



Child Safe and Under-18 Safety Procedure

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1.0 PURPOSE

The purpose of this procedure is to ensure EMPOWA Training identifies and manages risks to the safety, wellbeing and cultural safety of learners under 18 and children/young people who interact with RTO services.

2.0 SCOPE

This procedure and its associated procedures apply to IUIH Board Members, IUIH CEO, relevant IUIH Executive Leaders, EMPOWA Training RTO Committee Members, EMPOWA Training (EMPOWA) staff and IUIH staff affiliated with EMPOWA.

EMPOWA ensures that where a third party is registered to provide services on behalf of EMPOWA, will be subject of a written agreement, and services delivered comply with this policy and its associated procedures.

3.0 DEFINITIONS

Unless otherwise specified, all terms in this document have the same meaning assigned to them in TRG-POL-006 RTO Governance Policy.

4.0 PROCEDURE CONTEXT

Category	Reference
Legislation	Child Safe Organisations Act 2024 (Qld); Working with Children (Risk Management and Screening) Act 2000 (Qld); Work Health and Safety Act 2011 (Qld); Privacy Act 1988 (Cth).
Standards	Outcome Standards for NVR Registered Training Organisations 2025 - Standard 4.3, with links to Standards 2.5 and 2.6.
Related policies/procedures	TRG-POL-007 Operations Management Policy; TRG-PRO-033 RTO Risk Management Procedure; TRG-PRO-031 Work Placement Procedure; TRG-PRO-018 Learner Support and Progression Procedure; TRG-PRO-034 Conflict of Interest Procedure; TRG-PRO-014 Complaints and Appeals Procedure.
IUIH frameworks	Keeping our Jarjums Safe: Our Ways and Obligations (Child Safeguarding and Wellbeing Policy); IUIH Code of Conduct for interacting with children and young people; IUIH Child and Youth Risk Management Strategy.

5.0 PROCEDURE

5.1 Commitment and principles

EMPOWA is committed to safeguarding and supporting the wellbeing of children and young people who engage with RTO services. Child safeguarding is everyone's business and is grounded in IUIH's

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Cultural Integrity Investment Framework, The Ways Statement, Aboriginal and Torres Strait Islander Terms of Reference, and a strengths-based approach to safe, inclusive and respectful learning environments.

- Ways of Seeing - the primacy of family, kinship and custodial responsibility is recognised in learner support and safeguarding decisions.
- Ways of Knowing - staff understand their obligations and know how to identify, report and respond to concerns.
- Ways of Doing - processes are practical, culturally responsive and implemented through training, supervision and records.
- Ways of Belonging - learners under 18 are supported to participate safely, respectfully and with dignity.
- Ways of Being - safeguarding decisions are collective, transparent and grounded in relationships, accountability and care.

5.2 When this procedure applies

This procedure applies when EMPOWA enrolls, engages, communicates with, trains, assesses, supports, supervises or places learners under 18, or where staff interact with children or young people in EMPOWA activities. It also applies to online environments, excursions, work placement, community-based learning, events, marketing/photography and any situation where an under-18 learner may be present.

5.3 Risk management for under-18 learners

1. Identify whether the cohort includes learners under 18 or whether children/young people may be present during activities.
2. Complete an under-18 learner safety risk assessment for the course, activity, placement or event.
3. Confirm Blue Card, screening, supervision, transport, communication, photography/media consent, online safety and wellbeing controls as relevant.
4. Record controls in the training/placement file and RTO Risk Register where risk is Medium or above or requires monitoring.
5. Escalate concerns, suspected harm, breaches or incidents immediately under IUIH and RTO reporting pathways.

5.4 Code of conduct expectations

All staff, trainers, assessors, contractors, students and volunteers must interact with children and young people in a way that is safe, culturally responsive, respectful and appropriate to the learning context. Staff must comply with IUIH code of conduct expectations for interacting with children and young people and must never use behaviour, language, communication, physical contact or digital

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contact that is unsafe, discriminatory, coercive, secretive, humiliating or inconsistent with professional boundaries.

5.5 Responding to disclosures, suspicions or concerns

- Listen calmly and respectfully; do not investigate beyond what is necessary to understand and report the concern.
- Prioritise immediate safety and wellbeing of the learner or child/young person.
- Record the concern factually, using the approved incident/concern record.
- Notify the RTO Manager and relevant UIH safeguarding/governance contact as soon as practicable.
- Follow mandatory reporting, blue card, child safeguarding, complaints, incident, privacy and risk procedures as applicable.
- Consider learner support, reasonable adjustment and wellbeing referrals while maintaining confidentiality and information-sharing boundaries.

5.6 High-risk activities

High-risk activities involving under-18 learners require documented planning before commencement. This includes work placement, one-to-one support, transport, offsite activities, online/digital contact, activities involving personal care or sensitive discussion, photography/media, and activities delivered by third parties or host employers.

- Document the activity, participants, supervision ratio, staff/host responsibilities, screening requirements and emergency arrangements.
- Confirm learner and parent/guardian communication and consent requirements where appropriate.
- Assess cultural, physical, psychological, emotional, spiritual and online safety risks.
- Record monitoring, incidents and post-activity review outcomes.

Position	Responsible for
UIH Board / ELT	Maintain organisational oversight of child safeguarding obligations and child safe culture.
Director, Organisational Development	Receives escalated child safe or under-18 learner risks involving RTO operations.
RTO Manager	Ensures under-18 learner risks are assessed, controlled, recorded and escalated.
Trainers, assessors and staff	Follow child safe conduct requirements and report concerns immediately.
Work placement hosts / third parties	Meet screening, supervision, safety and reporting requirements for under-18 learners.

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7.0 VERSION CONTROL & DOCUMENT HISTORY

Ver.	Approved by	Approval Date	Summary of Modifications	Next Review Date
1.0	Director, Organisational Development	15/12/2024	New procedure	15/12/2027
2.0	RTO Manager	01/07/2025	Updated to reflect the 2025 standards	01/07/2027