business for the organisation and to delegate the facilitation of these reviews to the Regional Managers. Once a policy or procedure has been reviewed, and if needed, updated, the General Manager is the designated 'Approver'.

Changes to policies and procedures are made based on review findings to better protect the children and young people we engage with.

Furthermore, as part of AIIU's commitment to a culture of continuous improvement, child safe practices is a standing item on the agenda of all scheduled leadership and staff meetings.

Where possible, AIIU does its best to seek feedback from all stakeholders in its review of policies and procedures, including students, host families, host schools, parents/carers, third-party affiliated organisations, and where appropriate local Aboriginal communities, culturally and linguistically diverse communities and people with a disability.

Child Safety Policy Declaration

I have read this Child Safety Policy and understand the fundamental principles, values and behaviours at the heart of working with community language schools. I agree to always abide by the Child Safety Policy.

Name: _____ Signature: _____

Role: _____ Date: _____

This policy will be reviewed:

- Annually
- After any incident as related to the safety of a child
- As part of continuous improvement

Policy last reviewed	February 2026
Approved by	General Manager
Consultation/Noting	AIIU Management Team
Next scheduled review date	February 2027