

1. Purpose

Orange College (OC) is committed to the safety, participation, and empowerment of all children and young people, especially those under 18 engaged in vocational education and training (VET). This policy affirms OC's zero-tolerance approach to child abuse, including physical, sexual, emotional, and psychological harm or neglect. This policy supports OC's obligations under relevant Outcome Standards of the Standards for Registered Training Organisations 2025 (SRTOs 2025), particularly those related to child safety, wellbeing, equity, and inclusion.

2. Scope

This policy applies to:

- All OC employees, trainers/assessors, contractors, and volunteers
- Students under the age of 18 enrolled in VET programs or accessing OC services
- All learning and administrative environments (online, in-person, third party delivery)

3. Responsibilities

3.1 General Responsibilities

OC acknowledges that child safety is a shared responsibility across all levels of the organisation. The following outlines the key responsibilities held by different members of the OC community:

- **Chief Executive Office**
The CEO is responsible for ensuring that child safety and wellbeing obligations are integrated into governance, strategy, and operational delivery. This includes ensuring that resources are allocated to support implementation and that the organisation remains compliant with relevant legislation and the Standards for RTOs 2025.
- **Child Safety Officer**
OC has appointed a Child Safety Officer to act as the primary contact for all child safety matters. The Child Safety Officer's responsibilities are further discussed in section 3.2 of this policy.
- **Managers and Supervisors**
OC's leaders and supervisors are responsible for promoting a strong culture of child safety across all work areas. They must ensure that work environments are safe for children and that staff under their supervision understand and apply
- **All OC staff, including contractors and volunteers**
All OC personnel must adhere to this policy and uphold OC's commitment to child safety and wellbeing. Their responsibilities include:
 - Completing required child safety training and maintaining awareness of child protection obligations
 - Taking immediate action when they observe or suspect child abuse or harm
 - Reporting concerns to the Child Safety Officer or other relevant authority
 - Supporting children to feel safe, heard, and respected
- **Students and families**
Students and their families are encouraged to participate in promoting a safe environment. They are invited to raise any concerns, contribute feedback, and support OC's commitment to inclusion, empowerment, and the protection of all children

3.2 Child Safety Officer

OC appoints a designated Child Safety Officer to oversee its child safety framework and be the first point of contact for any child safety concerns, disclosures, or allegations. The Child Safety Officer:

- Acts as the central liaison for children, parents, and staff on matters related to child wellbeing and protection;
- Is responsible for receiving, documenting, and escalating concerns regarding suspected harm or abuse;
- Ensures OC's practices remain compliant with relevant child protection laws and the Standards for RTOs 2025, particularly principles supporting learner safety, inclusion, and wellbeing;
- Supports training of staff in child safety awareness and reporting obligations;
- Promotes a culture where child safety is embedded in daily organisational practice.

Designated Child Safety Officer:

Donna Laz

Email address: donna@orange.edu.au

4. Policy

OC is committed to promoting diversity and tolerance, and people from all walks of life and cultural backgrounds are welcome. In particular, we:

- Promote the cultural safety, participation and empowerment of Aboriginal children;
- Promote the cultural safety, participation and empowerment of children from culturally and/or linguistically diverse backgrounds; and
- Ensure that children with a disability are safe and can participate equally

OC maintains a proactive, inclusive, and preventative approach to child safety and wellbeing. We comply with all relevant state and Commonwealth child protection laws, the Child Safe Standards, and our obligations under SRTOs 2025 – especially those supporting learner inclusion, reporting, safety, and staff conduct.

OC acknowledges that child abuse can occur in any setting and takes all reasonable steps to prevent harm, particularly among students and prospective students under 18.

All staff, contractors, volunteers, and any individual engaged by OC are required to comply with this policy, including reporting suspected harm or risk of harm in accordance with internal procedures and relevant state legislation.

As part of its commitment to being a child-safe organisation, OC:

- Embeds a visible culture of child safety in everyday practices across all departments
- Maintains strong leadership that prioritises and reinforces child safety at all organisational levels
- Places the safety and wellbeing of children as a fundamental consideration in every decision and process;
- Maintains well-documented and accessible policies and procedures that actively support a child-safe approach;
- Encourages and empowers children to participate in shaping their learning environment and to raise concerns freely;
- Identifies, assesses, and responds to risks of abuse within the organisation as part of ongoing risk management;
- Promotes inclusive practices for children with disability, Aboriginal and Torres Strait Islander children, and culturally and linguistically diverse communities.

These organisational actions reflect OC's belief that child safety is not solely a compliance issue but an essential pillar of ethical and quality training delivery.

4.1 Code of Conduct

All OC personnel must uphold high standards of conduct when interacting with children, consistent with OC's child safety commitment.

Required Conduct

- Upholding OC's Child Safety and Wellbeing Policy and Statement of Commitment at all times.

- Taking all reasonable steps to protect children from abuse.
- Listening and responding to the views and concerns of children, particularly if they are telling you that they or another child has been abused and/or are worried about their safety or the safety of another child.
- Promoting the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander children.
- Promoting the cultural safety, participation and empowerment of children with culturally and/or linguistically diverse backgrounds.
- Promoting the safety, participation and empowerment of children with disabilities.
- Ensuring as far as practicable that adults are not left alone with a child.
- Reporting any allegations of child abuse to the Child Safety Officer & OC management and ensure any allegation is reported to the police or child protection.
- Reporting any child safety concerns to the Child Safety Officer & OC management.
- If an allegation of child abuse is made, ensure as quickly as possible that the child(ren) is/are safe.
- Encouraging children to 'have a say' and participate in all relevant organisational activities where possible, especially on issues that are important to them.

Prohibited Conduct

- Develop any 'special' relationships with children that could be seen as favouritism.
- Exhibit behaviours with children which may be construed as unnecessarily physical.
- Put children at risk of abuse.
- Do things of a personal nature that a child can do for themselves.
- Engage in open discussions of a mature or adult nature in the presence of children.
- Use inappropriate language in the presence of children.
- Express personal views on cultures, race or sexuality in the presence of children.
- Discriminate against any child, including because of culture, race, ethnicity or disability.
- Have organised contact with a child or their family outside of our organisation without our child safety officer's knowledge and/or consent.
- Have any inappropriate online contact with a child or their family.
- Ignore or disregard any suspected or disclosed child abuse.

By observing these standards, all personnel acknowledge individual responsibility to immediately report any breach of this code to the Child Safety Officer & OC management.

4.2 Recruitment and Screening

Relevant Legislation and Provider Requirements

The following legal requirements must be adhered to by all OC personnel and contractors prior to engagement:

- [NSW Office of the Children's Guardian Working with Children Check](#)
- [Child Protection \(Working with Children\) Act 2012](#)
- [Child Protection \(Working with Children\) Regulation 2013](#)

All OC staff, agents, and contractors who work directly with students must undergo:

- National Police Check
- A valid Working with Children Check (WWCC) based on state/territory requirements
- Role-appropriate screening under the [NSW Office of the Children's Guardian guidelines](#)

Screening checks must be updated every 3-5 years as per jurisdictional standards.

State and Territory Requirements

In addition to the above, the following state jurisdictional checks also apply to OC personnel providing services in these jurisdictions. Personnel must have completed and provided an appropriate check before commencing employment or engagement

Jurisdiction	Requirements
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Australian Capital Territory	All personnel providing services in the Australian Capital Territory must undertake registration with the Statutory Screening Unit in line with the Children and Young People Act 2008 (ACT). Checks are valid for three years.
New South Wales	All personnel providing services in New South Wales must undertake screening following the requirements of the Child Protection (Working with Children) Act 2012 (NSW). Checks are valid for five years.
Northern Territory	All personnel providing services in the Northern Territory must undertake a Working with Children Check, known as a 'Clearance Notice' as per the Care and Protection of Children Act 2014 (NT). Checks are valid for two years.
Queensland	All personnel providing services in Queensland must obtain a Suitability Card or Blue Card by the requirements of the Commission for Children and Young People and Child Guardian Act 2000 (QLD). Checks are valid for two years.
South Australia	All personnel providing services in South Australia must undertake screening by the requirements of the Children's Protection Act 1993 (SA). Checks are valid for three years.
Tasmania	All personnel providing services in Tasmania must undertake screening according to the requirements of the Registration to Work with Vulnerable People Act 2013 (TAS). Checks are valid for three years.
Victoria	All personnel providing services in Victoria must undertake a Victorian "Working with Children" check as a component of the recruitment process, in line with the Working with Children Act 2005 (VIC). Checks are valid for five years.
Western Australia	All personnel providing services in Western Australia must undertake a Working with Children Check by the Working with Children Screening Unit of the Western Australian Department of Community Development by the Working with Children (Criminal Record Checking) Act 2004 (WA). Checks are valid for three years.

It is the responsibility of each individual to register for and obtain the required check(s). Potential personnel with adverse findings in these checks undertaken at the time of recruitment will not be employed within a student service role.

4.3 Risk Management

OC applies a proactive, prevention-focused risk management approach to protect children from harm in all learning and operational environments. Risk controls include: Identifying and managing physical, social, and online environments where child abuse risks may arise

- Supervision strategies that ensure visibility, accountability, and safe spaces for all learners
- Ongoing assessment of risks relating to facilities, programs, and staff-child interactions
- Embedding risk considerations into program design, delivery, and staff induction and training.

Training and Supervision

OC culture aims for all individuals to feel confident and comfortable in discussing any allegations of child abuse or child safety concerns.

OC will support personnel through ongoing supervision to ensure they understand our organisation's commitment to child safety and that everyone has a role to play in protecting children from abuse, as well as checking that their behaviour towards children is safe and appropriate.

All staff will complete mandatory child safety training at induction and at regular intervals thereafter. The training includes, but is not limited to:

- Recognising signs of abuse
- Reporting obligations
- Cultural safety and inclusive practice

- Practices on learner wellbeing

Regular review

OC reviews this policy regularly and follows any significant incidents that may occur. Where possible, we do our best to work with families, children, local Aboriginal communities, culturally and/or linguistically diverse communities and people with a disability.

5. Child Abuse Reporting and Procedures

OC takes all allegations seriously and has practices in place to investigate thoroughly and quickly. Personnel are trained to deal appropriately with allegations.

We work to ensure all children, families and personnel know what to do and who to tell if they observe abuse or are victims and if they notice inappropriate behaviour. We all have a responsibility to report an allegation of abuse if we have a reasonable belief that an incident took place.

OC personnel must report concerns about the safety, welfare and wellbeing of students protected under the Child Protection (Working with Children) Act 2012, to the NSW Department of Family and Community Services and Justice by the legislative requirements.

Reporting child abuse is a community-wide responsibility. Child abuse includes any act committed against a child involving:

- Physical violence;
- Sexual offences;
- Serious emotional or psychological abuse; and
- Serious neglect

Call the police on 000 if you have immediate concerns for a child's safety.

All OC personnel are required to report to the police if they know or reasonably believe that a sexual offence has been committed by an adult against a child under the age of 16. It is a criminal offence (failure to disclose) to fail to comply with this obligation across jurisdictions.

5.1 What is a 'reasonable belief'?

A 'reasonable belief' is not the same as having proof. A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds. For example, a 'reasonable belief' might be formed when:

- A child states that they have been sexually abused;
- A child states that they know someone who has been sexually abused (sometimes the child may be talking about themselves);
- Someone who knows a child states that the child has been sexually abused;
- Observations of the child's behaviour or development led to a belief that the child has been sexually abused; or
- Signs of sexual abuse led to a belief that the child has been sexually abused.

A reasonable belief is a deliberately low threshold. This enables authorities to investigate and take action.

If a person 16 years or older provided you with the information and they do not have an intellectual disability and they do not want the information reported to the police, an individual is then not required to report to the police.

OC will not tolerate incidents of child abuse. All personnel understand their obligation to notify relevant authorities as soon as practicable if they have a reasonable suspicion that a minor has been, or is being, abused or neglected by a member of their family or any other individual:

- Australian Capital Territory Child Protection Line - 1300 556 728
- New South Wales Child Protection Line - 13 21 11
- Northern Territory Child Protection Line - 1800 700 250

- Queensland Child Safety Line - 1800 177 135
- South Australia Child Abuse Report Line - 13 14 78
- Tasmania Child Protection Line - 1300 737 639
- Victoria Child Protection Crisis Line - 13 12 78
- Western Australia Child Protection Line - 13 14 44

5.2 Four Critical Actions (Adapted from NSW Child Safe Standards)

OC staff must take all four actions immediately when they witness, suspect, or receive a disclosure of abuse:

Action 1: Respond to Emergency

- Ensure the child is safe
- Separate involved parties
- Call for urgent medical or police help
- Administer first aid as needed

Action 2: Report to Authorities

- Report to Police and/or Child Protection
- Notify the OC Child Safety Officer and management
- Record facts using the child's words

Action 3: Contact Parents/Carers

- Seek advice from Police/Child Protection before contacting families
- In cases where the child may be at risk at home, delay contact

Action 4: Provide Ongoing Support

- Offer counselling, support plans, and safety planning
- Keep families and children informed with updates

5.3 Responding to Disclosures

Orange College is committed to ensuring safe, appropriate, and culturally sensitive responses to disclosures of abuse. All OC personnel must be trained and prepared to respond respectfully and promptly to any child or parent/carer who raises a concern.

When a Child Discloses Abuse

OC staff will:

- Discreetly separate the child from peers to ensure privacy
- Listen carefully without interrupting, allowing the child speak in their own words;
- Remain calm and reassuring, affirming that:
 - What the child is saying is taken seriously
 - It is not their fault
 - They are doing the right thing by speaking up
- Avoid promises of secrecy. Instead, explain that they will explain I will do my best to help you and keep you safe, but I may need to share this with people who can help
- Stay with the child if they remain distressed;
- Assist them in completing an incident report form, or complete it together;
- As soon as possible, record the disclosure using the child's exact words;
- Report the matter to the Child Safety Officer, OC management, and relevant external authorities;
- Ensure accurate recording and secure storage of all information.

When a Parent/Carer Discloses a Concern or Incident

OC staff must:

- Explain that OC treats all abuse allegations with the utmost seriousness;
- Ask about the wellbeing of the child;

- Allow the parent/carer to describe the situation in their own words;
- Take notes to accurately record all details;
- Explain clearly that the disclosure may need to be reported to OC management, the Child Safety Officer, the police, or child protection agencies
- Avoid giving early reassurances about outcomes, but ensure to do their best for the child's safety
- Provide or assist with an incident report form
- Discuss the next steps and ask what action the parent/carer would like to take
- Ensure secure and accurate documentation
- Be aware of and respond to barriers to disclosure, especially for:
 - Aboriginal and Torres Strait Islander communities
 - Culturally and linguistically diverse backgrounds
 - Individuals with disability or neurodivergence

Cultural, linguistic, and disability-related barriers must be recognised and appropriately addressed during disclosures.

6. Reporting and Record Keeping

OC ensures that reporting and documentation practices meet the expectations outlined in SRTOs 2025, which require accurate and secure handling of learner information. Reports are regularly reviewed, and all records related to safety, wellbeing, and incident response are securely stored in compliance with data integrity principles.

OC management uses appropriate tools to inform decision-making, such as the online Mandatory Reporter Guide, professional judgment or specialist advice, where there are concerns about the risk of harm.

The mandatory reporter guide is available at: <https://reporter.childstory.nsw.gov.au/s/>

7. Complaints and Allegations Management

OC is committed to fair, prompt, and trauma-informed management of complaints. Key practices include:

- Reporting channels through Child Safety Officer or direct to Police;
- Clear documentation using OC's incident form;
- Respectful treatment of all parties involved;
- Updates provided to affected children and their families.

Allegations must be investigated transparently, with findings used to inform practice improvements.

Fair Procedures for Personnel

While the child's safety is paramount, OC ensures staff accused of misconduct are treated with procedural fairness. The decisions made by OC when recruiting, assessing incidents, and undertaking disciplinary action will always be thorough, transparent, and based on evidence.

All records are securely stored. All records are securely stored in accordance with OC's recordkeeping policy.

If an allegation of abuse or a safety concern is raised, we provide updates to children and families on progress and any actions we as an organisation take.

Business Activity	Output	Effect of Output	Risk (H-M-L)	Impact (H-M-L)	Mitigating Tools	Last Review	Reviewer
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Child Safety	Protection of minors Reinforcement/protection of brand	Organisational culture of safety for children and young people under the age of 18 - leadership, public commitment, and frequent messaging	H	H	Child Safety Policy Code of conduct for child safety Strategies to embed an organisational culture of child safety implemented Statement of commitment to safety for children and young people under the age of 18 is publicly available		
	Trust of personnel	Trust of Personnel & culture of Child Safety	M	M	Code of conduct for child safety Strategies implemented to embed a culture of safety for children and young people under the age of 18 Clear child safety reporting procedures		
	Recruitment of appropriate personnel	Trust of Personnel & culture of Child Safety	M	H	Recruitment & Induction Policy & processes Processes in place for Criminal history search (NCC), child safety (WWCC) and pre-employment reference checks		
	Engagement with children and young people under the age of 18 online	Avoidance of or appropriate engagement with children and young people under the age of 18 online	M	H	Code of Conduct for Child Safety Strategies implemented to embed a culture of child safety, including online aspects		