

# anzuk National Child Safety Policy

Drafted by	Moores	Approved by the Executive Leadership Team	June 2024
Responsible person	CEO	Scheduled review date	Annually

## Child Safety Policy

### 1 Introduction

- 1.1 anzuk Education (anzuk) is committed to promoting and protecting the health, safety and wellbeing of all children and young people.
- 1.2 anzuk has no tolerance for child abuse or risk of harm.
- 1.3 If any person believes a child is at immediate risk of abuse or harm, telephone 000.
- 1.4 This Child Safety Policy (Policy) takes into account the diversity of all children, including the needs of Aboriginal and Torres Strait Islander children, children from culturally and/or linguistically diverse backgrounds, LGBTIQA+ children, children with disabilities, children who are unable to live at home, and children who are vulnerable.
- 1.5 anzuk is a recruitment organisation that also assigns labour hire casual employees in education settings. We are committed to ensuring that all Workers and partner Education Institutions are aware of the importance of child safety and understand the obligations relevant to their respective roles when working with children and young people.

### 2 Commitment to the safety of children and young people

- 2.1 anzuk is committed to providing children and young people with a safe, and inclusive environment in which they can thrive.
- 2.2 anzuk supports, values and respects all children and young people, and is committed to their safety, wellbeing, participation and empowerment.

- 2.3 anzuk has no tolerance for all forms of abuse or harm to children and young people. All allegations, suspicions, concerns and reports of child abuse or risk of harm will be treated seriously in accordance with this Policy and the Child Safety Procedure.
- 2.4 anzuk is committed to the cultural safety of Aboriginal children and young people and those from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children living with a disability, children who cannot live at home, LGBTIQA+ children and children who are vulnerable.
- 2.5 The safety, welfare and best interests of the child are paramount.

### **3 Purpose**

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- 3.1 This Policy, together with the Child Safety Procedure, aims to:
  - (a) ensure anzuk meets its responsibilities for the safety, protection and wellbeing of children and young people;
  - (b) create and foster an organisational culture where Child Safety is the highest priority;
  - (c) provide Workers with guidance on their responsibilities to identify, prevent and report child abuse or risk of harm to children, and what they should do if they suspect it, including in Educational Environments;
  - (d) establish controls for preventing child abuse or risk of harm and detecting it when it occurs within Educational Environments;
  - (e) provide a clear statement to Workers that child abuse or risk of harm is prohibited and will not be tolerated;
  - (f) provide assurance that allegations, concerns, suspicions and reports of child abuse or risk of harm will be addressed, which may involve reports to external regulators and an investigation, in accordance with the Child Safety Procedure. anzuk will cooperate with any investigations into reports of child abuse or risk of harm to children or young people conducted by an Educational Institution, police, government department or regulator.

### **4 Scope**

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This Policy applies to all Workers engaged by anzuk, including anzuk Casual Employees/Educators, in conjunction with anzuk's Child Safety Code of Conduct and the Child Safety Procedure. anzuk Workers may also be required to comply with the child safety policies, procedures and child safety code of conduct issued by the Educational Institution in which they are placed on assignment.

This Policy applies in all Educational Environments and all interactions with children and young people including:

- (a) physical contact,
- (b) face to face contact;
- (c) contact by post or other written communication;
- (d) contact by telephone or other oral communication; and
- (e) online contact including by email, social media or other electronic means.

4.2 The definitions in this Policy will apply to this Policy to the extent of any inconsistency with the definitions of the Child Safety Procedure, unless stated otherwise.

## 5 Definitions

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**anzuk** means anzuk Education Services Pty Ltd (ACN 123 730 521).

**anzuk Casual Employees/ Educators** means anzuk's Labour Hire casual employees who are placed on assignment in Educational Institutions, for example as casual relief teachers and teaching assistants.

**anzuk Internal Team Members** means anzuk Workers who are not anzuk Casual Employees/Educators.

**Child, children or young person** means a child or young person who is under 18 years of age, unless otherwise defined by law or noted in this Policy or Child Safety Procedure.

**Child abuse or risk of harm** means conduct and/or the risk of conduct towards, against, with or in the presence of a child, including:

- (a) physical violence or harm;
- (b) conduct of a sexual nature, including a sexual offence, sexual abuse, sexual misconduct and/or grooming a child;
- (c) significant emotional or psychological harm; or
- (d) significant neglect of a child.

**Child-related work** means work which usually involves (or is likely to involve) direct contact with a child, irrespective of whether that contact is supervised or not, and in child-related occupational fields including (but not limited to) education and care services, educational institutions, counselling, or other support services for children.

**Child Safety** means matters related to anzuk's duty of care to children in the care of anzuk Casual Employees/Educators whilst placed on assignment at Educational Institutions, protecting all children from harm, promoting the safety and wellbeing of children, managing child abuse or risk of harm, taking steps to prevent the occurrence or reduce the occurrence of child abuse or risk of harm, providing support to a child at risk of child abuse, and responding to incidents or allegations of child abuse or risk of harm.

**Child Safety Officers or CSOs** means people appointed by anzuk to listen, discuss and clarify issues raised by Workers and/or Educational Institutions in relation to actual or suspected child abuse or risk of harm at Educational Institutions.

**Educational Environment** means all physical and online environments and places made available or authorised for use by a child by the Educational Institutions in which anzuk Casual Employees/Educators are placed on assignment, including but not limited to:

- (a) the physical premises of the Educational Institutions;
- (b) the online Educational Environments (including email, portals, intranet systems, telecommunication, social media and other online communications); and
- (c) other locations provided by Educational Institutions for a Learner's use (including, without limitation, locations used for camps, excursions, "rest days", competitions, and other events).

**Educational Institutions** means the schools, early learning centres, kindergartens and other educational entities that provide education services in which anzuk Casual Employees/Educators are placed on assignment.

**Executive Leadership Team** means the CEO, Head of People and Growth, National Head of Executive, National Head of Early Childhood, National Head of Temp Schools, the Chief Financial Officer and the Chief Information Officer.

**Grooming** means an adult communicates, by words or conduct, with a child under the age of 16 years or with a person who has care, supervision or authority for the child with the intention of facilitating the child's involvement in sexual conduct, either with the groomer or another adult, unless otherwise defined by law or noted in this Policy or the Child Safety Procedure.

**Learner** means a student in the Educational Institution in which an anzuk Casual Employee/Educator is placed, and includes:

- (a) a child; and
- (b) a student who is 18 years of age or older.

**LGBTIQA+** is an evolving acronym that stands for lesbian, gay, bisexual, transgender, intersex, queer/questioning, asexual.

**Sexual misconduct** includes behaviour, physical contact or speech or other communication of a sexual nature, inappropriate touching, grooming behaviour and voyeurism, unless otherwise defined by law or the Child Safety Procedure.

**Sexual offence** means a sexual offence committed against, with or in the presence of a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded, unless otherwise defined by law or the Child Safety Procedure.

**Teacher Registration** means registration as a teacher with the relevant teacher registration regulator in each relevant State and Territory:

- (a) In Victoria, the Victorian Institute of Teaching;
- (b) In New South Wales, the New South Wales Education Standards Authority;
- (c) In the Australian Capital Territory, the Teacher Quality Institute;
- (d) In Queensland, the Queensland College of Teachers; and
- (e) In Western Australia, the Teacher Registration Board Western Australia.

**Workers** means anzuk employees (including anzuk Casual Employees/ Educators), directors, contractors and volunteers

**WWCC** means the relevant clearance for a person to work with children in each relevant State and Territory as follows:

- (f) In Victoria, a Working with Children Check issued pursuant to the *Worker Screening Act 2020* (Vic);
- (g) In New South Wales, a Working with Children Check issued pursuant to the *Child Protection (Working with Children) Act 2012* (NSW);
- (h) In the Australian Capital Territory, a Working with Vulnerable People registration issued under the *Working with Vulnerable People (Background Checking) Act 2011* (ACT);
- (i) In Queensland, a Blue Card issued under the *Working with Children (Risk Management and Screening) Act 2000* (Qld); and
- (j) In Western Australia, a Working with Children Check issued under the *Working with Children (Screening) Act 2004* (WA).

## 6 Guiding principles

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6.1 This Policy is based on the following principles:

- (a) anzuk has no tolerance for child abuse or risk of harm towards children.
- (b) All forms of child abuse cause harm to children.
- (c) The best interests, safety and wellbeing of the child are paramount.
- (d) Child safety and wellbeing is a shared responsibility of adults in the community.
- (e) All children have a right to feel and be safe and have equal rights to protection from abuse and neglect.
- (f) Care is needed to take account of the diversity of all children, including the needs of Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disabilities, children who cannot live at home, LGBTIQ+ children and children who are vulnerable, and make reasonable efforts to accommodate them.
- (g) Child safety involves promoting and protecting the cultural safety of Aboriginal children, and those from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children living with a disability, children who cannot live at home, and LGBTIQ+ children.

## 7 Recognising child abuse or risk of harm

- 7.1 Indicators of child abuse or risk of harm can be behavioural or physical and can co-occur with multiple types of child abuse or risk of harm. Examples include, but are not limited to:

<b>Physical violence or harm</b>
<ul style="list-style-type: none"> <li>• unexplained bruises, burns, welts, cuts grazes or scratches (or vague or unlikely explanations) for the child or their family members;</li> <li>• avoidance of physical contact, or disproportionate reactions or limited emotion displayed;</li> <li>• unexplained absences and decline in academic performance;</li> <li>• wearing clothing that is unsuitable for the weather conditions (to hide injuries);</li> <li>• substance abuse, self-harm or suicide attempts.</li> </ul>
<b>Conduct of a sexual nature, including a sexual offence, sexual abuse, sexual misconduct and/or grooming a child</b>
<ul style="list-style-type: none"> <li>• signs of pain, itching or discomfort in the genital or rectal area;</li> <li>• sexualised behaviours;</li> <li>• withdrawal, low self-esteem, suicidal ideation, self-harm;</li> <li>• manifestation of psychological diagnoses including anxiety, depression and substance misuse;</li> <li>• presence of sexually transmitted diseases;</li> <li>• frequent urinary tract infections;</li> <li>• pregnancy (actual or suspected);</li> <li>• self-mutilation;</li> <li>• displaying age-inappropriate sexual behaviour or knowledge;</li> <li>• inappropriate expressions of affection;</li> <li>• sudden fears of specific places or particular adults;</li> <li>• obsessive and compulsive washing;</li> <li>• complaining of headaches, stomach pains or nausea;</li> <li>• sleeping difficulties;</li> <li>• poor self-care or personal hygiene;</li> <li>• regressive behaviours such as bedwetting and speech loss;</li> <li>• substance abuse, self-harm or suicide attempts.</li> </ul>
<b>Emotional or psychological harm</b>
<ul style="list-style-type: none"> <li>• delays in emotional, mental or physical development;</li> <li>• speech impairments such as stuttering or being selectively mute;</li> <li>• rocking, thumb-sucking or other infantile behaviours;</li> <li>• eating disorders;</li> <li>• exhibiting high anxiety or symptoms of stress;</li> <li>• poor self-image or low self-esteem;</li> <li>• displaying aggressive, demanding or attention-seeking behaviour;</li> <li>• compulsive lying or stealing;</li> <li>• unexplained mood swings or depression;</li> <li>• poor social and interpersonal skills;</li> </ul>

- excessive neatness or cleanliness;
- substance abuse, self-harm or suicide attempt.

#### **Neglect of a child**

- frequent hunger, or stealing or begging for food;
- poor hygiene;
- lack adequate or suitable clothing;
- refusal or reluctance to go home;
- appearing dirty and unwashed;
- unattended health problems;
- appearing pale and weak;
- inadequate shelter or unsanitary living conditions;
- aggressive or self-destructive behaviour;
- involvement in criminal activity;
- poor, irregular or non-attendance at school;
- limited positive interaction with parents, carers or guardians;
- poor academic performance; and
- substance abuse.

## **8 Responsibilities**

8.1 The safety of children is everyone's responsibility.

### **All Workers**

8.2 All Workers:

- have a shared responsibility for contributing to the safety of children from child abuse or risk of harm;
- are responsible for identifying child abuse or risk of harm and taking steps to prevent and eliminate or mitigate the risk of child abuse or harm;
- must promote child safety at all times and provide a safe environment for all children; and
- must telephone 000 if they believe that there is a serious and immediate risk of child abuse or harm.

8.3 All Workers are required to:

- read and comply with this Policy, the Child Safety Code of Conduct and the Child Safety Procedure;
- take all reasonable steps to maintain an environment that is safe and prevents child abuse or risk of harm;
- respond to a child disclosing an incident of child abuse or risk of harm, in a sensitive and supportive manner that prioritises the child's health-wellbeing and safety;
- participate in child safety induction and training as directed by anzuk and request further assistance if further training is required;

- (e) report any allegations, concerns, suspicions and reports of actual or suspected child abuse or risk of harm as soon as possible in accordance with the anzuk' Child Safety Policy, the Child Safety Procedure, and the Procedures of any client with whom they are placed;
- (f) report any breach or suspected breach of this Policy, the Child Safety Code of Conduct and the Child Safety Procedure as soon as possible to a CSO.

### **Executive Leadership Team**

- 8.4 The Executive Leadership Team of anzuk will strive to comply with the National Child Safe Principles and Victorian and NSW Child Safe Standards, including:
- (a) preventing and detecting child abuse or risk of harm;
  - (b) ensuring anzuk has appropriate systems in place to effectively identify and prevent child abuse or risk of harm;
  - (c) ensuring anzuk has appropriate and effective internal control systems and processes in place to respond to child abuse or risk of harm;
  - (d) modelling and championing a child safe culture and making a public commitment to child safety; and
  - (e) ensuring anzuk equips Workers with appropriate training and information to identify, prevent and respond to child abuse or risk of harm, consistent with their obligations.
- 8.5 The Executive Leadership team:
- (a) will ensure CSOs are appointed and provided with training or information to perform their role effectively; and
  - (b) will oversee the response and investigation of reports of child abuse or risk of harm to children or young people, where appropriate.

### **The CEO**

- 8.6 The CEO of anzuk is responsible for:
- (a) promoting and modelling child safety at all times; and
  - (b) cooperating with any investigations into reports of child abuse or risk of harm to children or young people conducted by an Educational Institution, police, government department or regulator.



## **Team Leaders and Managers**

8.7 All team leaders and managers must:

- (a) promote and model child safety at all times;
- (b) monitor compliance of anzuk Team Member with this National Child Safety Policy, the Child Safety Code of Conduct and the Child Safety Procedure;
- (c) oversee the response and investigation of reports of child abuse or risk of harm to children or young people, where appropriate.

## **Consultants**

8.8 Consultants must:

- (a) promote and model child safety at all times;
- (b) sight, verify and record all Teacher Registrations and WWCCs (or equivalent in relevant states) and identify and monitor those that require renewal;
- (c) not allow anzuk Casual Employee/Educators to work without a valid Teacher Registration or WWCC (or equivalent in relevant states), including when a Teacher Registration or WWCC has expired or a negative notice is received, unless the Worker has applied for a WWCC and is legally permitted to work with children while their WWCC application is being processed;
- (d) collect, document and store information from applicants and their referees to assess their suitability for child-related work, including the information set out in 10.2 of this Policy;
- (e) ensure anzuk Casual Employees/Educators receive training and/or information at induction and at least every year thereafter as set out in 12.3 of this Policy;
- (f) ensure Workers provide written acknowledgment that they have read and agree to comply with this National Child Safety Policy, the Child Safety Code of Conduct and the Child Safety Procedure, and, in the case of anzuk Casual Employees/Educators, any policies, procedures and codes of conduct that apply at the Educational Institution in which they are placed on assignment;
- (g) undertake the recruitment strategies set out in 10.1 of this Policy; and
- (h) being familiar with the types of child abuse or risk of harm and be alert to any indications of such conduct, including harm caused by other children or young people.

## **Child Safety Officers (CSOs)**

- 8.9 CSOs are available to listen, discuss and clarify issues confronting Workers in relation to child abuse or risk of harm.

anzuk CSOs are responsible for:

- (a) being familiar with the types of child abuse or risk of harm and be alert to any indications of such conduct, including harm caused by other children or young people;
- (b) appointing, managing and overseeing the investigation of child abuse or risk of harm, and complaints under this Policy, where appropriate;
- (c) cooperating with any investigations into reports of child abuse or risk of harm to children or young people conducted by an Educational Institution, police, government department or regulator;
- (d) reporting any risks to child safety, including child abuse or risk of harm, to a member of the Executive Leadership Team;
- (e) promptly recording concerns, suspicions and reports of child abuse or risk of harm in the Child Safety Register (secure SharePoint location) as required, and specify the action(s) anzuk will take to reduce or remove the risks (i.e. risk controls) when anzuk is notified of child abuse or risk of harm;
- (f) reporting child abuse or risk of harm on behalf of anzuk, consistent with their authority and any directions by the CEO or a member of the Executive Leadership Team (which may include supporting Internal Team Members to meet their reporting obligations);
- (g) maintaining adequate, confidential records of all complaints, decisions and actions taken in relation to any concern, allegation, suspicion or report of child abuse or risk of harm; and
- (h) where it is appropriate and practical to do so, preventing, identifying and mitigating child safety risks, including child abuse or risk of harm, within Educational Environments;
- (i) ensuring Workers are aware of this National Child Safety Policy, the Child Safety Code of Conduct, the Child Safety Procedure and their overall child safety obligations, including the obligation to report suspected child abuse or risk of harm consistent with relevant legal obligations set out in the Child Safety Procedure;
- (j) assess the risk to child safety, including child abuse or risk of harm, within their area of control and take steps to reduce or eliminate any risk to the extent possible;
- (k) educate Workers about identifying and preventing child abuse or risk of harm;
- (l) make a record of risks and specify the action(s) anzuk will take to reduce or remove the risks (i.e. risk controls) when a Worker notifies them of an identified risk;

- (m) facilitate the reporting of any concerns regarding child safety including reports or disclosures of child abuse or risk of harm, as soon as possible; and
- (n) securely store Incident Reports and actions taken to address concerns of child abuse or risk of harm, including records taken by CSOs.

### **Customer Care Specialists**

8.10 Customer Care Specialists must:

- (a) promote and model child safety at all times;
- (b) conduct pre-screening safety checks, such as name and social media checks, for history of child abuse or risk of harm, for all anzuk Casual Employees/Educators prior to interview

### **People & Growth**

8.11 The Head of the People & Growth must:

- (a) ensure that this National Child Safety Policy, the Child Safety Code of Conduct and the Child Safety Procedure is reviewed and updated at least every year.
- (b) ensure, as far as possible, anzuk Internal Team Members are aware of:
  - (i) their obligations under this National Child Safety Policy, the Child Safety Code of Conduct and the Child Safety Procedure;
  - (ii) their responsibilities to create and maintain child safe environments, including a culturally safe environment for Aboriginal children and young people; and
  - (iii) acceptable and unacceptable behaviour in relation to children and young people;
- (c) ensure anzuk Internal Team Members are receive training and/or information at induction and at least every year thereafter as set out in 12.3 of this Policy;
- (d) where it is appropriate and practical to do so, ensure anzuk Internal Team Members hold a valid Teacher Registration or WWCC (or equivalent in relevant states), unless the Worker has applied for a WWCC and is legally permitted to work with children while their WWCC application is being processed.

### **National Leader - Customer Care**

8.12 The National Lead – Customer Care must ensure, as far as possible, that anzuk Casual Employees/Educations are aware of:

- (a) their responsibilities to create and maintain child safe environments, including a culturally safe environment for Aboriginal children and young people;
- (b) their obligations under this Policy, anzuk's Child Safety Code of Conduct and the Child Safety Procedure; and
- (c) acceptable and unacceptable behaviour in relation to children.

- 8.13 The National Lead – Customer Care is responsible for monitoring compliance of anzuk’s Casual Employees/Educators with this National Child Safety Policy, the Child Safety Code of Conduct and the Child Safety Procedure.

## **9 Child Safety Code of Conduct**

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- 9.1 The Child Safety Code of Conduct applies to all Workers. Internal Team Members must read and confirm that they understand and agree to comply with the Child Safety Code of Conduct, which will occur during induction.
- 9.2 Before working with children, anzuk Casual Employees/Educators must read and confirm that they understand and agree to comply with the Child Safety Code of Conduct, which will occur during induction.

## **10 Recruitment**

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- 10.1 anzuk engages in a range of recruitment strategies to ensure that Workers working with children and young people are suitable and supported to reflect child safety and wellbeing in practice, including:
- (a) developing clear position descriptions for jobs or categories of jobs that involve child-related work setting out:
    - (i) the job’s requirements, duties and responsibilities regarding child safety and wellbeing; and
    - (ii) the job occupant’s essential or relevant qualifications, experience and attributes in relation to child safety and wellbeing;
  - (b) examining written applications and engaging in interviews for applicants who will or may work with children, wherever possible;
  - (c) engaging in a thorough examination of a person’s suitability to work with children prior to inviting them to take a leadership position with children;
  - (d) obtaining reference checks;
  - (e) screening all persons that will, or could reasonably, work with children to verify that they have a valid Teacher Registration or WWCC (or equivalent in relevant states) (or the Worker has applied for a WWCC and is legally permitted to work with children while their application is being processed), and have registered anzuk as an employer on the WWCC, before they commence working with children at an Educational Institution, and keeping records of all relevant information; and
  - (f) informing all applicants for jobs that involve child-related work of anzuk’s child safety practices including this Policy, Child Safety Code of Conduct and Child Safety Procedures;
- 10.2 anzuk will make reasonable efforts to gather, verify and record the following information about a person whom it proposes to engage to perform child-related work:
- (a) Teacher Registration or WWCC status (or equivalent in relevant states) including confirmation that anzuk has been registered on the person’s

WWCC or similar check as employer (or the Worker has applied for a WWCC and is legally permitted to work with children while their application is being processed);

- (b) proof of personal identity and any professional or other qualifications;
- (c) the person's history of work involving children, including any history of reports, complaints, disciplinary action or allegations of reportable conduct made against the Worker in any capacity.

10.3 anzuk will not offer any applicant a position at anzuk until the applicant provides the required evidence to:

- (a) the People and Growth Team, in the case of anzuk Internal Team Members, or
- (b) a Consultant, in the case of anzuk Casual Employees/Educators.

10.4 anzuk will exercise discretion and may require applicants to provide a police check before they commence working with anzuk and at any time during their engagement with anzuk.

## **11 Risk Management**

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11.1 anzuk understands there may be a number of risks associated with the services and programs of Educational Institutions in which anzuk Casual Employees/Educators are placed on assignment in relation to:

- (a) images or videos taken of children during a program or event;
- (b) the supervision of children;
- (c) the online environments in which children engage with anzuk; and
- (d) overnight stays associated with anzuk.

11.2 To mitigate or prevent those risks, anzuk:

- (a) requires Workers to comply with the anzuk Privacy Policy and comply with responsibilities in relation to privacy and information sharing;
- (b) requires Workers to comply with the Child Safety Code of Conduct which establishes expected behavioural standards and responsibilities when having contact with children;
- (c) reviews risks, and monitors and evaluates the effectiveness of the implementation of its risk controls through the CSO;
- (d) makes child safety a part of anzuk's overall risk management strategy approach;
- (e) has policies to assess Workers in relation to compliance with their child safe obligations and continued suitability for child-related work; and
- (f) ensures appropriate training is conducted for Workers at induction and at least every year refresher training thereafter.

## 12 Training, development and support for Workers

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- 12.1 anzuk has strategies and safeguards in place to ensure that all Workers are adequately trained and supported to understand their obligations and responsibilities to create a child safe environment.
- 12.2 Those strategies and safeguards include:
- (a) induction and refresher training at least every year for all Workers to support their understanding of their reporting obligations and equip Workers with knowledge, skills and awareness to work with children;
  - (b) compliance with this Policy monitored by the CEO; and
  - (c) instructing and supporting Workers in complying with procedures for responding, suspecting and identifying child abuse or risk of harm.
- 12.3 anzuk will provide Workers with training and/or information at induction and at least every year thereafter, about:
- (a) this Policy, the Child Safety Code of Conduct and the Child Safety Procedure;
  - (b) child abuse or risk of harm in Educational Environments;
  - (c) recognising the indicators of child abuse or risk of harm;
  - (d) responding effectively to issues of child abuse or risk of harm;
  - (e) supporting colleagues who disclose harm or risk of harm;
  - (f) how to build culturally safe environments for children;
  - (g) their information sharing and recordkeeping obligations;
  - (h) how to identify and mitigate child abuse or risks of harm in Educational Environments without compromising a child's right to privacy, access to information, social connections and opportunities; and
  - (i) individual and collective obligations and responsibilities for managing child abuse or risk of harm, including reporting obligations and offences.

## 13 Communication

- 13.1 anzuk will communicate this Policy, the Child Safety Code of Conduct and the Child Safety Procedure in the manner below.

Educational Institutions	Workers
<ul style="list-style-type: none"> <li>• With the agreement between anzuk and the Educational Institution</li> <li>• Website (<a href="https://anzuk.education/au/home">https://anzuk.education/au/home</a>)</li> </ul>	<ul style="list-style-type: none"> <li>• Ready2Work App</li> <li>• SharePoint/Intranet</li> <li>• New Worker Induction Training and refresher training every year.</li> </ul>

## 14 Breaches

Workers must report any breach or suspected breach of this Policy, the Child Safety Code of Conduct or Child Safety Procedure to a CSO and/ or a member of the Executive Leadership Team as soon as possible after becoming aware of the breach or suspected breach.

- 14.1 If anzuk becomes aware of a suspected or actual breach of this Policy, Child Safety Code of Conduct or Child Safety Procedure, anzuk will take reasonable steps to ensure the safety and wellbeing of any child who may be at risk.
- 14.2 Suspected breaches of this Policy, the Child Safety Code of Conduct or Child Safety Procedure are treated seriously by anzuk and, where appropriate, will be addressed or investigated, either internally or externally, depending on the severity of the suspected breach, in a manner that ensures the safety and wellbeing of children is paramount and complies with any obligations set out in the Child Safety Procedure. Where appropriate, anzuk will cooperate with any investigations into reports of child abuse or risk of harm to children or young people conducted by an Educational Institution, police, government department or regulator.
- 14.3 anzuk will handle the allegations in a confidential manner to the greatest extent possible.
- 14.4 Following an investigation into a suspected breach, any person who is found to have breached this Policy, the Child Safety Code of Conduct or Child Safety Procedure may face disciplinary action, including termination of their engagement with anzuk.

## **15 Reporting and responding to child abuse or risk of harm to a child**

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anzuk is committed to ensuring that children and young people accessing the services and programs of Educational Institutions in which anzuk Casual Employees/Educators are placed on assignment are kept safe from child abuse or risk of harm.

- 15.1 When anzuk suspects child abuse or risk of harm, anzuk will respond to that suspicion in a child-focused manner which prioritises the safety of children and young people.
- 15.2 All Workers are required to follow the relevant procedure applicable to the State or Territory in which the child is situated (see the Child Safe Procedure).
- 15.3 anzuk will comply with obligations under any applicable state or territory laws, and will provide information to government agencies including police, and do all things necessary to assist with enquiries about child safety and risk of harm.

## **16 Investigations**

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- 16.1 Before commencing an investigation, the CEO will consult with relevant authorities and the Educational Institution to determine whether anzuk can commence an investigation.
- 16.2 Where appropriate, a member of the ELT will appoint an independent investigator to investigate allegations of child abuse or risk of harm against Workers and may appoint an investigator to investigate breaches of this Policy, the Child Safety Code of Conduct or Child Safety procedure.

The CSO will make every effort to keep any child safety investigation confidential. However, from time-to-time Workers may need to be consulted in conjunction with the investigation e.g., to provide witness statements.

- 16.3 anzuk will do all things reasonably necessary to cooperate with and assist in any investigations conducted by an Educational Institution, police, government department or regulator. anzuk will not allow an investigation to interfere with investigations conducted by a relevant government department, regulator or police.
- 16.4 An investigation conducted by anzuk will be conducted in accordance with procedural fairness to protect the integrity of the investigation and the interests of all the parties involved in the investigation.

## **17 Record keeping**

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- 17.1 All concerns, suspicions and reports of child abuse or risk of harm must be recorded in the form of an Incident Report (found at the end of the Child Safety Procedure). An Incident Report should record all relevant information related to the concern of child abuse or risk of harm, including:



- (a) the time and date of the alleged conduct, and whether it may be ongoing;
- (b) the names of people who witnessed, engaged in or experienced the behaviour (including the child);
- (c) the time and date of the alleged conduct;
- (d) observed behaviours, acts or omissions of concern, and any evidence of the alleged conduct or risk of harm.

17.2 CSOs are responsible for ensuring adequate records are maintained. The Worker who identified or witnessed the child abuse or risk of harm, or has a concern or suspicion about the same, must complete and provide the CSO and the relevant Educational Institution with an Incident Report. A CSO will support a Worker to complete the Incident Report on request. A CSO will ensure that all incidents of child abuse or risk of harm are securely recorded in the Child Safety Incident Register (secure SharePoint location), as required. The CSO will ensure that the following records are held and maintained indefinitely:

- (a) allegations, complaints and concerns of a breach of this Policy, Child Safety Code of Conduct or Child Safety procedure;
- (b) complaints, reports and disclosures of actual or suspected child abuse or risk of harm;
- (c) reports made to external government agencies or regulators including reports to police;
- (d) investigation reports, evidence and records of interview in relation to any investigation under this policy; and
- (e) all decisions and actions taken in relation to any child safety complaint, report of a breach or disclosure received.

## 18 Privacy

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18.1 anzuk will collect, use, disclose and hold personal information in accordance with the *Privacy Act 1988* (Cth) and its Privacy Policy.

### Principles

18.2 There are two guiding principles in respect to a child's privacy.

- (a) **Best interests:** anzuk and all Workers will do what they believe is in the best interest of the child. The paramount consideration is the safety of children.
- (b) **Respect privacy:** anzuk and all Workers will respect a child's privacy, except when this conflicts with the best interests principle. This means acting consistently with the Australian Privacy Principles and the anzuk Privacy Policy.

18.3 As much as is reasonably possible, an individual's privacy is to be protected. Individuals who make reports or disclosures of abuse and individuals who are the subject of accusations are all entitled to privacy.

### Disclosing information and privacy

- 18.4 Workers must act consistently with the anzuk Privacy Policy, this Policy, the Child Safety Code of Conduct, the Child Safety Procedure and relevant statutory requirements.
- 18.5 Where a disclosure, such as reporting to a government department, regulator or police, is required or authorised by a law, the disclosure will not be a breach of privacy. See the Child Safety Procedure for the applicable reporting requirements for each State and Territory.

## 19 Monitoring and review

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- 19.1 anzuk welcomes feedback on how it can improve its risk management approach and better protect the safety of children. Please direct feedback to the CEO or another member of the Executive Leadership Team in writing. A review of this National Child Safety Policy, the Child Safety Code of Conduct and the Child Safety Procedure shall be conducted every year.

## 20 Related Policies, Procedures and Legislation

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- 20.1 Related policies include:

- (a) anzuk Child Safety Procedure;
- (b) anzuk Child Safety Code of Conduct;
- (c) anzuk Privacy Policy;

- 20.2 This Policy must be read in conjunction with:

- (a) The law of the Commonwealth;
- (b) Laws of each State and Territory including:
  - (i) *Child Wellbeing and Safety Act 2005* (Vic);
  - (ii) *Children, Youth and Families Act 2005* (Vic);
  - (iii) *Worker Screening Act 2020* (Vic)
  - (iv) *Children's Guardian Act 2019* (NSW)
  - (v) *Children and Young Persons (Care and Protection) Act 1998* (NSW)
  - (vi) *Child Protection (Working with Children) Act 2012* (NSW)
  - (vii) *Child Protection Act 1999* (Qld);
  - (viii) *Working with Children (Risk Management and Screening) Act 2000* (Qld);
  - (ix) *Parliamentary Commissioner Amendment (Reportable Conduct) Act 2022* (WA);
  - (x) *Children and Community Services Act 2004* (WA);
  - (xi) *Working with Children (Screening) Act 2004* (WA);
  - (xii) *Ombudsman Act 1989* (ACT);

- (xiii) *Children and Young People Act 2008 (ACT)*;
- (xiv) *Working with Vulnerable People (Background Checking) Act 2011 (ACT)*.