

Child Safety and Wellbeing Policy

PURPOSE

This policy sets out Trainwest's commitment to protecting the safety and wellbeing of children and young people who participate in its training, assessment and related activities.

It also outlines the measures used to identify, prevent and respond to risks to the safety and wellbeing of students aged under 18, in accordance with Outcome Standard 4.3(d) of *National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025* and the *National Principles for Child Safe Organisations*.

Trainwest is part of Keystone Training Group.

SCOPE

This policy applies to:

- all staff, trainers and assessors, contractors, consultants, volunteers, governing persons, and third-party providers engaged by or on behalf of the RTO
- all activities undertaken by or on behalf of the RTO where students aged under 18 may participate, including on-campus, workplace-based, online, blended, and community-based delivery.

This policy should be read in conjunction with the **Child Safety Risk Management Procedure**.

POLICY STATEMENT

Trainwest is committed to providing a safe, inclusive and supportive environment for children and young people. Its child safety approach is aligned with the **National Principles for Child Safe Organisations** and is guided by:

- leadership and accountability
- participation and empowerment
- family and community partnership
- equity and inclusion
- safe people and environments
- continuous improvement.

POLICY

Our Commitment

Leadership and Accountability

The RTO will:

- maintain governance and oversight arrangements that support child safety across its operations
- assign responsibility for coordinating child safety implementation, training, incident reporting and monitoring
- ensure child safety is supported through appropriate leadership, resourcing and review mechanisms.

Safe Culture

The RTO will:

- embed child safety into governance, operational oversight, quality assurance, compliance and risk management processes
- promote a culture of respect, inclusion, accountability and speaking up
- require all personnel to uphold respectful behaviour, appropriate professional boundaries, and child-safe practices at all times, including in online environments
- not tolerate behaviour that is inappropriate, exploitative, abusive, or grooming in nature.

Child Participation and Empowerment

The RTO will:

- provide children and young people with accessible, age-appropriate information about their rights, safety, expected behaviour, and how to raise concerns
- provide clear, accessible and appropriate options for reporting concerns, including confidential reporting pathways where suitable
- create opportunities for students under 18 to give feedback and participate in decisions that affect their learning experience, safety and wellbeing
- ensure the designated Child Safety Officer is clearly identified and accessible to students, staff, parents, carers and relevant stakeholders.

Family and Community Engagement

The RTO will:

- provide parents and carers with relevant information about training environments, supervision arrangements and communication methods for students under 18
- engage with employers, industry representatives, community partners and third-party providers in a way that supports the safety and wellbeing of children and young people
- consider child safety obligations when planning, delivering and reviewing workplace-based or other external delivery arrangements.

Equity, Inclusion and Cultural Safety

The RTO will:

- provide a learning environment that is inclusive, respectful and responsive to the needs of children and young people from diverse backgrounds
- support culturally safe practices across workforce management, training delivery and student engagement
- recognise Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the lands on which the RTO operates
- promote equitable access to information, support and participation for all students under 18.

Risk Identification and Management

The RTO will identify, assess and manage risks to the safety and wellbeing of students under 18 in accordance with the **Child Safety Risk Management Procedure**.

This includes:

- considering child safety risks across training content, delivery modes, learning environments and supervision arrangements
- conducting documented child safety risk assessments across relevant delivery contexts
- implementing, monitoring and reviewing controls to reduce identified risks
- addressing risks associated with online, blended, workplace-based and community-based delivery
- managing personal information relating to children and young people securely and confidentially, with access limited to authorised personnel.

Recruitment and Screening

The RTO will apply a role-based approach to recruitment and screening to ensure personnel engaged in child-related work are suitable, appropriately vetted, and able to uphold child-safe practices.

This includes:

- requiring personnel engaged in child-related work to hold and maintain a valid Working With Children Check or applicable state or territory equivalent where required
- conducting appropriate reference and background checks before engagement, where relevant to the role
- clearly defining child-safety responsibilities and behavioural expectations in position descriptions, role documentation, contracts, or engagement arrangements
- requiring contractors, volunteers and third-party providers to demonstrate and maintain compliance with child-safety obligations as a condition of engagement and ongoing service delivery.

Education and Training

The RTO will support all personnel to understand and fulfil their child safety responsibilities through induction, ongoing training, and access to relevant guidance.

This includes:

- child safety induction for relevant personnel
- regular refresher training and professional development
- guidance on recognising, preventing and responding to abuse, harm, neglect, grooming and other child safety concerns
- training on disclosures, cultural safety, professional boundaries and online safety.

Responding to Concerns and Incidents

The RTO will ensure that all child safety concerns, incidents and allegations are managed promptly, appropriately and in accordance with applicable legislation and organisational procedures.

This includes:

- requiring any staff member who forms a reasonable belief that a child has been, or is at risk of being, abused or harmed to report the concern immediately through approved reporting channels or directly to external authorities where required by law
- assessing, managing and responding to reports in a timely, confidential and appropriate manner
- supporting students and, where appropriate, their families or carers throughout the process
- recording, monitoring and reviewing concerns, incidents and outcomes to inform ongoing improvement.

Quality Management

This policy forms part of our **Quality Management System (QMS)**. It is reviewed annually in accordance with the **Internal Audit Procedure** and is supported by ongoing quality assurance activities. Additional reviews may occur based on risk, feedback, or regulatory change.

Findings from incident reviews, audits, and feedback inform continuous improvement actions. Records related to this policy must be maintained as per the **Records Management Policy**. Documents must be version-controlled, stored in approved systems, and retained for audit, compliance, and quality assurance purposes.

Non-compliances, risks, issues and improvements are recorded and addressed in line with the **Continuous Improvement Policy**. Staff are encouraged to submit a **Continuous Improvement (CI) Request** to raise concerns or suggest improvements.

Child Safety Contact

Any concerns about the safety or wellbeing of a child or young person should be reported to the Child Safety Officer at cso@ktg-training.com.au.

RESPONSIBILITIES

Chief Executive Officer (CEO) and Governing Persons	<ul style="list-style-type: none"> • Endorse and oversee this policy across operations. • Ensure adequate governance, resources, and monitoring systems for child-safety compliance. • Champion a culture of safety, inclusion, and accountability consistent with the National Principles for Child Safe Organisations. • Review organisational performance and incident data to drive continuous improvement.
Quality & Compliance Department	<ul style="list-style-type: none"> • Maintain this policy and oversee implementation across operations. • Ensure alignment with Outcome Standard 4.3(d) and relevant legislation. • Coordinate annual compliance reviews, internal audits, and management reporting. • Provide high-level advice, guidance, and professional development on child-safety governance.
Child Safety Officer	<ul style="list-style-type: none"> • Act as the primary contact for child-safety matters across operations. • Support the consistent application of procedures and ensure concerns are managed appropriately. • Provide regular updates to the CEO, Management, and Board on incidents, training, and improvement actions.
Managers and Supervisors	<ul style="list-style-type: none"> • Model and reinforce child-safe behaviours and practices within their teams. • Ensure all team members complete required child-safety training and hold valid WWCCs. • Escalate concerns or breaches through approved reporting channels.
All Staff and Contractors	<ul style="list-style-type: none"> • Comply with this policy, the Employee Code of Conduct, and all related procedures. • Act immediately on any concern or suspicion of harm to a child or young person.
Students, Families and Stakeholders	<ul style="list-style-type: none"> • Are encouraged to raise concerns or feedback on safety and wellbeing. • Will be treated respectfully and supported through appropriate follow-up and communication.

DEFINITIONS

Child / Young Person	Any individual under 18 years of age.
Child Abuse	Acts of physical, sexual, emotional, or psychological abuse, neglect or grooming as defined by relevant state/territory law.
Child-Related Work	Any role, duty, or service that involves direct contact with, supervision of, or access to children or young people as part of training, assessment, or operational delivery.
Child Safety	The proactive measures and organisational culture that protect children and young people from harm, abuse, neglect, or exploitation within all environments—physical, virtual, and online.
Child Safety Officer (CSO)	Designated person(s) responsible for receiving and responding to concerns about child safety.
Child Wellbeing	The holistic state of safety, health, development, and dignity of a child or young person, supported through positive learning environments and responsive support services.
Disclosure	When a child or young person shares information that indicates they have been, or may be, harmed, abused, or neglected.
Harm	Any detrimental effect on a child’s physical, psychological, or emotional wellbeing, whether through abuse, neglect, or exposure to unsafe environments.
National Principles for Child Safe Organisations	A nationally endorsed framework that sets out ten principles for creating organisational cultures, systems, and environments that prioritise the safety, wellbeing, participation, and rights of children and young people. The Principles guide organisations to prevent harm, respond effectively to concerns, and continuously improve child-safe practices.
Registered Training Organisation (RTO)	A training provider registered by a state or national regulatory body, authorised to deliver and assess nationally recognised training in Vocational Education and Training (VET).
Reportable Concern	Any information, observation, or suspicion that indicates potential risk to a child’s safety or wellbeing, requiring action in line with this policy and relevant reporting procedures.
Risk Assessment	The process of identifying and evaluating potential threats to child safety within training content, delivery modes or environments.
Staff	Refers to all individuals employed or engaged by the RTO (either directly or under contractual arrangements) who contribute to the operations, delivery, support, or management of training and assessment services.
Student	Person receiving training and/or assessment services provided by an RTO, or by a third-party on their behalf, and includes learners, participants, candidates and trainees.
Working With Children Check (WWCC)	A screening process undertaken to assess a person’s suitability to work with children, as required by applicable state or territory legislation.

RELATED DOCUMENTS

Internal

Policies	<p>Employee Code of Conduct</p> <p>Risk Management Policy</p> <p>Student Code of Conduct</p> <p>Student Information Policy</p> <p>Student Support Policy</p> <p>Workforce Management Policy</p>
Procedures	<p>Child Safety Incident and Reporting Procedure</p> <p>Child Safety Risk Management Procedure</p> <p>Recruitment and Selection Procedure</p> <p>Risk Management Procedure</p> <p>Workforce Capability Verification Procedure</p>
Guides	<p>Child Safety Framework</p> <p>Risk Management Plan</p> <p>Student Handbook</p> <p>Third-Party Student Handbook</p>
Systems	<p>Child Safety Library</p> <p>Continuous Improvement Register (CIR)</p> <p>Incident Register</p> <p>Risk Register</p>

External

Legislation and Regulatory Instruments	<p>National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025</p> <p>National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025</p> <p>National Vocational Education and Training Regulator Act 2011</p> <p>Privacy Act 1988 (Cth)</p> <p>Australian Human Rights Commission Act 1986 (Cth)</p> <p>Fair Work Act 2009 (Cth)</p> <p>Work Health and Safety Act 2011 (Cth)</p>
Guidance and Resources	<p>National Principles for Child Safe Organisations</p> <p>Introduction to the National Principles for Child Safe Organisations (AHRC)</p> <p>ASQA Practice Guide: Risk management</p>