



Australian Government



ABORIGINAL
HOSTELS LIMITED

CHILD AND YOUNG PERSON SAFEGUARDING HANDBOOK

AHL Child Safeguarding Framework

DECEMBER 2025

ahl.gov.au



CULTURAL SAFETY: THE HEART OF OUR SAFEGUARDING

At Aboriginal Hostels Limited (AHL), safeguarding begins with cultural safety. We recognise that children and young people are only truly safe when they are also culturally safe – seen, respected and supported in their identity as First Nations peoples.

Cultural safety is the foundation of AHL's safeguarding framework. It acknowledges the enduring strength of culture, kin and Country as protective factors for children and young people, and it shapes how we create environments where children and young people can thrive.

This Handbook must be read and applied through this lens. Cultural safety is not an add-on – it is central to every standard, practice, process and responsibility outlined here.

AHL's commitments to cultural safety are expressed through 6 focus areas that guide our work every day:

Connection to culture, kin and Country – we prioritise cultural identity, kinship and connection to Country as protective factors that support wellbeing, healing and safety.

Participation and self-determination – we listen to and value the voices of children, young people and their families, and support them to lead decisions that affect their lives.

Community-led practice – we work alongside First Nations communities, Elders and cultural knowledge holders so that cultural authority and local priorities guide how safety and care are provided.

Culturally capable workforce – we expect all AHL People to demonstrate cultural respect and to take part in training, awareness, reflection and accountability that strengthens cultural capability across our workforce.

Safe environments and complaint pathways – we create culturally safe, inclusive and trauma-informed environments, and make sure children, young people and families have trusted and accessible ways to raise concerns.

Monitoring, evaluation and accountability – we review our practices, learn from feedback, and continually improve, to uphold cultural safety and the rights of children and young people.

By embedding these commitments, our safeguarding approach is not only compliant with national standards but also grounded in the cultural strengths and rights of First Nations children, young people, families and communities.

MESSAGE FROM THE CEO

It is important I preface this message with a sensitive topic disclaimer. Content within AHL's child safeguarding framework documents and training material may refer to matters that could be distressing or triggering for some. I urge you to engage with the materials sensitively and to seek support if required.

Our commitment:

At AHL, safeguarding children and young people is a shared responsibility and a core part of who we are. Every person connected to AHL, regardless of role, location or level of contact, plays a vital part in creating environments where children and young people feel safe in their surroundings, are protected by our practices and are empowered to grow strong in their identity, culture and community. Safeguarding is not the responsibility of a single team — it is the responsibility of us all.

Importantly, AHL has zero tolerance to child abuse, neglect or exploitation. Ensuring children and young people are protected, well cared for, supported and can thrive is our highest priority.

AHL is committed to providing an environment in which children and young people feel safe and are protected from any form of abuse, violence, injury, neglect or exploitation. AHL creates and maintains safe and nurturing environments, delivered through high quality care that supports children and young peoples' safety, development and wellbeing outcomes.

About this handbook:

This Safeguarding Handbook is a key resource for every AHL Person. It brings together our commitments, standards and practices into one accessible guide and outlines how we embed child safeguarding into our culture, operations and environments. It reflects our alignment with national and state safeguarding frameworks, and most importantly, it is grounded in the cultural strengths and rights of First Nations children and young people.

While some teams and roles will receive additional training and support tailored to their responsibilities, safeguarding is everyone's business. Whether you work directly with children and young people or you're in a corporate and enabling role that support AHL's services behind the scenes, your actions matter. The way you listen, the steps you take if something doesn't feel right, and how you build trust all play a critical role in keeping children and young people safe.

My commitment:

As CEO, I am committed to ensuring that safeguarding is embedded in everything we do, from leadership and governance to the day-to-day hostel operations. I ask each of you to read this handbook carefully, reflect on your role and take part in the training and conversations that will help us grow stronger, together.

Shane Hamilton PSM

Chief Executive Officer

This handbook applies to anyone who is employed by, or works at AHL including employees (ongoing, non-ongoing and casual), volunteers, senior leaders, Board directors, external providers/contractors and others acting on behalf of AHL or working within AHL physical and online environments. Our safeguarding approach applies to all activities in the organisation which involve, result in, or relate to contact with children and young people, whether on or off AHL grounds.

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2.0		11 December 2028	Scheduled review

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ACKNOWLEDGEMENTS

We gratefully acknowledge the invaluable contributions of the consultants and advisory groups who provided their expertise and guidance in the development of this Child and Young Person Safeguarding Handbook. Their deep understanding of child safeguarding principles, frameworks, standards and practices has helped make sure this handbook reflects the highest standards of child safety and wellbeing.

The development of this framework and handbook was informed by consultation with professionals across child protection and First Nations organisations whose insights supported the alignment of the policy with the **National Principles for Child Safe Organisations**, the **Commonwealth Child Safe Framework and relevant state and territory safeguarding standards**.

In particular, we wish to thank the following contributors:

[Social Vantage Advisory](#) — for subject matter expertise in safeguarding practices, processes and regulatory frameworks

[Wayarang](#) — for guidance on cultural safety, trauma-informed practice and engagement with First Nations communities and groups

We also acknowledge the lived experiences and voices of children, young people, families, and communities whose feedback continues to shape our safeguarding practices.

Several safeguarding resources and guides have helped shape this handbook, including — those from the National Office for Child Safety, Office for the Children’s Guardian (NSW), Commission for Children (VIC), Queensland Family and Child Commission (QLD), The Y’s safeguarding framework.



INTRODUCTION

WHY THIS HANDBOOK MATTERS

At AHL, safeguarding children and young people is a shared responsibility. It is not just a set of policies and procedures, it is a commitment to creating environments where children and young people feel safe, are safe, and are supported to thrive.

This handbook is a practical resource for all AHL People. It brings together our safeguarding policies, standards and practices into one accessible guide, and outlines how we embed child safeguarding into our culture, operations and environments. It reflects our alignment with national and state safeguarding frameworks, including the National Principles for Child Safe Organisations, the Commonwealth Child Safe Framework and relevant state and territory standards.

Importantly, this handbook is grounded in the cultural strengths and rights of First Nations children and young people. Cultural safety is not an optional extra — it is the foundation of our safeguarding approach. We honour the protective power of culture, kin and Country, and work alongside communities to make sure our services reflect and respect the identities of the children and young people we support.

Whether you work directly with children and young people or support our services behind the scenes, this handbook is for you. It is designed to guide your actions, strengthen your confidence and support a culture of safety, accountability and respect across all parts of AHL.

OUR COMMITMENT TO SAFEGUARDING CHILDREN AND YOUNG PEOPLE, AND CULTURAL WELLBEING

At AHL, safeguarding children and young people is a shared responsibility and a core part of who we are.

Every person connected to AHL, regardless of role, location, or level of contact, plays a vital part in creating environments where children and young people feel safe in their surroundings, are protected by our practices and are empowered to grow strong in their identity, culture and community. Safeguarding is not the responsibility of a single team; it is the responsibility of all AHL People.

Importantly, AHL has zero tolerance to child abuse, neglect or exploitation. Ensuring children and young people are protected, well cared for, supported and can thrive is our highest priority.

AHL is committed to providing an environment in which children and young people feel safe and are protected from any form of abuse, violence, injury, neglect or exploitation. AHL creates and maintains safe and nurturing environments, delivered through high quality care that supports children and young peoples' safety, development and wellbeing outcomes.

We take any action necessary to:

- create environments where children and young people's safety and wellbeing is at the centre of thought, values and actions
- place an emphasis on genuine engagement with, and valuing of children and young people
- create conditions that reduce the likelihood of harm to children and young people
- create conditions that increases the likelihood of identifying any harm
- swiftly respond to any concerns, disclosures, allegations or suspicions of harm.

We strive to provide places where children and young people:

- feel safe and are protected from any form of abuse, violence, injury, neglect or exploitation

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- are respected, valued and supported to reach their full potential
- are supported to grow strong in their identity, culture and connections.

For First Nations children and young people, safety and wellbeing are deeply connected to culture, identity, kinship, community and Country. That's why cultural safety and healing-informed practice are embedded in everything we do — from our policies and procedures to our daily interactions.

We actively listen to children and young people, elevate their voices, and create opportunities for them to shape the services and environments that affect them. Their perspectives are not only welcomed, but they are also essential to how we design, deliver and improve our work.



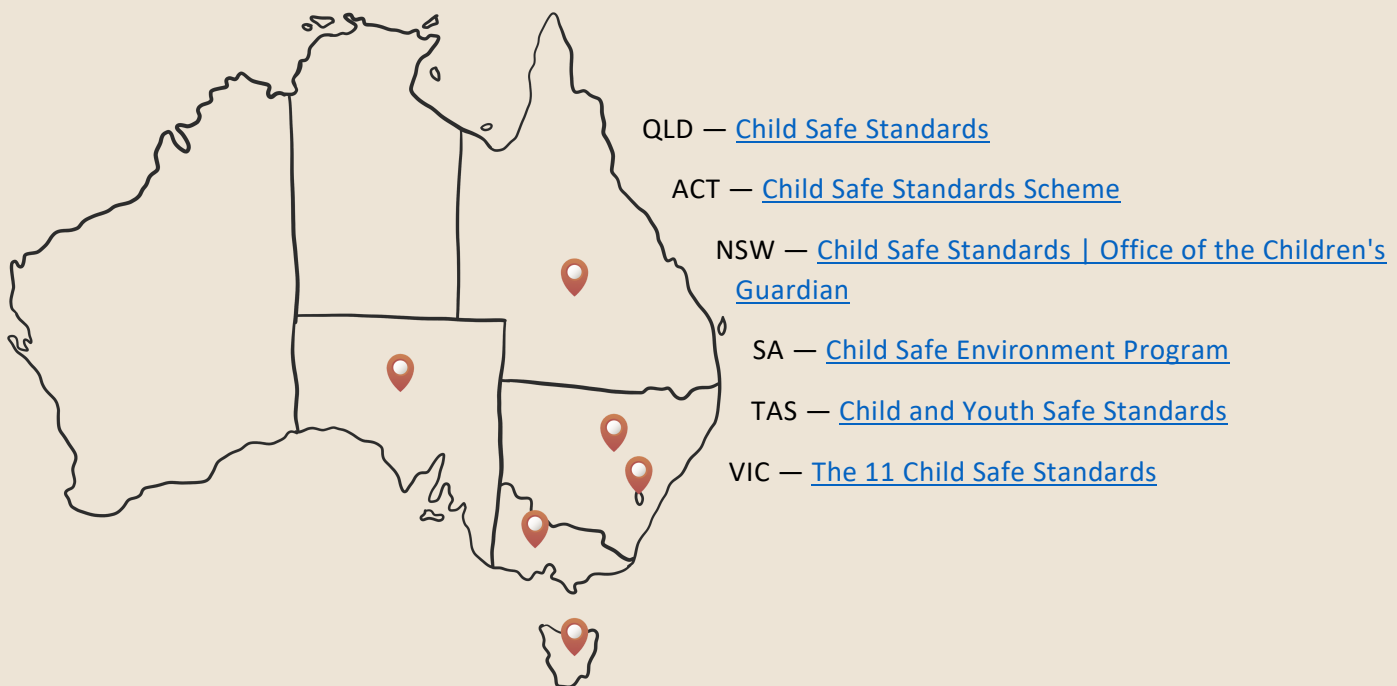
AHL's safeguarding approach is guided by nationally recognised principles and standards that set clear expectations for organisations working with children and young people. It is important to note that child safeguarding (proactive, preventative approach) differs to child protection (reactive and responsive). For information about Child Protection, refer to the Child Protection (Mandatory Reporting) Policy for more information.

National approaches to *child safeguarding*:

- [Commonwealth Child Safe Framework](#)
- [National Principles for Child Safe Organisations](#)

In addition to the national approaches, some state and territories have legislated child safe standards:

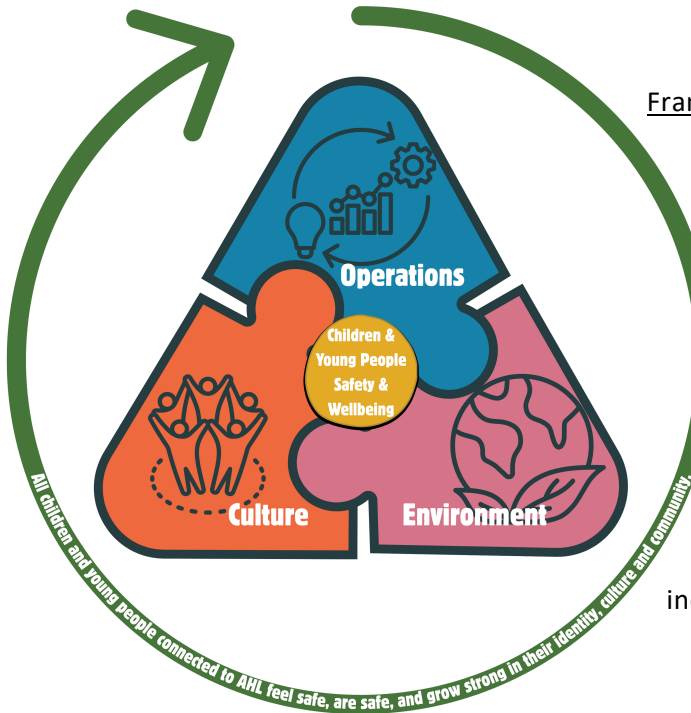
Note: Western Australia and the Northern Territory have not yet legislated Child Safe Standards, however have committed to implementing the National Principles for Child Safe Organisation.



Note: this is not a map of AHL's hostels. It represents the states and territories that have legislated child safe standards.

INTRODUCING THE AHL SAFEGUARDING FRAMEWORK

To guide our efforts, we have developed a Child Safeguarding Framework that makes sure all children and young people are, and feel, safe in our environments and hostels, in their families and in their communities.



Framework Pillars

Safe and caring culture built on leadership, governance and values that empowers children and young people and places their needs at the centre of decision-making

Safe operations to ensure AHL People have the right policies, processes and practices to keep children and young people safe, and fulfill their safeguarding responsibilities with confidence

Safe and inclusive environments which makes every AHL space child-focused, culturally safe and inclusive, so children and young people can thrive.

Vision Statement

All children and young people connected to AHL feel safe, are safe, and grow strong in their identity, culture and community.

We strive to be a child-safe, child-friendly and culturally safe organisation where every child and young person is respected, heard and empowered. Our safeguarding approach is grounded in cultural safety, child rights and community-led practice, and is embedded in everything we do.

Design Principles

AHL's safeguarding approach is developed in line with the following principles. These guide our decisions, behaviours and responsibilities to make sure children and young people are safe, respected and empowered in all aspects of our work.



Child Centred — we prioritise the rights, needs and voices of children and young people in everything we do. Their safety and wellbeing come first.



Culturally Safe — we uphold the cultural identity, dignity and belonging of First Nations children and young people. Cultural safety is non-negotiable.



Prevention-Focused — we act early to prevent harm and create environments that reduce risk and promote healing, inclusion and safety.



Participation-Driven — we actively listen to children and young people and support their meaningful involvement in decisions that affect them.



Inclusive and Equitable — we embrace diversity and make sure that all children and young people, regardless of background, ability or identity, feel safe, valued and supported.



Accountable and Transparent — we take responsibility for our actions, respond to concerns with integrity and continually improve our safeguarding practices.



Collaborative and Community-Led — we work in partnership with families, communities, Elders and cultural knowledge holders to make sure safeguarding practice is shaped by those it affects most.



Trauma-Informed — we recognise the impact of trauma and create environments that are physically, emotionally and culturally safe, and that support healing and empowerment.

Using This Handbook

This handbook is organised into three (3) core chapters— **Culture, Operations and Environment** — each reflecting a key component of our Safeguarding Framework. These chapters include practical guidance, reflection questions, indicators of success and helpful links to support implementation.

It sets out our strong commitment to safeguarding practices that promote the safety and wellbeing of children and young people in our services. It is our overarching safeguarding document that brings to life our:

- Commitment to Safeguarding Children and Young People
- Child and Young Person Safeguarding Policy
- Child and Young Person Safeguarding Behavioural Standards

It also reflects AHL's alignment with the Closing the Gap Priority Reforms including:

- Working in genuine partnership with First Nations people
- Valuing community-led approaches
- Strengthening culturally capable, responsive systems of care across our hostels and services.

This handbook is not just a reference, it is a tool for reflection, action and accountability. Whether you are reading it for the first time or returning to it for guidance, we encourage you to use it actively — in

team discussions, supervision, training, planning and everyday decision-making. By using this handbook as a living resource — one that informs your decisions, strengthens your practice and supports continuous learning — you are helping build a safer, more culturally grounded environment for every child and young person connected to AHL.

UNDERSTANDING KEY TERMS

Before diving into the details of our safeguarding approach, it is important that we share a common understanding of the language we use. Safeguarding is a complex area, and clarity around key terms helps ensure consistency, confidence and shared responsibility across all roles at AHL. This section defines the core concepts and terminology used throughout the handbook, so that everyone, regardless of their position or experience, can engage in safeguarding in a clear, informed and culturally respectful way.

First Nations peoples — We respectfully use the collective term “First Nations peoples” to acknowledge the diversity of First Nations peoples and cultures across Australia. Where possible, and when known, AHL seeks to use specific nation, language group or community names in recognition of local cultural authority.

AHL People/Person — All individuals who work for or represent AHL, including employees (permanent, temporary and casual), volunteers, contractors, Board members and others acting on behalf of AHL.

Child Protection — A specific aspect of safeguarding that focuses on identifying, responding to and reporting abuse, neglect or exploitation. It includes legal obligations such as mandatory reporting and compliance with child protection laws.

Child Safe Organisation — An organisation that puts the best interests of children and young people first, actively works to prevent harm, and responds appropriately to concerns or disclosures.

Child-focussed — An approach that prioritises the rights, needs and voices of children and young people in all decisions, actions and environments.

Children and young people — Any individual under the age of 18. This includes infants, toddlers, children and adolescents. AHL recognises and supports their diverse identities, experiences and rights.

Complaint — A formal or informal expression of dissatisfaction or concern raised by a child, young person, family member, staff or community member about a service, behaviour or decision.

Cultural Safety — An environment that is safe for First Nations children and young people, where there is no challenge or denial of their identity, culture or experience. It includes respect, recognition and support for culture strengths, kinship and connection to Country.

Empowerment — Supporting children and young people to understand their rights, express their views, make choices and participate meaningfully in decisions that affect them.

Families and communities — We recognise that family and community structures differ across cultures and contexts. In this handbook, “families and communities” includes parents, carers, kin, Elders, extended family and community members who play a role in supporting children and young people’s safety and wellbeing.

Mandatory Reporting — The legal obligation of certain professionals and workers to report suspected child abuse or neglect to relevant authorities.

Reportable Conduct — Allegations or incidents involving child-related misconduct (for example sexual offences, physical assault) that must be reported to a designated oversight body under state or territory legislation.

Safeguarding — The proactive and ongoing actions taken to promote the safety, wellbeing and rights of children and young people. It includes preventing harm, responding to concerns, creating safe environments and empowering children and young people to participate in decisions that affect them.

Safeguarding Concern — Any issue, behaviour or situation that may pose a risk to the safety or wellbeing of a child or young person, including breaches of safeguarding standards or inappropriate conduct.

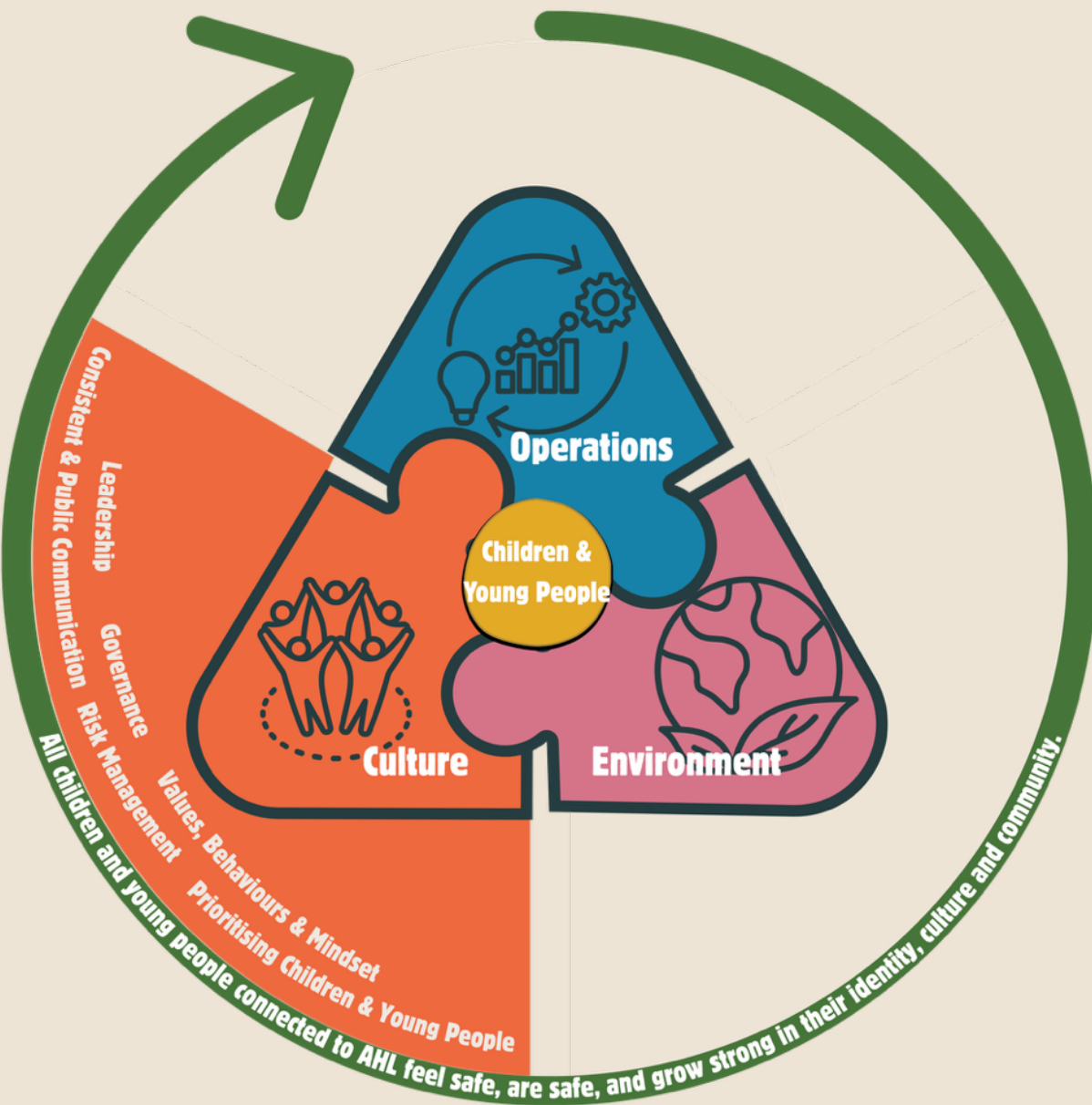
Safeguarding Framework — AHL's overarching structure that guides how we keep children and young people safe. It brings together our values, policies, practices and environments, and is built around three core components — Culture, Operations and Environment.

Trauma-Informed Practice — An approach that recognises the impact of trauma on children and young people and seeks to create environments that are physically, emotionally and culturally safe, and that support healing and empowerment.

What every AHL Person needs to know:

- **Safeguarding is everyone's responsibility – regardless of role, location or level of contact**
- **All AHL People must understand and follow the Child and Young Person Safeguarding Policy and Behavioural Standards**
- **Cultural Safety is non-negotiable. Respect, inclusion and connection to culture must be embedded in daily practice**
- **Mandatory reporting obligations must be understood and acted on without delay**
- **Concerns, complaints or disclosures must be taken seriously and responded to appropriately**
- **Participation, empowerment and listening to children and young people are key to keeping them safe**
- **Safeguarding practices must be trauma-informed, culturally safe and continuously improved**

CULTURE



Culture is the foundation of safeguarding at AHL. It shapes how we think, behave and make decisions. A strong safeguarding culture makes sure that children and young people are not only protected from harm, but also respected, empowered and supported to thrive, especially in ways that honour their identity, community and culture.

SAFEGUARDING CULTURE AT AHL

At AHL, our values are more than words on a page — they shape how way we work, how we relate to one another, and how we create safe spaces for children and young people. The attitudes, behaviours and everyday actions of AHL People form the foundation of our safeguarding environment.

A strong, positive culture empowers people to speak up if something doesn't feel right and makes sure everyone understands what is expected of them. It is through this shared mindset and practice that safeguarding becomes real: not just compliance. It is safeguarding capability, competency and real-life practice that protects children and young people and strengthens their wellbeing.

Creating and sustaining safeguarding culture and safe environment requires genuine leadership and accountability at every level. Leaders have a responsibility to champion child-safe values, principles and practices, and to embed them in governance and daily decision-making. At the same time, all AHL People share responsibility for making sure children and young people are safe, and feel safe, regardless of role, location or level of contact.

Safeguarding goes beyond reacting and responding to harm; it is about proactively preventing it and building environments where children and young people feel respected, valued, and able to reach their full potential. For First Nations children and young people, this means recognising that safety and wellbeing are deeply connected to culture, identity, kinship, community and Country.

Child safeguarding at AHL is everybody's business. By taking a top-down and bottom-up approach — with leadership at all levels — we make sure the safety and best interests of children and young people are prioritised across our organisation, in every space and in every decision.

Key Concepts:

Safeguarding Culture – AHL's culture is the foundation of child safeguarding. It's built on shared values, behaviours and mindsets that prioritise the safety and wellbeing of children and young people.

Cultural Safety – Cultural Safety means Aboriginal and Torres Strait Islander children and young people feel safe, respected and supported in their identity, kinship and connection to Country. It is central – not optional.

Child-Centred Practice – Children and young people are at the heart of all decisions. Their rights, voices and best interests guide our actions.

Leadership at All Levels – Everyone at AHL is a leader in safeguarding. Leadership is demonstrated through modelling safe behaviour, listening and taking action.

Values-Driven Behaviour – AHL's P.R.O.U.D. values shape how we interact with children, families and each other. These values are embedded in our behavioural standards and expectations.

Safeguarding Mindset – AHL People are expected to be proactive, reflective, courageous and collaborative. We anticipate risks, challenge unsafe practices and continuously learn.

Guiding Principles

These principles guide how we embed safeguarding into our culture. They are not just ideals, they are practical commitments that shape our everyday actions.



Safety is Everyone's Responsibility — all AHL People, regardless of role, have a duty to keep children and young people safe.



Culture Shapes Practice — a strong safeguarding culture empowers people to speak up, act early and uphold high standards.



Respect and Inclusion Matter — we create environments where children and young people feel seen, heard and valued.



Leadership Must Be Visible — leaders must model safeguarding values and make sure safety and wellbeing is embedded in governance, decision-making and daily operations.



Continuous Improvement is Essential — we reflect, learn and adapt to strengthen our safeguarding practice and culture over time.

What good culture looks like

A strong safeguarding culture is visible, lived and felt across all parts of AHL. Here is what it looks like in practice:

- Children and young people feel safe, respected and empowered in every interaction
- AHL People speak up early when something doesn't feel right, and are supported when they do.
- Cultural safety is embedded, not optional. Aboriginal and Torres Strait Islander identity, kinship and Country are honoured in daily practice.
- Leadership is visible and accountable, modelling safeguarding values and behaviours.
- Policies and procedures are understood and followed, not just filed away.
- Feedback is welcomed and acted on, especially from children, young people, families and communities.
- Safeguarding is part of everyday conversations, not just compliance checklists.
- Poor practice is challenged respectfully, and improvement is continuous.

INTRODUCING THE CULTURE COMPONENTS

A strong safeguarding culture is built on more than values, it is built on action. In this chapter we explore the core elements that shape AHL's safeguarding culture and bring it to life across our organisation. These elements are interconnected and essential to creating environments where children and young people feel safe, are safe and grow strong in their identity, culture and community.

Prioritising children and young people

All children and young people have the right to feel and be safe, happy, empowered, and participate in decisions or processes that affect them. We care about children and young people and helping them lead active and fulfilled roles within our community.

We believe that children and young people are unique and diverse, and we seek to support and empower them. To us, an empowered child or young person feels in control of their life — they are confident in their ability to contribute to the world around them; they overcome challenges and realise their potential.

For First Nations children and young people, safety and wellbeing are inseparable from culture, identity, kinship, community and Country. AHL is committed to creating culturally safe and healing-informed environments where children and young people feel strong in who they are, supported in their growth, and respected in their rights.

Children, like adults, have human rights — and this includes being safe. The main international agreement on children's rights is the United Nations [Convention on the Rights of the Child](#) (CRC). As a party to the CRC, Australia has a duty to make sure that all children and young people in Australia enjoy the rights set out in the agreement.

Importantly, AHL has zero tolerance to child abuse, neglect or exploitation. Making sure children and young people are protected, well cared for, supported and can thrive is our top priority. We take any action necessary to enable all children and young people to feel and be safe, and to safeguard them from sexual, physical, and emotional or psychological abuse, as well as exposure to violence, harm and neglect.

AHL is committed to creating and proactively maintaining environments that aim to prevent and deter any actions and omissions, whether deliberate or inadvertent, that place children and young people at risk of any kind of abuse or harm.

It is the responsibility of all AHL People to play their part in helping children and young people to feel and be safe. This includes adhering to, promoting and modelling behaviour and practice in accordance with AHL's:

- Commitment statement (published each year in the Annual Report)
- Child and Young Person Safeguarding Policy
- Child and Young Person Safeguarding Behavioural Standards
- Child Protection (Mandatory Reporting) Policy.

This is more than just meeting compliance responsibilities. We are committed to amplifying and promoting the voices and rights of children and young people, through the prevention, identification and response to child abuse, neglect, and harm in ways that are culturally safe, inclusive and responsive.

Example: Supporting Participation and Wellbeing

A young person staying at an AHL hostel shares that they feel disconnected from their community and unsure about who to talk to when they are feeling down. In response, the hostel team:

- Listen without judgement, validating the young person's feelings and thanking them for speaking up.
- Invites the young person to help co-design a weekly wellbeing activity, such as a yarnning circle or cultural cooking night, where they and their peers can connect and share stories .
- Engages a local Elder to support the activity and provide cultural grounding and mentorship.
- Creates a feedback loop, checking in regularly with the young people and their peers to see how the activity is going and what could be improved.
- Displays a "You Said, We Did" board in the common area to show how young people's voices are shaping the hostel environment.

This approach not only supports the young person's wellbeing but also empowers them and their peers to take ownership of their space and feel heard, valued and culturally safe.

Values, behaviours and mindset

At AHL we actively promote children and young people's safety and wellbeing in everything we do, no matter what our role is. Together we provide an environment and opportunities in which children and young people feel and are respected, valued and encouraged to reach their full potential. Our values and behaviours are foundational to this, and guide how we put children and young people first. At the heart of our approach is:

- the best interests of children and young people and their protection from harm is paramount
- child abuse, neglect and exploitation are not tolerated and our policies and procedures helps prevent harm from happening
- we understand and respect the rights of children and young people
- concerns about child safety raised by children and their parents and carers are acted on
- reporting abuse is not obstructed or prevented.

AHL Values

These are the core beliefs that guide how we feel, behave and act. At AHL it is expected that everyone displays our P.R.O.U.D. values in their everyday working relationships and interactions with children and young people, families, communities and other AHL People.



Australian Public Service Values

- **Impartial** — the APS is apolitical and provides the government with advice that is frank, honest, timely and based on the best available evidence.
- **Committed to service** — the APS is professional, objective, innovative and efficient, and works collaboratively to achieve the best results for the Australian community and the government.
- **Accountable** — the APS is open and accountable to the Australian community under the law and within the framework of Ministerial responsibility.
- **Respectful** — the APS respects all people, including their rights and their heritage.
- **Ethical** — the APS demonstrates leadership, is trustworthy, and acts with integrity, in all that it does.
- **Stewardship** — the APS builds its capability and institutional knowledge, and supports the public interest now and into the future, by understanding the long-term impacts of what it does.

Australian Public Service Code of Conduct

Employees of the Australian Public Service occupy a position of trust. They are entrusted by the Government and the community to undertake important work on their behalf. With this trust comes a high level of responsibility which should be matched by the highest standards of ethical behaviour from each APS employee.

For more information, refer to the [APS Values and Code of Conduct in practice](#) and in particular, [relationships in the workplace](#) and [relationships with the public](#).

Behaviours

These are the actions, what we do to turn our values into reality and hold us accountable to modeling and enforcing safeguarding. These values underpin our behaviours and build our culture at AHL — it is part of who we, what we do and what we stand for. These values, and in turn our behaviours guide everything we do at AHL and are embedded in our policies, procedures and practices to ensure we are all accountable to our actions.

In addition to the Australian Public Service Values and Code of Conduct, AHL has Child and Young Person Safeguarding Behaviour Standards that reflect these values and embeds our safeguarding commitment. This includes:

- acting in the best interests of children and young people
- promoting equity, inclusion and cultural safety
- establishing safe online digital engagement
- modelling respectful and protective behaviour
- identifying, reporting and responding to concerns
- upholding confidentiality and information privacy
- supporting child and young person participation and feedback
- participating in continuous learning and reflection
- championing a child safeguarding culture.

Our Child and Young Person Safeguarding Behavioral Standards clearly detail acceptable and unacceptable behaviour and expectations of all AHL People. AHL People receive a copy of the Child and Young Person Safeguarding Behavioural Standards and must uphold these standards at all times (see *'Helpful links and resources'* for links to AHL related policies and materials).

Mindset — this is our underlying way of thinking that supports sustainable safeguarding efforts. Our safeguarding mindset is:

- **Proactive, Not Reactive** — anticipating risks and acting early, rather than waiting for harm to occur.
- **Reflective and Self-Aware** — willingness to examine our own biases, behaviours, and areas for growth.
- **Growth-Oriented** — open to new knowledge, evidence-informed practice, and continuous development.
- **Courageous and Decisive** — willing to make tough decisions, challenge unsafe practices, and stand up for children.
- **Systemic Thinking** — recognising that safeguarding is not just about individuals but also systems, cultures, and policies.
- **Collaborative** — valuing partnerships with children, families, communities, colleagues and other organisations to strengthen safety.
- **Risk-Aware but Not Fearful** — understanding risks realistically and acting wisely, without becoming paralysed by fear.

Example: Living the Values, Behaviours and Mindsets

During a team meeting, a staff member raises a concern about how a young person was spoken to by another colleague. Instead of dismissing the concern, the team leader:

- Thanks the staff member for speaking up, reinforcing that safety is everyone's responsibility.
- Reflects on the situation with the team, using it as a learning opportunity to revisit AHL's Behavioural Standards.
- Encourages open discussion, asking how the team can better model respectful communication.
- Follows up with the colleague involved, offering support and guidance to strengthen their practice.
- Documents the reflection and shares it with leadership, showing a commitment to transparency and continuous improvement.

This example shows how values (respect, accountability), behaviours (speaking up, listening) and mindset (reflective, growth-oriented) work together to build a strong safeguarding culture.

Leadership

At AHL, our goal is to keep children and young people safe at all times. Policies and procedures are important, but long-term change only happens when there is genuine commitment to driving a safeguarding culture across the organisation.

Our commitment to safeguarding is embedded across all levels and roles at AHL. We are all leaders in protecting children and young people and creating child safe environments, regardless of your position or power within our organisation. Leadership at AHL means modelling the values, behaviours and mindset

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expected of all AHL People, including a commitment to cultural safety, listening to children and young people, and taking action when concerns arise.

We value shared and collective notions of leadership. This means leadership is not limited to those with formal authority, but is demonstrated whenever AHL People act with purpose, openness to diverse perspectives, and a willingness to challenge and empower others.

Poor leadership increases the chances that things can go wrong. In these cases, systems meant to protect children and young people can fail. When the safety and wellbeing of children and young people are not prioritised and monitored, the likelihood of abuse increases. This can happen when:

- allegations of harm are not reported
- adults are automatically believed over children
- leaders prefer to protect the reputation of their organisation or their colleagues
- leaders deny the allegation could have happened because of preconceived ideas about a person's character.

Good leaders at AHL:

- make sure there are clear rules and procedures
- make sure AHL People know what is expected of them
- identify and mitigate risk
- listen to children, young people and families, and consider diverse needs
- continually find things to improve
- act as role models in prioritising the safety and wellbeing of children and young people, including their cultural safety

- reinforce AHL’s safeguarding commitment at every level of AHL — this can be reflected in the kind of people they hire; the behaviour they reward, support and discipline; the matters they focus their attention on; and the way they respond to challenging events.

Keeping children and young people safe in any organisation must have genuine buy-in and commitment from its leaders — at AHL this begins with our Board. Ensuring safeguarding children and young people is a standing Board, Executive and Senior Management agenda item is essential to keeping safeguarding children and young people front of mind and regularly communicated.

More than this though, safeguarding children and young people is about actions, not just words. Our leadership at AHL needs to live our values and behaviours and role model behaviours for all AHL People, children, young people, families and the community. This shows that safeguarding is embedded and reflected in our culture and is demonstrated by the values and actions of all AHL People.

At AHL we strive for and uphold a culture where all AHL People understand and live by their shared responsibility to safeguarding children and young people. Whilst we know that safeguarding children and young people is a shared responsibility, it is the management and Executive Leadership of AHL who must make sure it is at the heart of what we do and how we operate.

We are also committed to removing all barriers to reporting safeguarding matters. Our leaders need to be talking to AHL People about what may prevent them from speaking up and look at ways to empower them. This can happen during one-on-one supervision sessions, team meetings or through employee engagement strategies such as surveys.

Questions that can help us ask and reflect on what we are doing as leaders:

- How do we champion child safeguarding culture at AHL and the work that we do?
- How do we role model AHL’s safeguarding values in all our decisions and actions?
- How do we demonstrate cultural safety in the way we listen to and respect children, young people, families and communities?
- In what ways do we encourage all AHL People to take ownership of safeguarding, not just rely on managers and senior leadership?
- How do we check that policies and procedures are not just in place, but actively followed in practice?
- How do we recognise, support and celebrate AHL People who demonstrate safeguarding behaviours?
- How do we clearly communicate to AHL People what safe behaviour with children and young people looks like, and what is unacceptable?
- How do we ensure we have effective child safeguarding risk management strategies?
- How do we set expectations of how our colleagues and AHL People behave towards children and young people?
- How do we share the responsibility of keeping children and young people safe?
- What activities, programs, services, systems and processes exist to reinforce our child safe culture?

Example: Leadership in Action

During a routine team meeting, a hostel manager notices that staff are unsure about how to respond to disclosures from young people. Instead of waiting for an issue to arise, the manager:

- Initiates a reflective discussion, inviting staff to share their experiences and questions about responding to disclosures.
- Revisits AHL’s Behavioural Standards and Mandatory Reporting Policy, making sure everyone understands their responsibilities.
- Organises a refresher training session, co-facilitated by a cultural advisor and safeguarding expert.
- Models’ transparency and accountability, sharing how leadership will support staff in future safeguarding situations.
- Follows up individually, checking in with staff to build confidence and address any concerns.

This proactive and inclusive approach demonstrates leadership that is visible, culturally safe and committed to continuous improvement, setting the tone for a strong safeguarding culture.

Consistent and public communication

At AHL, our commitment to safeguarding children and young people is expressed through our publicly available Children and Young People Safeguarding Policy and our Child and Young Person Safeguarding Behavioural Standards. We also state our commitment in our Annual Reports.,

Consistent safeguarding messaging about our commitment, expectations and responsibilities should be embedded into our communication materials, policies, procedures and resources (both internal and external to AHL). For example, recruitment advertisements, position descriptions, and training materials. Additionally, regular promotion of AHL's commitment to safeguarding children and young people should be done in a variety of ways. For example, at the reception area of hostels and offices, in newsletters, and on the website.

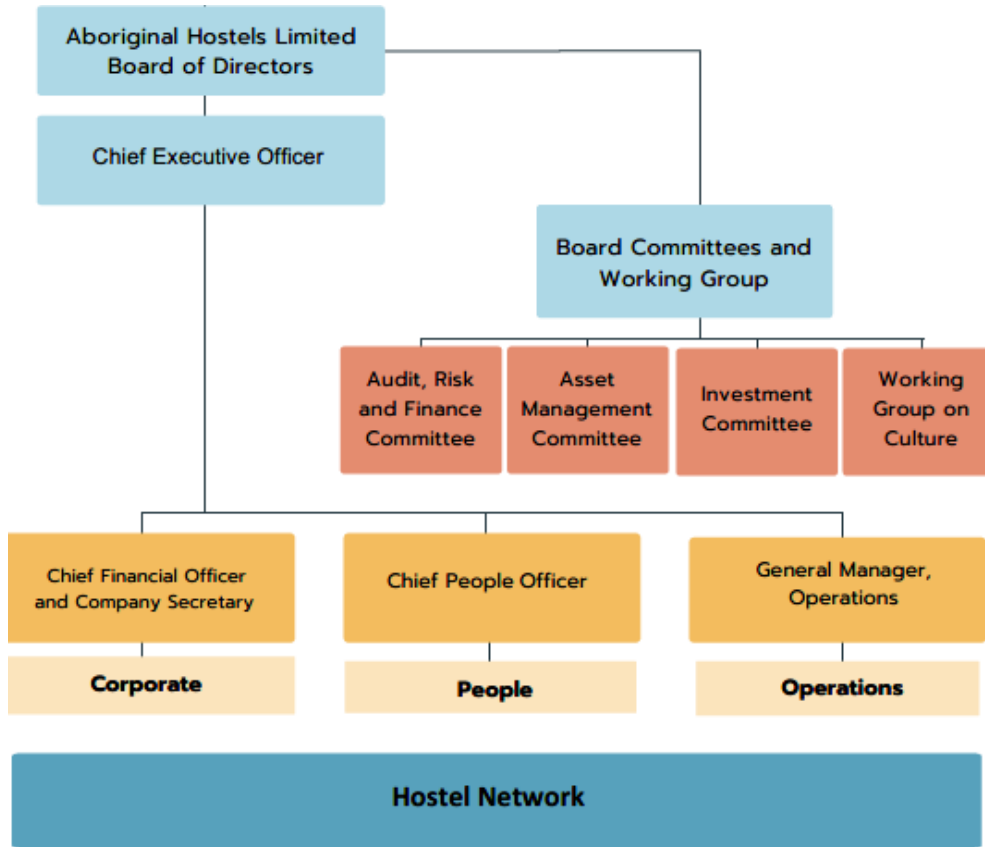
There should also be opportunities for open and transparent communication and feedback when it comes to safeguarding children and young people, and it is the leaders of AHL who must facilitate this and ensure our culture allows this to occur. This is our journey, we will continually review and improve to meet our requirements and most importantly, keep our children, young people safe.

Governance

Governance includes all processes and frameworks used by an organisation to ensure accountability in its decision-making and operations. This includes a variety of business areas and functions including committees, policies and procedures, risk management, business planning as well as leadership and culture. At AHL, it is important that safeguarding risks and opportunities are considered at all levels of decision-making.

Our safeguarding governance structure supports AHL to assign clear accountability and embed responsibilities across our teams, operations, committees, executive leadership and the Board. It includes the structure of decision-making and oversight within AHL — such as the Board, CEO, Sub-Committees, Executive Team, and other managers and supervisors. AHL's organisational structure is pictured below:

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Safeguarding should be at the forefront of everyone's mind and reflected in how we plan and report on strategic objectives, projects, and any issues, concerns or opportunities that arise. Our safeguarding activities, progress, concerns and opportunities should be a standing agenda item for all regular meetings (e.g. team/staff meetings, Executive meetings, Board meetings, committee/project meetings, and supervision). Additionally, our efforts towards progressing and maintaining our safeguarding commitment and approach should be communicated to, and overseen by, the Executive Leadership Team and the Board (e.g. included in Board and Executive team briefing documents, Annual Commitment Statement to Child Safety). Our commitment and approach to safeguarding should also be reflected in our strategic objectives, goals and priority areas.

Example: Governance in Practice

AHL is preparing its quarterly report to the Board. As part of its safeguarding governance responsibilities, the Executive Leadership Team ensures:

- Safeguarding is a standing agenda item at Board and Executive meetings, with updates on incidents, training, complaints and continuous improvement activities .
- A safeguarding dashboard is presented, showing trends in feedback, risk assessments and staff training completion rates.
- Input from the First Nations Reference Group is included, highlighting cultural safety priorities and community-led recommendations.
- AHL's safeguarding commitments are reflected in strategic planning, with clear objectives linked to child safety, cultural wellbeing and accountability.
- Follow-up actions are tracked and reported, ensuring transparency and continuous improvement across all levels of leadership.

This example shows how governance structures at AHL embed safeguarding into decision-making, oversight and strategic direction, making child safety a visible and accountable priority.

Risk management

AHL is committed to proactively identifying, assessing, and mitigating risks to the safety and wellbeing of children and young people across all our hostels, services and physical and online environments. We recognise that risks to children and young people can arise from physical spaces, online platforms, people, and poor organisational culture. We know that if risks are not managed, harm can occur. That's why risk management is built into our governance, operations, and daily practice.

We are building a risk aware culture where all AHL People take responsibility for the safety and wellbeing of children and young people. This means risk awareness isn't a one-off task, it is part of everyday practice. This includes:

- empowering children and young people to speak up about situations where they feel uncomfortable or unsafe
- encouraging AHL People to identify and act on risks early
- holding managers and senior leadership accountable for leading and modelling good risk management and governance.

Our child and young person-centred risk management process includes:

- **risk identification** — we systematically identify risks of harm to children and young people in all contexts, including:

- accommodation settings
 - supervision and care arrangements
 - transportation
 - online communication
 - third-party partnerships and programs.
- **risk assessment** — all identified risks are assessed for their likelihood and potential impact, with priority given to risks involving:
 - inadequate supervision
 - unscreened personnel
 - inappropriate physical or online contact
 - practices that disregard or breach cultural protocols and safety standards
 - power imbalances or grooming behaviour.
 - **risk mitigation and controls** — we implement proportionate control measures to prevent or reduce the risk of harm, including but not limited to:
 - working with children checks, national police clearances and identify verification
 - mandatory training in safeguarding policies, procedures, practices and requirements, child protection, trauma-informed practice, and cultural safety
 - supervision protocols and staff-to-child ratios
 - child-friendly complaint and feedback pathways
 - physical and online environment design that reduces opportunities for isolation or exploitation
 - cultural advisors consulted on risks to First Nations children and young people.
 - **monitoring and review** — risk assessments are regularly reviewed, including:
 - at least annually or when significant changes occur (e.g., new programs, changes to facilities)
 - after any incident or near miss involving children or young people
 - as part of continuous quality improvement and internal audit processes.
 - **reporting and escalation** — we have mechanisms in place to enable regularly reporting on safeguarding to the AHL Board and Executive and escalate matters as required, including:

How we know we're doing it well:

- Child safeguarding is embedded in day-to-day practices.
- Leaders demonstrate respect for cultural protocols (e.g. involving Elders, acknowledging Country, embedding cultural guidance in practice).
- AHL People follow our Child and Young Person Safeguarding Behavioural Standards and safeguarding policies, procedures and practices.
- AHL People, children, young people, and families report that they see leaders modelling safeguarding and cultural safety values.
- Decision-making prioritises children and young people
- Our culture creates an environment where it is difficult for abuse to occur.
- AHL People appropriately respond to and report child abuse
- AHL People, children, young people, families and communities can clearly describe what safe and unsafe behaviours look like and where to raise concerns.
- Children and young people feel safer knowing they have input into the organisation.
- AHL People feel confident to identify, report, mitigate and manage risks.
- Risk registers include safeguarding risks and are updated and acted upon.
- Risk reviews and audits show improvement over time.
- Safeguarding procedures are consistently followed and breaches are addressed.
- Children, young people, families, communities and AHL People know how to report concerns - and reports are made and responded to appropriately.
- Instances of unsafe behaviour are consistently challenged and addressed.
- AHL People feel safe to raise concerns, including about senior colleagues.
- Safeguarding and cultural safety are standing agenda items in supervision, team meetings and Board/Executive meetings.

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- any emerging or identified risk that may result in harm to a child or young person is immediately escalated to management and addressed according to our incident management and reporting procedures
- all AHL People are required to report concerns or breaches without delay
- Board and Executive reports about safeguarding needs, issues and concerns are completed and tabled at every Board and Executive meeting.

Example: Risk Management in Action

During a routine hostel walkthrough, a team member notices that a quiet corner near the laundry is poorly lit and not easily visible from common areas. They:

- Raise the concern with their manager, noting that the space could pose a risk for unsupervised interactions.
- Conduct a quick risk assessment, considering the visibility, supervision and access.
- Implement immediate changes, including improved lighting and signage and update supervision protocols.
- Consult with young people, asking how the space feels and what would help them feel safer.
- Document the action and share it during the next team meetings, reinforcing a culture of proactive risk management.

This example shows how everyday awareness, responsive action and continuous improvement help AHL maintain safe, inclusive and culturally respectful environments.

HELPFUL LINKS AND RESOURCES

Risk Management

Office for the Children's Guardian (NSW) — [Resources | Risk management and the Child Safe Standards part 1: Responding to risk | Office of the Children's Guardian](#)

Commission for Children and Young People (Vic) — [Risk-assessment-and-management-templates.docx](#)

Related AHL documents and resources

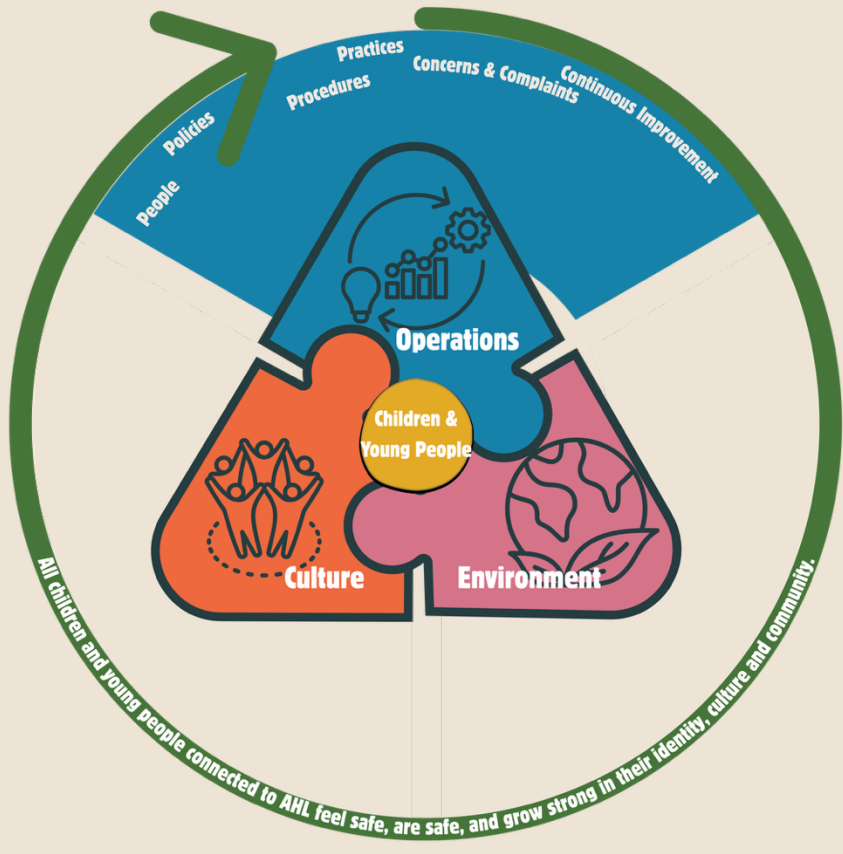
Child and Young Person Safeguarding Behavioural Standards

Child and Young Person Safeguarding Policy

Child Protection (Mandatory Reporting) Policy

AHL Code of Conduct

OPERATIONS



OPERATIONS: TURNING CULTURE INTO PRACTICE

Safeguarding operations are the practical things an organisation does every day to make sure children and young people are safe, supported, and treated with respect. It's about turning policies and rules into real actions — like creating safe spaces, knowing how to spot risks, responding if a child or young person speaks up, and always putting children and young people's wellbeing first.

For AHL People, understanding safeguarding is essential because you are often the people children and young people interact with most. The way you listen, the steps you take if something doesn't feel right, and how you build trust all play a big role in keeping children and young people safe.

By being clear on safeguarding operations, we help protect children from harm, support AHL People, and make sure we are living up to our duty of care as well as our commitment to keeping children and young people safe. Most importantly, it makes sure children and young people feel safe, valued, and able to thrive in our care.

This chapter covers the practical things we do to keep children and young people safe across AHL. This includes the people we hire, policies, procedures and practices as well as what to do if something goes wrong. We cover some day-to-day aspects of what we do to keep children and young people safe, and things to consider when performing these operations.

Guiding Principles

These principles guide how we embed safeguarding into our operations. They are not just ideals, they are practical commitments that shape our everyday actions.



Clarity and Consistency — Safeguarding policies and procedures must be clear, practical and consistently applied across all teams and services.



Prevention and Early Action — Operations should focus on identifying risks early and acting to prevent harm before it occurs.



Training and Support — All AHL People must receive role-relevant training, supervision and support to understand and fulfill their safeguarding responsibilities.



Transparency and Accessibility — Safeguarding information must be easy to find, understand and use — for staff, children, young people and families.



Continuous Improvement — Operational systems must be regularly reviewed, updated and improved based on feedback, incidents and emerging risks.



Cultural Safety Embedded in Practice — Every operational decision and process must uphold the cultural safety of First Nations children and young people.

Bringing Safeguarding to Life: Core Operational Elements

Safeguarding at AHL is not just about having the right values, it is about embedding those values into everyday systems, decisions and behaviours. The following section outlines the core operational components that make sure safeguarding is consistently applied across all roles, services and environments. These elements help AHL People act with confidence, clarity and cultural safety in every situation.

People — The people who work at AHL are central to safeguarding. This section outlines how we recruit, support and develop a workforce that is safe, suitable and culturally capable, because policies alone do not protect children and young people, people do.

Legislation, policy, procedures and practice — Safeguarding is grounded in law, guided by policy, implemented through procedures and lived through practice. This section explains how these layers work together to create a consistent, accountable and culturally respectful safeguarding system.

Record keeping, data management, privacy — Accurate, secure and respectful record keeping is essential to safeguarding. This section outlines how AHL manages sensitive information to protect children and young people, meet legal obligations and uphold cultural protocols.

Concerns, complaints and reporting — Speaking up is a vital part of safeguarding. This section explains how AHL supports children, young people, families and staff to raise concerns safely, and how we respond with integrity, transparency and care.

Continuous improvement — Safeguarding is never a “set and forget”. This section outlines how AHL reflects, learns and adapts, using feedback, data and lived experience to strengthen our practice and make sure we are always improving how we keep children and young people safe.

Key Concepts:

Safeguarding Systems – Operations are the backbone of safeguarding. They include recruitment, training, policies, procedures, reporting and risk management – all designed to prevent harm and respond effectively when concerns arise

People as Protectors – Safeguarding is not just about systems, it is about the people who implement them. Every AHL Person plays a vital role in keeping children and young people safe

Suitability and Accountability – AHL makes sure that all staff, volunteers and contractors are safe, suitable and supported. This includes screening, supervision and ongoing professional development

Clear Policies and Procedures – Policies set expectations; procedures explain how to meet them. Together, they guide consistent and confident safeguarding practice across all roles.

Safe Practice and Culture – Day-to-day behaviours, decisions and interactions must reflect AHL’s safeguarding values. Good practice is proactive, inclusive and culturally safe.

Responsive Systems – AHL’s operations include clear pathways for raising concerns, making complaints and responding to disclosures. These systems must be accessible, trauma-informed and culturally respectful.

PEOPLE

Even with strong policies, systems, and best-practice approaches, risks to children and young people can still exist. Ultimately, policies and procedures can't protect children and young people alone, the people who implement them play a vital role in children and young people's care and protection. That's why we expect every AHL Person to play a role in preventing harm, keeping children and young people safe and prioritising their wellbeing.

We commit to:

- **Recruiting the right people** — we use clear child-focused recruitment practices from advertising through to interviews, reference checks, onboarding and probation. We take all necessary steps to identify the most suitable people to work with children and young people and discourage unsuitable people from applying or being appointed.
- **Ongoing suitability** — being suitable to work with children and young people isn't about a one-off clearance, it's something we expect AHL People to demonstrate every day, in how they show up, speak up, and support others with care and integrity. At AHL, suitability is assessed not just at the point of recruitment, but continuously, through supervision, professional development, and organisational culture.
- **Continuous support and development** — we provide ongoing support to build confidence and skills in safeguarding practices. This includes ongoing supervision, training and professional development.
- **Child-focused organisational culture** — we foster a workplace where concerns can be raised early, and where the safety and wellbeing of children and young people always comes first.

Our goal is simple: to make sure everyone working with or near children and young people at AHL is safe, suitable and supported to uphold the highest standards of safeguarding.

Recruitment

We are committed to making sure AHL People are the right fit for the services we provide, and the recruitment process is a vital step in achieving this. We apply child-safe recruitment practices to reduce the risk of harm through:

1. **Advertising roles** — clearly stating our commitment to child safeguarding in all job advertisements (including those for staff, volunteers and contractors) — when advertising and recruiting for the role, it is important to show our commitment to and promote safeguarding. Our commitment statement should be included in the advert to not only demonstrate we take safeguarding seriously, but to also deter any potential unsuitable candidates from applying.
2. **Suitability screening** — prior to interviewing a candidate, we can undertake a number of initial screening steps to help identify if they are the right fit for the job. Screening candidates is not just about undertaking working with children checks (WWCC) and criminal history checks, while this is an important component of the process, vetting of other components such as resumes, cover letters and selection criteria responses is essential. During the recruitment process AHL People must make sure they:
 - **Adequately assess resumes and cover letters** — this is a good opportunity to identify potential 'red flags'. We should be curious about any gaps in employment and question any potential boundary issues identified. If there are any parts of their working history that require further

clarification, don't make assumptions — make sure these are raised in the next phase of the recruitment process with the candidate.

- **Develop appropriate selection criteria** — this helps us assess if the candidate has the required knowledge and skills for the position. The criteria should be child-focused and provide opportunity for the candidate to demonstrate their understanding of appropriate behaviours when working with children and young people. This is also a good opportunity to explore a candidate's experience and capability when working with diverse needs of children and young people, for example, experience working with First Nations children and young people and children and young people with disabilities.
- **Confirm WWCC status** — prior to commencement, all new staff and volunteers must hold a current WWCC in the State or Territory they will be working in — if the relevant State or Territory allows them to apply. AHL must also make sure we have validated the positive status of the WWCC with the relevant state or territory regulator. WWCC's are a good screening measure, however, alone do not safeguard children and young people. It is only one part of creating a child safe environment. Many offenders will not have previously detected records preventing them from working with children (*see 'Helpful links and resources' at the end of this chapter for information on pre-employment checks*).
- **Undertake national criminal history checks** — obtaining a candidate's criminal history also supports the suitability screening process. A police check differs from the WWCC, it provides a list of any offences a person has committed prior to the date the certificate is granted. We must make sure that a police check, obtained no earlier than six (6) months prior, is obtained for each and all AHL People, and is verified prior to their commencement. If there is an adverse check that involves a child or young person related offence, this candidate is not suitable and this is non-negotiable. If there is another type of adverse check returned, then a risk assessment must be completed as to whether the recruitment of the staff or volunteer continues. If it is deemed that can progress, appropriate strategies must then be put in place to manage any identified risks. Some things to consider regarding an adverse check includes:
 - the type of offence
 - age of the candidate at the time of the offence
 - time lapsed since the offence was committed
 - frequency of the offences
 - individual explanations of the offence.
- **Verify a candidate's identity** — additional checks include verifying the candidate's identity to ensure they are who they say they are. This can be viewing their passport or drivers licence to check the name is the same. It is best practice to photocopy their identity check documents, sign, date and witness them and then keep them on record.


Candidates can not commence work in a child-related role until all background checks are satisfactorily completed and verified.

How we know we're doing it well:

- AHL's recruitment and supervision practices prioritise the safety and wellbeing of children and young people
- Children and young people are and feel safe around AHL People
- AHL People have, or are working towards having, suitable skills and experience to work with children and young people
- Training records are complete, accurate and regularly reviewed
- AHL attitudes and behaviours create, maintain and improve a child safeguarding culture
- Children, young people and families report feeling safe and confident that AHL People will listen to them and respond to concerns
- AHL People's values align with the organisation's commitment to child safety
- AHL People feel confident and safe to report possible boundary breaches and misconduct that violates the Child and Young Person Safeguarding Behavioural Standards by their colleagues, including their supervisor and leadership team
- AHL has a culture of continual learning
- AHL can demonstrate it stays up to date with emerging best practice
- AHL People demonstrate cultural safety in practice (e.g. respecting protocols, working with families, upholding identity and connection)
- Safeguarding practice is a standing agenda item in supervision, feedback processes, and performance reviews
- AHL People apply learning in daily practice - not just in training sessions.
- AHL People feel confident to identify, respond to and report child abuse and neglect

3. **Interviewing processes** — During recruitment, AHL uses values-based and behavioural interview questions to assess not only skills, but also a candidate’s attitudes, integrity and suitability to work safely with children and young people. Safeguarding questions are a mandatory part of every interview in roles that will work both directly or indirectly with children and young people. Topics we always cover include:


- **Approach and attitudes** — how the candidate views working with children and young people, including respect, boundaries, inclusion and safety
- **Experience** — practical examples of working directly with children and young people, including managing challenging or sensitive situations
- **Cultural safety and trauma-informed practice** — understanding of First Nations cultural safety, and ability to respond in respectful, culturally appropriate and trauma-informed/aware ways
- **Criminal history and misconduct** — clarification of any convictions, disciplinary action, or findings of unprofessional conduct
- **Red flags** — probing gaps in CVs, unexplained career breaks, or inconsistencies between written applications and interview responses.



Warning signs in candidate responses:

- Minimising or dismissive attitudes towards safeguarding, cultural safety or child protection
- Lack of concrete examples of safe and respectful work with children and young people
- Inconsistent, vague or defensive answers
- Evasive when asked about past work history and conduct.

Best practice is to conduct face-to-face interviews where possible as it allows for stronger observation of body language and authenticity. However, in certain circumstances this is not always possible — in this instance a virtual interview (e.g. Microsoft Teams) is a good alternative but must be conducted with the same level of rigour.



What we look for in strong candidates:

- Consistent, thoughtful answers that show genuine respect for children and young people.
- Clear commitment to safeguarding, cultural safety, anti-racism and inclusive practice
- Examples that demonstrate accountability, reflection and learning from past experiences
- Alignment with AHL’s safeguarding, values, mindset, commitments and zero tolerance of abuse or unsafe practices

4. **Reference checks** — 2 reference checks should be completed and ideally these should be verbal with the referee also completing a written response. The reference check must contain safeguarding questions to assess any history of working with children and young people, their approach to safeguarding and their suitability for the role. The staff member conducting the checks must be appropriately trained. References should be from former or current employers, volunteer roles or places of study. It is recommended that at least one (1) check is the candidate’s most recent line manager. If you are not satisfied with the responses to the checks, you may request additional referees from the candidate.
5. **External providers and contractors** — Where AHL uses the services of external contractors or services, the WWCC legislation in the respective jurisdiction must be complied with. If it is not possible to obtain the check, AHL must support, closely supervise and monitor those delivering child related services, including those where they have infrequent/indirect contact with children and/or young people. The recruitment, screening and induction requirements must be relevant to the frequency and nature of the engagement with children and young people. All AHL People, including

contractors, must also be required to read, understand and sign the Children and Young People Safeguarding Policy, and the Child and Young Person Safeguarding Behavioural Standards.

Education and training

We recognise that ongoing training and support is needed for all AHL People to effectively incorporate children and young people's safety and wellbeing considerations into decision-making and practice approaches. We are committed to making sure that all AHL People receive training and support relevant to their roles to support them in understanding their responsibilities in relation to safeguarding. Including formal and informal processes such as training, supervision, performance reviews, staff meetings, mentoring, and continuous improvement and reviews strategies.

We are committed to building and maintaining a culturally safe and child-safe workforce by making sure all AHL People are equipped with the skills, knowledge, and confidence to prioritise and uphold the safety and wellbeing of children and young people. We recognise that ongoing support is needed to effectively incorporate children and young people's safety and wellbeing considerations into decision-making and practice approaches. We are committed to making sure that all AHL People receive training and support relevant to their roles to support them in understanding their responsibilities in relation to safeguarding.

Our approach to professional development recognises that learning is ongoing and most effective when paired with strong leadership, supervision, and a supportive team environment. It incorporates formal and informal processes, including:

- ***Mandatory and ongoing training*** — we require all staff and volunteers to complete initial and ongoing professional development in areas relevant to child protection, safeguarding and wellbeing. Additionally, they must complete refresher training at least annually or more frequently if required by their role, location, or after changes in legislation or organisational policy. Training and professional development is provided on various topics that supports the safety and wellbeing of children and young people, including:

- safeguarding principles, standards and practices
- AHL’s Child and Young Person Safeguarding Framework
- child protection laws and reporting obligations
- cultural safety and working respectfully with First Nations children, young people, families, and communities
- trauma-informed and aware care
- preventing and responding to grooming behaviours, boundary violations, and abuse
- responding to disclosures
- promoting children and young people’s participation and rights.
- **Informal learning and additional support** — we recognise that child safeguarding practice is strengthened not only through formal training but also through everyday support and reflection. We support AHL People with informal training and support through:
 - regular team discussions and debriefs about complex situations involving children, young people and their families
 - access to cultural advisors and/or Elders for guidance on culturally sensitive matters
 - peer mentoring or buddy systems for new staff and those working in high-risk or isolated environments
 - reflective supervision that includes opportunities to explore child and young person safeguarding dilemmas, ethical concerns, and professional boundaries
 - consultation with internal and external staff who have safeguarding subject matter experience and expertise.
- **Leadership and accountability** — our leaders play a pivotal role in upskilling and supporting our staff. It is expected that AHL People in leadership positions:
 - model child-safe behaviour and lead conversations about safeguarding during team meetings, planning sessions, and supervision
 - identifying training needs, ensuring completion of mandatory modules, and supporting continuous learning
 - focus on adherence and commitment to safeguarding obligations and practices when undertaking performance reviews.

Questions we can ask to reflect on how effective our training and support is:

- How are AHL People made aware of the signs and indicators of abuse and neglect? - and how do we check they understand them and are confident to act to keep children and young people safe?
- How are AHL People trained in child safe practices? - and how do we check they understand their safeguarding roles and feel confident in applying this to their work?
- How do we provide training for AHL People working in higher-risk roles and situations, including working with children and young people with vulnerabilities?
- How do we know AHL People are confident to ask for help when reporting abuse and inappropriate conduct? - do they know where to go for advice, support or clarification about their safeguarding responsibilities?
- How do we ensure short-term casual, agency or contract staff are properly inducted and know the expectations of our organisation?
- How do we track participation in training and refreshers, and use this data to improve workforce capability?
- How do we record AHL's participation in training?
- How do we ensure induction is delivered in a way that is accessible and relevant to diverse staff (e.g. plain English, culturally safe, role-appropriate)?
- How do we engage Aboriginal and Torres Strait Islander experts and knowledge holders in co-designing or delivering training?
- How do we ensure training builds understanding of intergenerational trauma and strengthens culturally responsive practice?
- How do we measure whether AHL People can demonstrate culturally safeguarding behaviours in daily interactions with children, families and communities?
- How do we use feedback from children, young people, families and AHL People to understand capability needs and adapt training and support as required?
- How do we stay up to date with new legislation, best practice, and emerging risks, and reflect this in our training and support processes?

All AHL People must complete our Child and Young Person Safeguarding Induction. This induction includes:

- an introduction to AHL’s Child and Young Person Safeguarding Policy and child and young person safeguarding framework
- understanding of the National Principles for Child Safe Organisations, the Commonwealth Child Safe Framework, and relevant state and territory child safe standards/obligations

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- training in the rights of children, cultural safety, and child protection and safeguarding reporting responsibilities
- information about expected conduct, behaviour standards, and boundaries when working with children.

This induction is mandatory before commencing direct contact with children.

Fundamental to our support and professional development strategy is culturally safe and contextual learning. Our training is developed and adapted to reflect the cultural backgrounds of First Nations children, young people and their families, and wherever possible we engage First Nations experts and local knowledge holders to deliver or co-design content. Additionally, we promote understanding of the intergenerational impacts of trauma and the need to embed culturally responsive practices into our operating environment.

We are committed to evaluating and continuously improving our professional development strategy to maintain its effectiveness and applicability to contemporary safeguarding practices and the AHL operating environment. Part of this review process includes analysing staff, child, young person and family feedback, reviewing incident responses, and where necessary undertaking external reviews. Additionally, training content and delivery methods are updated regularly to reflect current best practice, legislation changes, and feedback from children, young people, families, and communities.

LEGISLATION, POLICIES, PROCEDURES AND PRACTICE

Safeguarding children and young people at AHL is supported by a layered and interconnected system of legal obligations, organisational policies, operational procedures and everyday practice. Each element plays a distinct role, but it is their alignment and integration that ensures safety is embedded across all aspects of our work.

- Legislation provides the legal foundation. It defines our responsibilities under Commonwealth, state and territory laws, including mandatory reporting, child safe standards and privacy obligations.
- Policies translate these legal requirements into clear organisational expectations. They outline what AHL People must know, do and uphold to protect children and young people.
- Procedures offer practical, step-by-step guidance on how to implement policies in real-world settings. They support consistency, accountability and confidence in safeguarding actions.
- Practice is how these commitments come to life. It reflects the behaviours, decisions and interactions of AHL People every day, and is shaped by our values, training, supervision and organisational culture.

Together, these components form a safeguarding system that is legally sound, culturally safe and practically effective. This section explains how each part works, and how AHL People can use them to uphold the safety and wellbeing of children and young people in every role and setting.

Legislation

Safeguarding children and young people is not only a moral and organisational responsibility, it's also a legal one. AHL operates within a complex legislative landscape that includes Commonwealth, state and territory laws designed to protect children and young people from abuse, neglect and exploitation.

Understanding these legal obligations is essential for all AHL People. They guide how we respond to concerns, report harm, manage risk and uphold the rights of children and young people in our care.

All AHL People must be familiar with the legislation relevant to their role and location and seek guidance if unsure. Our policies and procedures are designed to support compliance with these laws and to make sure that safeguarding is embedded in all aspects of our work.

Policies

Strong safeguarding policies are essential — they don't just set out AHL's commitment to safeguarding children and young people, they also guide and support AHL People to carry out their work safely across all teams and services.

Our Commitment Statement to Children and Young People, Child and Young Person Safeguarding Policy and Child and Young Person Safeguarding Behavioural Standards form the policy foundation for AHL's Child and Young Person Safeguarding Framework and Handbook. These core documents explain the expectations, responsibilities and obligations of all AHL People. They must be read and used alongside other policies, processes, guides and systems relevant to your team/business unit.

All AHL People will receive these policies prior to starting work at AHL, and you will be informed whenever they are reviewed and updated. These policies apply to:

- all activities at AHL hostels and services involving, or related to, children and young people
- all planning, activities, practice and decisions that directly or indirectly affect children and young people's experiences in our services (e.g. risk assessments, service delivery planning, policy development, recruitment etc).

To help keep children and young people safe, everyone must know, understand and follow our policies and procedures, it is expected that:

AHL Leadership:

- make sure AHL People are aware of relevant policies, procedures, legal requirements and related documents/frameworks that guides practice
- check that AHL People understand and can meet their legal and organisational safeguarding requirements and responsibilities
- model culturally safe, respectful and inclusive behaviour in all aspects of leadership, communication and decision-making
- prioritise the cultural capability development of AHL People and embed cultural safety expectations in performance planning and supervision

All AHL People must:

- be familiar with, and comply with, all legal obligations and organisational safeguarding policy and procedural requirements
- seek guidance and assistance from their supervisor and/or leadership team members if unsure of how to fulfill their obligations and requirements
- engage in additional professional development and support as required (as approved by their manager/supervisor) to fulfill their work roles and responsibilities
- respect and uphold cultural protocols, practices and perspectives in their daily work and decision-making

- actively contribute to safe and inclusive environments where children and young people feel seen, respected and connected.

Policy consultation

When developing, updating and reviewing the implementation of safeguarding policies, and policies that impact children and young people, stakeholder consultation and engagement is critical.

This includes consultation where possible with:

- children and young people
- families and communities
- AHL People and sub committees
- external providers.

When engaging with children, young people, families and communities, AHL will ensure the approach is culturally safe, age-appropriate, trauma-informed and respectful. Engagement should only be carried out by staff who are trained and supported to do so, and must always prioritise the safety, wellbeing and dignity of those involved.

To make sure thorough consultation is carried out, a good cross section of stakeholders is required, and a range of consultation/feedback methods should be used. For example, through open forums, consultative meetings, suggestions boxes, surveys or feedback forms. It is important that everyone who participates in consultation is informed of the purpose of the consultation, how the information will be used and the outcome of the consultation (including how their feedback was/was not used and the reasons for this).

Reviews should be regular (at the very minimum annually) and feedback on the practical implementation of policies should be encouraged. Any consultation on policy development or review should also be documented, including how consultation feedback was or was not actioned.

Policy development

When AHL People develop new policies, or review existing ones, they must be clear, practical and supportive of safeguarding practice. Good policy development means:

- **Clear purpose** — every policy must state our zero tolerance to child abuse, our commitment to safeguarding children and young people, and link to our Child and Young Person Safeguarding Policy and Child and Young Person Safeguarding Behavioural Standards.
- **Accessible language** — policies should be user-friendly, written in plain English, and meaningful for AHL People, children, young people and families. Wherever possible, child-friendly versions must be created.
- **Publicly available** — policies should be accessible in a variety of formats. If published online, they must be downloadable and easy to share.
- **Inclusive and respectful** — policies must consider diverse needs, respect cultural protocols, and embed First Nations cultural safety. This means engaging cultural advisors and community voices in development. Policies should reflect that First Nations children and young people have the right to be and feel safe, and to grow up strong in their identity, culture and connection to family, community and Country.
- **Administrative details** — every policy must include an effective date, review date, author(s), and reference to related policies. They should also provide a list of related documents or policies that must be read in conjunction with the policy being developed.

- **Legal and compliance requirements** — policies must identify relevant legislation and regulations, define key terms, specify who the policy applies to and include version controls.

Safeguarding requirements that must be incorporated in all policies, includes:

- **Action for imminent risk** — describe clearly what AHL People should do if a child or young person is at immediate risk of harm.
- **Reporting obligations** — specify when reports must be made, to which authority (i.e. Police, Reportable Conduct Schemes, Child Protection services), and by whom.
- **Consequences for breaches** — state the disciplinary actions for failing to comply with the policy (e.g. suspension, dismissal).
- **Training requirements** — identify what training or professional development is needed so AHL People can put the policy into practice.

Procedures

Procedures are the practical tools that help AHL People turn policy into action. While policies outline what we must do to keep children and young people safe, procedures explain how to do it, step-by-step, in real-world settings.

They provide clarity, consistency and confidence across all roles and services — whether responding to a safeguarding concern, managing risk or engaging with children and families — procedures make sure that AHL People know what is expected and how to act appropriately.

Effective procedures:

- Translate policy into clear, actionable steps
- Support consistent safeguarding practice across teams and locations
- Reduce ambiguity and help prevent errors or omissions
- Provide guidance during complex or high-risk situations
- Ensure accountability and transparency in decision-making.

Procedures must be:

- Accessible — written in plain language and available in formats that suit different roles and contexts
- Relevant — tailored to the specific responsibilities of AHL People, including frontline staff, managers, contractors and volunteers
- Regularly reviewed — updated to reflect changes in legislation, policy, feedback or emerging risks
- Supported by training — reinforced through induction, supervision and ongoing professional development.

AHL procedures

Some procedures apply across all areas of AHL (for example mandatory reporting, responding to disclosure, managing complaints), while others are specific to particular roles, services or settings (for example hostel operations, transport, online engagement).

Below are examples of core procedures, supporting systems and behavioural boundaries that will help uphold our safeguarding commitments. Some of these procedures are already expressed in existing materials (e.g

Secondary Education Staff Handbook). Through implementation, existing materials will be established, or updated, to align to the framework.

Core Safeguarding Procedures

The procedures outline essential actions that directly protect children and young people:

- **Mandatory Reporting** — how and when to report suspected abuse or neglect
- **Responding to disclosures** — steps to take when a child or young person shares a concern
- **Transporting children and young people** — safe travel protocols and supervision requirements
- **Use of imagery** — obtaining consent and managing photos/videos appropriately
- **Online and digital communication** — safe use of social media, email and phone contact.

Supporting Procedures and Systems

These procedures help maintain safe, respectful and legally compliant environments:

- **Record keeping and data management** — maintain accurate and secure records
- **Information sharing and privacy** — sharing information lawfully and respectfully
- **Consent and participation processes** — ensuring children and young people are informed and involved in decisions that affect them.

Behavioural boundaries

These experiences are linked to AHL's values and the APS Code of Conduct and Child and Young Person Safeguarding Behavioural Standards. They help define safe and respectful interactions:

- **Physical contact** — appropriate and respectful physical boundaries
- **Giving and receiving gifts** — avoiding personal or inappropriate gifting
- **Contact outside of AHL** — maintaining professional boundaries beyond the workplace.

All procedures are supported by training, supervision and regular review. AHL People must be familiar with the procedures relevant to their role and seek guidance if unsure. These procedures are designed to protect children and young people, and to support AHL People to act with confidence, care and integrity.

Practice

Practice refers to the way things are done at AHL and are a reflection of our culture.

Practices may include formal documentation, however, are more often the result of organisational culture and the way things are done over time. These can be positive but can also be negative in some cases if poor habits become part of everyday AHL practices. Therefore, it is important to ensure we continue to strive for good culture, follow all AHL policies and procedures and live by our values (*please refer to the values, behaviours and mindset section for more information*).

Below are some examples of what poor practice can look and feel like at AHL:

- AHL People and children and young people don't feel empowered or supported to speak up on issues
- AHL People are confused about safeguarding and don't have clear expectations of their roles and responsibilities
- Children and young people don't understand or receive information regarding AHL's safeguarding commitment, responsibilities, requirements and approach
- AHL People and children and young people are misinformed or not kept up to date

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- AHL People and children and young people aren't involved or consulted in decision making
- There are limited opportunities for learning and development or to participate in key activities
- Children and young people don't know how or don't feel comfortable raising concerns.

Alternatively, some examples of what good practice looks and feels like are:

- AHL's safeguarding commitment, obligations and approach are clearly communicated in a range of accessible formats
- Children, young people, families and AHL People feel supported and are able to participate in a safe and inclusive environment
- AHL People are encouraged and feel safe to participate and provide feedback — and they are open to feedback being provided to them
- Learning and development opportunities are ongoing and accessible
- There is a shared sense of responsibility in keeping children safe across all levels of AHL
- Children, young people, families and AHL people feel comfortable and confident in speaking up if they have concerns or want to provide feedback on how to improve services
- Children and young people feel safe and are safe and are having a positive experience at AHL

We know it can be difficult to challenge or speak up against poor practice and behaviours — especially if it is a colleague more superior to you. However, it is important that you do speak up if you see, hear or feel something that goes against AHL's values, policies, procedures or behavioural standards as this ensures you are doing your bit to keep children and young people safe.

It should be noted that challenging poor practice is different to your reporting obligations. You must report child safety and protection issues or concerns, whereas challenging poor practice is not mandatory. However, it is still very important to raise any concerns you may have about another AHL Person's behaviour.

It can be difficult to speak up about poor practice and behaviour, but you must remember it is important for everyone — especially children and young people. Below are some tips on how you can challenge or speak up about poor practice at AHL:

- practice with your peers/colleagues or families and friends
- know what you are going to say — be clear but remain respectful and non-threatening
- assess the situation, sometimes it isn't the right moment but other times the opportunity is there and then
- you may wish to write it down first to help
- speak with your manager or supervisor
- if the behaviour or poor practice involves your manager or supervisor you can always reach out to their superior.

Communication and accessibility

Safeguarding at AHL is only effective when legislation, policies, procedures and practices are clearly communicated, consistently reinforced and meaningfully understood by everyone, especially children and young people.

This means going beyond written documents. It's about creating a safeguarding culture where expectations are visible, accessible and actively supported in everyday practice.

What communication and accessibility looks like across AHL

- **Legislation**
 - Legal obligations (for example mandatory reporting, privacy, child safe standards) must be explained in plain language and supported by training. AHL People should understand not just what the law requires, but how it applies to their role and responsibilities.
- **Policies**
 - Policies must be easy to find, read and apply. This includes providing child-friendly versions, translated materials and visual formats where needed. Policies should be regularly promoted through induction, team meetings, posters, newsletters and digital platforms.
- **Procedures**
 - Procedures must be practical, step-by-step and tailored to different roles. They should be supported by supervision, refresher training and opportunities to ask questions. Procedures should be embedded in daily workflows and reinforced through coaching, mentoring and peer support.
- **Practice**
 - Safeguarding practice is shaped by how AHL People behave, communicate and respond in real time. This includes:
 - Modelling respectful and protective behaviour
 - Creating safe spaces for children and young people to speak up
 - Using inclusive and culturally safe communication styles
 - Responding to concerns with clarity, empathy and accountability

Questions we can ask to reflect on how effectively we are using safeguarding policies and procedures:

- Do our policies and procedures address child safe standards and principles?
- How do we make our child safeguarding policies and procedures specific to AHL?
- How do our leaders champion a culture of compliance with our child safeguarding policies and procedures?
- Have we made our child safeguarding policies and procedures publicly available and easy to understand?
- How do we know that AHL People are implementing our child safeguarding policies and procedures?
- How are our child safeguarding policies and procedures embedded in all operational aspects of AHL?
- What happens if policies and procedures are not followed?

Making safeguarding accessible to children, young people and families

- Use posters, handouts and visual aids that explain rights, responsibilities and complaint pathways
- Provide materials in child-friendly language and formats (for example illustrated guides, videos)
- Offer translated resources and culturally appropriate messaging
- Make sure children and young people know who they can talk to, how to raise concerns, and what will happen next
- Create feedback loops that show how input from children, young people and families leads to change (“You Said, We Did”)

Embedding communication in everyday practice

- Include safeguarding messages in recruitment, onboarding, supervision and performance reviews
- Reinforce expectations through team meetings, training and reflective practice
- Encourage open conversations about safety, rights and responsibilities
- Make safeguarding visible in the physical environment, through signage, artwork and accessible materials.

RECORD KEEPING, DATA MANAGEMENT, INFORMATION SHARING AND PRIVACY

AHL acknowledges the importance of maintaining accurate, secure, and confidential records that support the safety, wellbeing, and rights of children and young people. We are committed to developing and maintaining record keeping, data management, information sharing and privacy requirements systems in line with best practice approaches and legislative requirements. AHL People must:

- maintain records, confidentiality and privacy for children, young people and families in accordance with federal, state and territory legislation and requirements
- adhere to AHL record keeping processes and systems
- engage in information sharing in consideration of the best interests of children and young people and in line with legislative requirements
- treat all records as sensitive and handle them with care and respect, especially when involving First Nations children, young people and their families. Handling of information related to First Nations children, young people and families must respect cultural protocols, identity, and community roles.

Our records relating to child and young people's safety and wellbeing must be clear, accurate, factual and document the decisions and actions taken to protect or support children and young people. Records must be securely stored in accordance with the *Archives Act 1983 (Cth)* and our organisational records management policies. Retention of records for periods will align with relevant legislation and policies, including for:

- serious incidents, allegations, and complaints. These must be kept securely for as long as legally required, including beyond the period of a child turning 18
- case management, wellbeing concerns, or risk assessments. These must be kept in accordance with applicable child protection and organisational policy guidelines.

We are committed to embedding data control and management mechanisms that facilitate privacy and confidentiality. This includes:

- child and young person related data (including incident reports, disclosures, and complaints) is restricted to authorised personnel only
- access to child and young person safety records is controlled through secure systems with role-based permissions
- regular audits and reviews are conducted to review data integrity, confidentiality, and compliance
- systems used to manage data must meet Commonwealth standards for cybersecurity and privacy compliance.

We recognise that appropriate, timely, and lawful information sharing is essential to keeping children and young people safe and promoting their wellbeing. We share information about children and young people only:

- with informed consent (where safe and appropriate)

- when legally required or permitted under law (e.g., with child protection authorities, police, courts)
- where there is a serious risk to the safety or wellbeing of a child, young people or others.

To enable adherence to information sharing AHL People receive training and support to understand:

- thresholds for sharing information without consent (e.g., mandatory reporting)
- how to balance a child and young person's right to privacy with their right to be protected from harm
- how to share information respectfully, especially in the context of cultural safety.

We manage personal and sensitive information in accordance with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles (APPs)*. This means:

- only collecting personal information that is necessary, and doing so by fair and lawful means
- providing children, young people and families with clear information about:
 - what information we collect and why
 - who it may be shared with
 - how it will be stored and for how long
- ensuring individuals can access and request correction of their personal information, subject to legal exceptions
- handling privacy breaches seriously and reporting them through designated procedures.

We are committed to continuously improving our record keeping, data management, information sharing and privacy processes and systems. To enable this:

- AHL People receive training in privacy, information management, and documentation standards
- data and record-keeping practices are regularly reviewed and updated in response to legislative changes, recommendations from incidents, audits, or inquiries, and feedback from children, young people and families.

How we know we're doing it well:

- AHL People, children, young people, families and the community understand our approach to safeguarding.
- AHL People, children, young people, families and the community know we take safeguarding seriously.
- AHL People, children, young people, families and the community know where to find our safeguarding policies, procedures and resources.
- AHL People, children, young people, families and the community can use safeguarding policies and procedures to hold us to account.
- Children and young people know that there are rules in place to keep them safe, they understand them and know where to find them.

SAFEGUARDING CONCERNS AND COMPLAINTS

Raising concerns and making complaints in an organisation can be difficult — the process can be complex and confusing, particularly for children and young people. Speaking up isn't always easy. For children and young people, it can feel confusing, scary, or even unsafe to raise a concern. Some may not even know they have the right to say something if they feel uncomfortable, unsafe, exploited or mistreated.

That's why AHL has made a clear commitment — every child and young person should feel safe, heard, supported and empowered to speak up. When they do, we treat their voice with respect, we take it seriously, and there is zero tolerance for retaliation — no one will ever be punished for raising a concern



or making a complaint.

What this means in practice:

- **Safety first** — if a concern or complaint is raised, the child or young person's safety and wellbeing comes before everything else
- **Everyone has a role** — all AHL People must take concerns and complaints seriously — whether it's about another AHL Person's behaviour, a child or young person's wellbeing, or something that "just doesn't feel right"
- **Everyday culture** — part of keeping children and young people safe is speaking up early. If you see or hear behaviour that feels unsafe or outside AHL's Safeguarding Behavioural Standards, policies and procedures you are expected to respectfully question it
- **Conversations matter** — talk to children and young people about their right to speak up, how they can raise concerns or make a complaint and how we can make it easier and more accessible for them to provide feedback. Let them know what will happen if they raise a concern or complaint and reassure them they will be supported.

We are committed to helping children, young people and families understand how to raise concerns or make a complaint. We make information about rights and complaints clear and accessible by:

- displaying posters, plain English handouts, and online information about our safeguarding practice, expectations and responsibilities, their rights and how to raise concerns

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- creating versions of policies for children and young people written in their language and style
- translating materials or visual aids for children, young people and families who need them
- explaining that children and young people can always bring a trusted support person with them — like a parent, guardian, Elder, advocate or community member.

We empower children and young people to speak up and support them to understand that they:

- have a right to be and feel safe
- can say no, stop or change their mind (i.e. withdraw consent) at anytime
- should tell someone if something feels wrong or they need help
- will be believed, supported and never punished for speaking up.

We are committed to embedding accessible and child-friendly reporting avenues through providing clear, safe and age-appropriate ways to raise concerns and make complaints. We use trauma-informed practices and adjust our approach based on each child or young person's age, disability, language, and background. This means we must provide multiple pathways that are child-friendly, safe and culturally appropriate, including:

- talking to an AHL Person in person (or putting it in writing)
- child-friendly feedback forms (paper or digital) in every hostel
- anonymous options like suggestion boxes or digital submissions
- emailing or providing general feedback online
- raising issues through staff meetings, supervision, or debriefs
- translating materials and visual aids to help children with limited literacy or English as a second language
- accessing support from trusted cultural staff, Elders, or advocates
- where needed, culturally mediated or restorative approaches that support healing and trust.

Responding to safeguarding concerns

There are various ways you may become aware of a safeguarding concern. For example:

- you may see or hear something from another AHL Person that might breach AHL's Child and Young Person Safeguarding Behavioural Standards
- a child or young person could disclose a concern, worry, incident or abuse
- you may witness a child being harmed or being at risk of harm.

'Helpful links and Resources' at the end of this chapter for information on responding to disclosures and identifying child abuse.

If a child or young person discloses to you, try to follow these steps:

- Listen carefully to all they say.
- Tell them you believe them and it's not their fault.
- Let them know you will do everything in your power to help them, but do not make promises.
- Let the child or young person know that you will need to tell someone to help keep them safe. Though this may upset the child or young person, it is very important that you act protectively and in their best interest.
- Do not force them to talk about it, you are there to listen to what they want to tell you.
- Do not use direct or leading questions.
- Importantly: follow your obligation to report as soon as practically possible.
- When documenting, use the child or young person's exact words as best you can.

If a child or young person is in immediate danger, you must call 000 immediately.

Remember, it can be a scary experience to raise a concern of any kind- even for adults. AHL People in front-line roles (particularly Hostel team members) should make sure that:

- the children and young people you interact with know that we are here to help them and hear them in a non-judgmental way
- when a child or young person comes to you with concerns or wants to make a complaint you make sure not to lead the conversation. Let them explain themselves whilst you offer reassurance that you will take it seriously and confirm that their complaint can help us to improve our services
- thank them and let them know that you will keep them informed at each step of the process.

Depending on the nature of the concern, you may have legal obligations to report to the police, child-protection agencies or accreditation/regulation bodies. Once you have met all your reporting requirements, you may need to undertake or request an internal AHL investigation of the concern.

If a concern or allegation is made regarding a suspicion of a child or young person being harmed or at risk of being harmed, AHL's Child Protection (Mandatory Reporting) Policy must be adhered to. Elements pertaining to this policy include expectations that:

- all AHL People have an obligation to raise safeguarding concerns with management relating to staff/volunteer conduct
- all safeguarding concerns or reports regarding child abuse and/or exploitation are treated as serious, investigated and responded to, whether they were made by an adult, a child or a young person
- Upon becoming aware or forming a suspicion of an incident or allegation of abuse, the AHL Person's first responsibility is to ensure that the child or young person is safe, and the risks of further abuse or harm are mitigated
- mandatory reporting requirements and processes are understood and adhered to.

It is important to note that New South Wales, Victoria, Western Australia, Tasmania and the Australian Capital Territory also operate under a Reportable Conduct Scheme. A Reportable Conduct Schemes is also going to commence in Queensland from 1 July 2026. A Reportable Conduct Scheme is an additional legal framework to support protecting children and young people. Under this Scheme if someone in our organisation is accused of harming a child through sexual offences or misconduct, physical assault, significant neglect, or other serious ill-treatment, we must tell the independent regulator overseeing the scheme, investigate the matter, and take steps to protect children while the investigation happens. It does not replace police or child protection reports but adds an extra layer of oversight to make sure allegations are handled quickly, fairly, and with the child or young person's safety as the top priority (*see this chapter's 'Helpful Links' for further details*).

Sometimes a child or young person's behaviour or words may lead you to suspect or become concerned that the child is unsafe or being harmed. In this situation, it is important that you:

- **Do not frighten the child or young person by asking confronting questions.**
- **Let the child or young person know that you are there for them if they ever need to talk.**
- **Record your concerns including any behavioural observations or conversations you may have had with the child or young person.**
- **Importantly: follow your obligation to report as soon as practically possible.**

All AHL People need to make time to support each other in understanding and meeting the requirements of their roles.

Managing safeguarding concerns and complaints

We are committed to delivering a transparent and fair safeguarding concern and complaints management system. Where necessary, safeguarding concerns and complaints may be reported to statutory authorities, including police, child protection services or reportable conduct schemes.

Our safeguarding concerns and complaints management process is:

- **timely** — all safeguarding concerns and complaints involving children and young people are prioritised and investigated quickly
- **fair and impartial** — decision-making is based on evidence, not assumptions or bias
- **documented** — records are securely stored and managed in line with privacy obligations
- **protective** — any immediate risks to a child or young person's safety or wellbeing trigger protective action while the safeguarding concern or complaint is investigated.

If a safeguarding concern or cannot be resolved through an informal process, a decision of whether a matter will be investigated will be made. The decision of whether to investigate should be made through a risk-based approach and would take into consideration (including but not limited to) the:

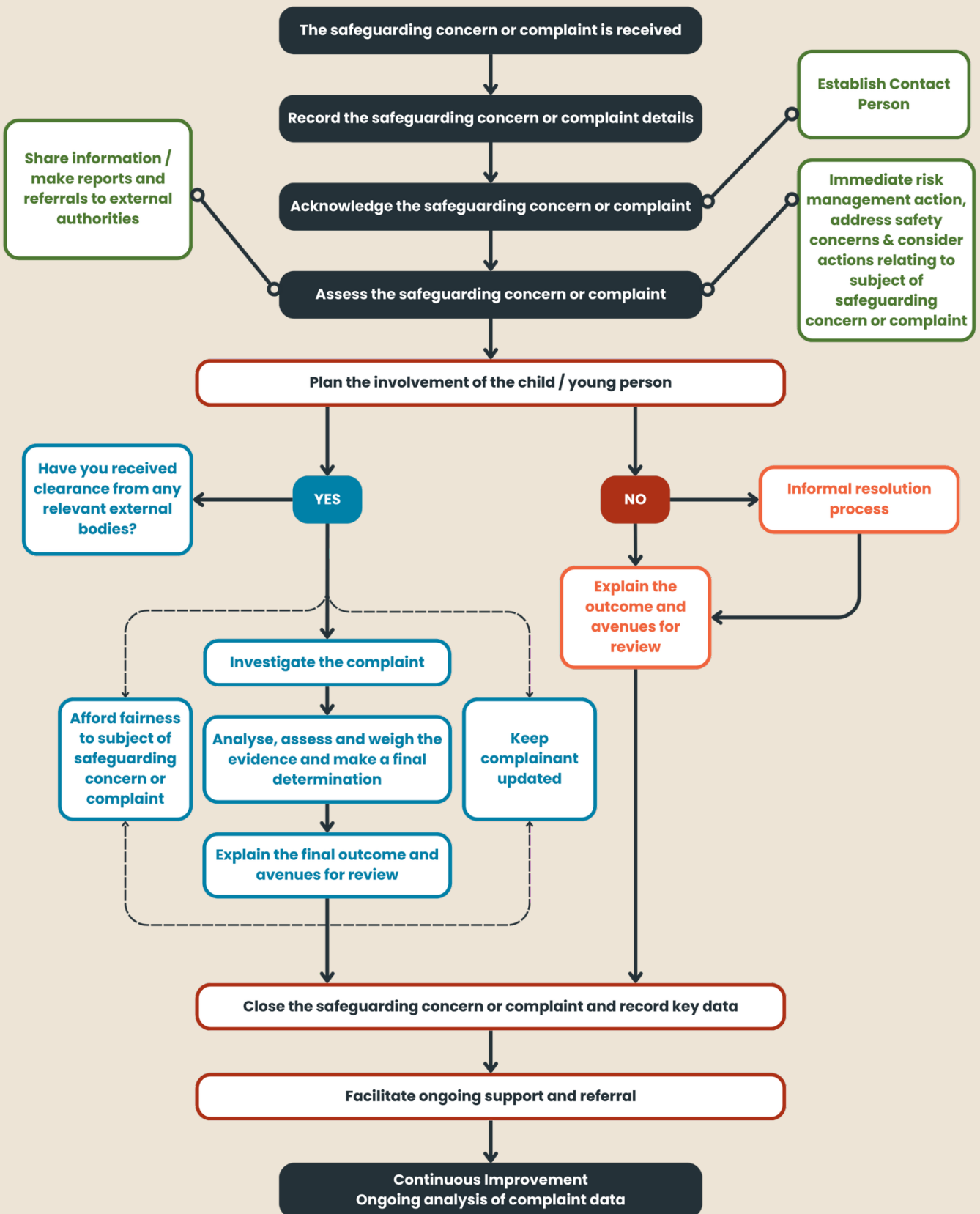
- seriousness of the allegation
- wishes of the person raising the safeguarding concern or complaint
- health, safety and wellbeing of the person raising the safeguarding concern or complaint and others involved
- outcomes sought and any legal obligations.

The decision and reasons should be recorded and communicated with the people involved.

Safeguarding concerns and complaint handling process:

Our safeguarding concerns and complaints handling process is modelled on the National Office for Child Safety's Complaint Handling Guide. It is important that all AHL People understand and can support children, young people, families and the community to understand this process and speak up if they have any concerns or worries. The National Office for Child Safety and several State and Territory Governments have developed complaint handling and reporting guides and resources (*see 'Helpful links and resources' at the end of this chapter*).

Safeguarding concerns and complaint handling flowchart:



Do's and Don'ts when managing safeguarding concerns and complaints:

DO'S	DON'TS
<ul style="list-style-type: none"> - Take every safeguarding concern and complaint seriously - Prioritise the safety and wellbeing of the child or young person - Listen respectfully and without judgement - Respond promptly - Make sure you understand your reporting responsibilities, requirements and processes - Take appropriate notes and ensure accurate records are kept and managed appropriately - Maintain confidentiality — only share information with this who need to know to protect the child or young person and respond to the concern - Monitor and respond to conflict of interests — ensure impartiality and escalate a concern if there is a real or perceived bias - Where appropriate keep the child, young person or family informed of the process — explain what will happen and provide regular updates in age-appropriate and culturally sensitive ways - Offer support — where needed provide access to counselling, advocacy, or independent support for children, families, and AHL People involved. - Ask your supervisor or manager for help and support if you're not sure what to do - Review and learn — use safeguarding concerns and complaints to strengthen safeguarding practices and prevent future harm. 	<ul style="list-style-type: none"> - Dismiss, ignore or minimise the safeguarding concern or complaint - Delay taking action - Confront the alleged perpetrator - Talk about the disclosure or concerns with people who do not need to know - Make promises about the processes or outcomes you can't keep — including secrecy. - Blame, judge or make assumptions about the child, young person, family or AHL People involved - Investigate beyond your role and knowledge base — if allegations involve abuse, pass it to the appropriate statutory authority (e.g. police, child protection). - Retaliate or allow retaliation — we must ensure complainants, including children and young people, are protected from negative consequences of speaking up - Forget to 'close the loop' - always provide feedback to the person raising the concerns or making the complaint (within legal and privacy limits) about the outcome and actions taken.

How we know we're doing it well:

- AHL's culture reflects that we take complaints seriously and act on them
- AHL People feel supported to raise concerns about child safety
- Children and young people feel safe to raise concerns about themselves or their friends
- Families and communities see that complaints lead to fair action, respectful communication, and improvements.

CONTINUOUS IMPROVEMENT

Continuous improvement is one of the foundations of safeguarding practices. It shows children, young people, families, AHL People, regulators and the community that safeguarding isn't a "set and forget" exercise — rather it's something that is always evolving with a strong commitment to reviewing, learning and continually strengthening our practice.

At AHL, continuous improvement means:

- **Learning culture** — we create an environment where AHL People are encouraged to reflect on practice, share lessons, and speak up when something could be done better.
- **Monitoring and evaluation** — we put systems in place to regularly check how we are performing against safeguarding standards, policies and procedures.
- **Feedback loops** — we listen to children, young people, families, communities and staff, and show how their feedback leads to change.
- **Transparency and accountability** — we record what has been improved, communicate it openly, and track whether the changes are effective.

We demonstrate this through:

Governance & Leadership

- **Regular policy and procedure reviews** — we undertake annual reviews of safeguarding policies, ensuring they reflect updated legislation, best practice, and feedback from AHL People and the children, young people, families and communities we engage with.
- **Child safeguarding performance reporting** — we present safeguarding updates (e.g. incidents, complaints, training completion, improvements) to the board and leadership team quarterly (at minimum).
- **Independent audits/reviews** — we commission external child safeguarding audits or peer reviews to identify blind spots.

Voice of Children & Families

- **Child participation mechanisms** — we actively involve children and young people in decision-making (e.g., youth advisory groups, feedback forums, surveys etc) and incorporate this feedback into our ongoing policies, processes, services and activities.
- **Feedback loops** — we share back to children, young people and families how their input has shaped organisational change ("you said, we did").
- **Accessibility checks** — we test child-friendly resources and materials regularly to make sure they remain engaging and understandable.

Data & Evidence

- **Tracking trends** — we monitor safeguarding complaints, incident reports, and near misses for patterns. We use this data to adjust practices.
- **Outcome measures** — we focus on outcomes not just "how many staff trained," but "what difference did the training make" using methods such as knowledge/attitude surveys pre and post-training, reflective supervision and performance reviews.

- **Benchmarking** — we compare organisational practices against national standards (e.g., National Principles for Child Safe Organisations, Commonwealth Child Safe Standards and relevant state and territory Child Safe Standards) or sector peers.

Workforce Capability

- **Capability reviews** — we assess safeguarding capability needed across AHL’s workforce and address any identified gaps.
- **Ongoing training** — we move beyond induction and offer refresher training, scenario-based workshops, and specialist modules (e.g., online safety, complaints management, recruitment, cultural safety, trauma-informed care).
- **Reflective practice** — we encourage regular debriefs, case discussions, or safeguarding circles to help staff reflect and grow.
- **Staff feedback mechanisms** — we encourage feedback from AHL People on barriers to safeguarding practice and act on it.

Questions we can ask to reflect on how we value and implement continuous improvement:

- How do we stay up to date with current child safeguarding practices?
- How do we update policies and procedures to reflect changes to child safeguarding practices?
- How do we include the voices of children, young people, families and communities into reviews?
- How does the feedback from AHL People, children, young people, families and communities influence policy, process and practice change?
- How do we keep the people who provided feedback updated about we did/didn't use their feedback?
- Do we review our child safeguarding policies and procedures following a complaint?
- Has an independent organisation reviewed our child safeguarding policies and practices?
- How would we conduct a root cause analysis/review after a critical incident?

Cultural & Community Responsiveness

- **Cultural safety audits** — we regularly check whether our policies and practices are truly culturally safe. This means inviting First Nations voices — including organisations, staff, families and young people — to review how inclusive, accessible and respectful our services are. Their feedback guides us to improve.
- **Co-design improvements** — we don't make changes on our own. Wherever possible, we work with First Nations organisations, experts and communities to design safeguarding strategies. This ensures our policies, training and everyday practices reflect cultural values, lived experiences and local priorities, not just compliance.

Innovation & Learning

- **Learning from incidents** — we treat every complaint, near miss, or incident as an opportunity to learn and improve practice, not just to resolve.
- **Staying current** — we keep up with new research, technology, and child protection and safeguarding guidance, and update our approaches accordingly.
- **Continuous improvement register** — we document changes made (what triggered it, what changed, outcomes), so there's visible evidence of improvement over time.

The process of **Review, Listen, Learn, Act, Embed** guides our continuous improvement practice. We must demonstrate continuous improvement by showing evidence of:

- Reviewing — policies, procedures and practices
- Listening — to children, families, AHL People, community
- Learning — from incidents, reviews, audits
- Acting — making visible changes and communicating them
- Embedding — sustaining changes, not one-offs.

How we know we're doing it well:

- AHL People are open to change
- AHL People reflect on critical incidents.
- AHL's culture creates an environment of ongoing learning and improvement.
- Children, young people, families, communities and AHL People have opportunities to provide feedback about their experiences and views, and their feedback influences change.

HELPFUL LINKS AND RESOURCES

Pre-employment screening

Australian Institute of Family Studies (AIFS) — [Pre-employment and volunteer screening checks | Australian Institute of Family Studies](#)

Child abuse and neglect

AIFS — [What is child abuse and neglect? | Australian Institute of Family Studies](#)

AIFS — [Reporting child abuse and neglect | Australian Institute of Family Studies](#)

AIFS - [Responding to children and young people's disclosures of abuse | Australian Institute of Family Studies](#)

National Office for Child Safety — [Grooming | National Office for Child Safety](#)

Bravehearts — [What is Grooming? | Bravehearts](#)

Responding to disclosures

Australian Institute of Family Studies (AIFS) - [Responding to children and young people's disclosures of abuse | Australian Institute of Family Studies](#)

Bravehearts — [Responding to a Disclosure of Sexual Abuse | Bravehearts](#)

Reporting child abuse and neglect

AIFS - [Reporting child abuse and neglect | Australian Institute of Family Studies](#)

ACF - <https://professionals.childhood.org.au/prosody/2025/07/what-is-child-abuse-and-neglect/>

Reportable conduct schemes guides and fact sheets

ACT — [Reportable conduct | ACT Ombudsman](#)

NSW — [General information | Reportable allegation against an employee | Office of the Children's Guardian](#)

QLD — [Reportable Conduct Scheme | Queensland Family and Child Commission](#)

TAS — [Reportable Conduct Scheme | Office of the Independent Regulator](#)

VIC — [CCYP | Reportable Conduct Scheme](#)

WA — [Ombudsman Western Australia](#)

Complaint handling and reporting guides

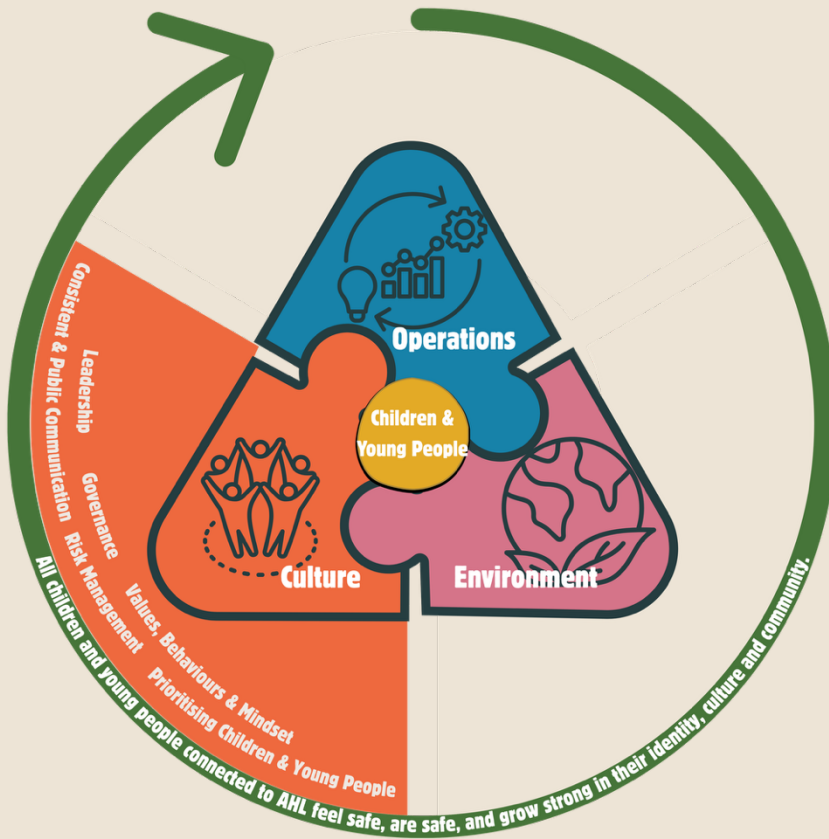
National Office for Child Safety — [Complaint Handling Guide: Upholding the rights of children and young people](#)

National Office for Child Safety — [Helping children and young people to speak up and make a complaint](#)

NSW Office of the Children's Guardian — [Reporting Obligations and Processes](#)

AHL training and resources

ENVIRONMENT



ENVIRONMENT: CREATING SAFE SPACES FOR CHILDREN AND YOUNG PEOPLE

Safeguarding is not only about systems and behaviours, but also about the spaces we create. The Environment chapter focuses on the physical, digital and relational environments where children and young people live, learn, connect and grow. These environments must be culturally safe, inclusive and empowering so that every child and young person feels seen, respected and supported.

For children and young people to feel and be safe, the environments they are in must not only reduce the risk of harm, but also actively support their wellbeing, voice, participation and cultural identity.

At AHL, cultural safety is central to this. When children and young people are surrounded by people who respect culture, value connections to family and Country, and create inclusive spaces, they are more likely to feel strong, respected and safe to speak up if something doesn't seem right.

Children and young people feel safe in organisations where:

- adults value them
- they know they will be listened to and taken seriously
- they are included in decision-making
- their concerns are acted on
- they can build trust with adults and maintain strong connections with their culture and community.

We also recognise there is an inherent power imbalance between adults, children and young people. That imbalance can be exploited by adults who wish to cause harm. When children and young people are not listened to, they may feel silenced, isolated, or unable to disclose abuse. AHL People must be conscious of this power in relationships and work to rebalance it by creating spaces where children and young people feel heard, respected and empowered.

Certain adult attitudes or behaviours and organisational practices can disempower children and young people. That's why AHL has clear strategies in place to:

- make children and young people aware that we have a responsibility to protect them
- to support children and young people to feel heard and encouraged to raise concerns
- embed cultural identity and belonging in our environments that strengthens the safety and wellbeing of children and young people.

Key Concepts:

Cultural Safety in Environments – Children and young people are only safe when they are culturally safe. This means their identity, kinship and connection to Country are respected and reflected in spaces they live, learn and grow.

Safe Physical Spaces – Physical environments must be designed and managed to reduce risk, support supervision and promote inclusion and wellbeing.

Safe Online Environments – Digital spaces must be monitored and used responsibly. Online safety includes protecting children from grooming, bullying and identity-based harm

Participation and Empowerment – Children and young people must be supported to express their views, make choices and influence the environments they are part of.

Family and Community Engagement – Families and communities are essential partners in creating safe environments. Their voices and cultural knowledge must guide how safety is upheld.

Equity and Inclusion – Environments must be welcoming and accessible to all children and young people, regardless of background, ability or identity.

This chapter covers the environments where children and young people interact with AHL — both physical and online. It sets out practical ways to minimise risks and create inclusive, culturally safe and accessible environments where children and young people feel safe and experience a strong sense of belonging.

Guiding Principles

These principles guide how we embed safeguarding into our environment. They are not just ideals, they are practical commitments that shape our everyday actions.



Children and Young People Know What Feels Safe — We listen to children and young people and adapt environments based on their feedback and lived experience



Cultural Identity is Central to Safety — We embed cultural symbols, language, practices and relationships into our spaces to support belonging and healing



Digital Safety is Cultural Safety — Online environments must be safe, respectful and culturally responsive, especially for First Nations children and young people



Environments Must Be Actively Managed — Risk assessments, supervision, design and feedback loops are essential to maintaining safe spaces



Empowerment is Protection — When children and young people feel confident to speak up, make choices and participate, they are more likely to be safe and thrive



Families and Communities Are Partners — We work alongside families, Elders and communities to shape environments that reflect local priorities and cultural strengths

Creating Environments That Protect, Empower and Include

Safeguarding is not only about policies and procedures, but also about the spaces we create and the relationships we nurture. Children and young people experience safety through their surroundings, their interactions and their sense of belonging. This section explores how AHL designs and maintains environments that are culturally safe, inclusive and empowering for all children and young people, especially First Nations children and young people.

Each of the following plays a vital role in shaping environments where children and young people feel safe, are safe and grow strong in their identity and culture.

First Nations cultural safety and capability — Cultural safety is the foundation of all safeguarding environments. This section outlines how AHL embeds cultural identity, kinship and connection to Country into every space, service and relationship.

Physical and online environments — Children and young people must be and feel safe in every space, whether physical or digital. This section explores how AHL designs, monitors and adapts environments to reduce risk and promote wellbeing.

Children and young people's participation and empowerment — Safety is strengthened when children and young people are heard, respected and involved. This section highlights how AHL supports meaningful participation and empowers young people to shape their environments.

Families and communities — Families and communities are essential partners in safeguarding. This section outlines how AHL engages, informs and collaborates with families and communities to create safe and inclusive environments.

Equity and diversity — Inclusive environments protect all children and young people. This section explains how AHL promotes equity, challenges discrimination and ensures that every child feels valued and supported.

FIRST NATIONS CULTURAL SAFETY AND CAPABILITY

AHL acknowledges the enduring and ongoing connection that First Nations peoples have to land, waters, culture, community, and kin. We recognise the impact of past and present injustices and we commit to actively promoting the safety, wellbeing, and cultural rights of First Nations children, young people and their families in all aspects of our work. We recognise that cultural identity, connection to Country and kinship networks are critical to the safety, wellbeing, and healing of First Nations children, young people and their families.

Cultural safety is the cornerstone of our values, purpose and practice. It is non-negotiable, and we will not tolerate racism in any form. We recognise that children and young people are only safe when they are culturally safe, seen, valued, and supported in their identity as an First Nations person.

This commitment reflects our alignment with the National Agreement on Closing the Gap, which calls for systemic transformation to improve life outcomes for First Nations peoples — including through culturally safe services, community-led solutions, and a strong focus on the rights of children, young people, families and communities.

Cultural safety is also what makes our environments safe and inclusive in practice. When children and young people see their culture respected and reflected in our organisation, when families know their voices shape decisions, and when AHL People act with cultural capability every day, it creates environments where children and young people feel they belong, feel confident to speak up, and are truly safe.

Our commitment to cultural safety is expressed through six (6) key focus areas that guide how we embed it across our work:

1. **Connection to culture, kin and Country** — *Cultural identity, kinship and Country are protective factors that support healing, safety and wellbeing. For First Nations children and young people, feeling connected to who they are and where they come from is inseparable from feeling safe.*

For AHL People this means:

- prioritising cultural identity, kinship and Country in decisions about care and wellbeing
- supporting and celebrating cultural practices and language — e.g. making space for kids to share stories, display artwork, join NAIDOC or local community events
- encouraging connections with kin and community — like making sure children and young people can phone home, attend cultural gatherings, or connect with trusted Elders

How we know we're doing it well:

- Young people say they feel connected to culture and supported to maintain ties with kin and Country.
- Local foods, language, artwork or cultural practices are visible and respected in hostels.
- Elders or community members confirm AHL supports cultural identity and belonging.

- creating hostel environments where culture is visible and valued — through signage in language, local artwork, or safe spaces for cultural practice.

Example:

A young person from remote NT is staying in a Sydney hostel. Staff make sure they're linked in with local mob and Elders for support, and source familiar foods or cultural items from their Country (like bush tucker ingredients, artwork, or music) to help them feel at home. This connection helps them feel less isolated and more grounded in who they are.

2. **Participation and self-determination** — *Children and young people are safest when their voices are heard, respected and acted on — and when their families are supported to lead decisions that affect them.*

For AHL People this means:

- asking children and young people what makes them feel safe and acting on their views
- involving families and kin in key decisions, respecting their authority and cultural role
- providing safe and culturally appropriate ways for children and young people to raise issues or concerns
- recognising that even small choices matter — like letting a young person choose who supports them in a meeting, or how they want to share their views.

How we know we're doing it well:

- Children and young people can point to changes that came from their input.
- Families and kin are actively involved in decision-making about their children.
- AHL People describe how they include children's voices in daily decisions and planning.

Example:

A young person at the hostel notices that the study space feels unwelcoming and distracting. Staff invite them and their peers to help redesign the area – choosing where desks go, adding posters or artwork, and setting up a music-free quiet zone. Their ideas are put into action, and staff explain back: “this space looks the way it does now because of what you told us.” This shows young people their voices directly shape their environment.

3. **Community-led practice** — *Cultural knowledge and community priorities guide our services and policies.*

For AHL People this means:

- partnering with local First Nations organisations, Elders and communities when shaping services
- seeking guidance from cultural leaders on sensitive matters and responding in ways that uphold dignity and cultural integrity
- building ongoing relationships with local communities so hostels are not just “places to stay” but part of the community fabric.

How we know we're doing it well:

- Hostels have regular input from local Elders, Aboriginal organisations or cultural advisors.
- Community voices are visible in how hostel rules, programs or activities are shaped.
- Young people and families say AHL listens to and respects community guidance.

Example:

A hostel worker works with a local Elder or Aboriginal organisation to set up a yarning circle for young people to talk about safety. Elders guide the process so it feels culturally grounded and trusted. Staff then use what is shared to adjust daily routines or activities, showing that community voices directly shape how safety is supported.

4. Culturally capable workforce — Every AHL Person has a role to play in creating culturally safe environments. Cultural capability isn't just training — it's how we show up everyday.

For AHL People this means:

- undertaking and completing training relevant to cultural capability and/or anti-racism to enable culturally responsive, trauma-informed interactions with children, young people and their families
- prioritising cultural safety and trauma-informed practice in recruitment, induction and supervision
- participating in ongoing cultural capability development, grounded in First Nations knowledge systems, to support them to provide culturally responsive care and supervision
- recruiting First Nations workers and valuing lived experience and cultural knowledge in our workforce
- using First Nations knowledge systems and ways of Knowing, Doing and Being to guide how we support children and families
- bringing cultural safety into supervision, induction and daily practice
- challenging racism and unsafe behaviour whenever it is seen.

How we know we're doing it well:

- All AHL People complete cultural capability and anti-racism training and refreshers.
- AHL People report feeling confident to respond in culturally safe and trauma-informed ways.
- Instances of racism or unsafe behaviour are challenged and addressed.

Example:

An AHL Person notice a new staff member struggling with how to respond to a disclosure. A more experienced worker steps in, showing how to listen respectfully, validate the young person, and follow the reporting process. Afterwards, they debrief together about the cultural and trauma-informed aspects of the response.

5. Safe complaint pathways — Children, young people and families must feel safe to raise concerns and be supported throughout the process.

For AHL People this means:

- providing culturally safe, inclusive and trauma-informed accommodation and services
- offering clear, accessible ways for children, young people and families to raise concerns — like suggestion boxes, translated materials, or support from a trusted cultural staff member

How we know we're doing it well:

- Children, young people and families say they know how to raise concerns and feel safe doing so.
- Complaints are responded to quickly, respectfully, and with cultural input where appropriate.
- Feedback shows children and young people trust AHL People to listen and act when issues are raised.

- supporting cultural identity and belonging as protective factors in how we respond
- using culturally mediated or restorative approaches where appropriate to rebuild trust and support healing
- making sure complaints are handled with respect, transparency and community input where appropriate.

Example:

A young person feels uncomfortable with how they were spoken to by staff. They choose to raise it through an anonymous feedback form. The hostel responds promptly, explains what action was taken, and makes sure the young person feels supported and respected throughout the process.

6. Monitoring, evaluation and accountability — *Cultural safety is not a one-off action — it must be measured, reviewed and continually improved.*

For AHL People this means:

- regularly checking how well we're upholding cultural safety across hostels and services
- using feedback from children, young people, families and communities to guide improvements
- involving cultural advisors in reviewing policies and practices to make sure they stay current and appropriate
- documenting changes and showing clearly how community voices shaped them.

How we know we're doing it well:

- Safeguarding and cultural safety reviews are conducted regularly with AHL People, children, young people, families and communities.
- Training and supervision are adapted in response to feedback and incident reviews.
- AHL can show evidence ("you said, we did") of improvements driven by children, young people and community voices.

Example:

AHL runs annual cultural safety reflections where AHL People, staff, Elders and young people share what's working and what isn't. Feedback shows some staff need more support in responding to disclosures in culturally safe ways. Training is updated, supervision is strengthened, and staff report back that they feel more confident and capable in their role.

These commitments are not a one-off statement, they are embedded in how AHL operates, makes decisions, and creates environments where First Nations children and young people feel safe, respected, and strong in who they are.

PHYSICAL AND ONLINE ENVIRONMENTS

AHL monitors, and wherever possible and needed, adapts its physical and online environments to minimise opportunities for abuse to occur.

We acknowledge that it may not always be possible to alter physical environments — for example changing the layout of hostels to improve line of sight. We also understand that it can be difficult to remove risks that can occur in the online environment. However, we can manage risks to the safety and wellbeing of children and young people by adhering to strong policies and procedures that clearly describe what is and what isn't appropriate behaviour both online and in the physical environment.

Physical

Child abuse can occur when the physical environment creates opportunities for an adult to isolate a child without supervision or scrutiny. Opportunities can arise in secluded or unsupervised areas, in situations where children and young people live away from their parents, or at times when children travel with a person in a bus or car or go on overnight trips.

It is expected that AHL People will create and maintain safe and inclusive physical environments by:

- modelling and championing attitudes and behaviours that respect the human rights of all children and young people
- allocating supervision and activities to AHL People who possess the appropriate knowledge and skills to meet the needs of the children and young people they are engaging with. Including, responding to disclosures in an appropriate manner in the event they occur (*see 'Helpful Links and Resources' for guidance on responding to disclosures at the end of this chapter*)
- informing children about their rights and organisational responsibilities to uphold their safety and provide safe and inclusive environments. Including providing or discussing child/young person friendly versions of AHL's policies, procedures and commitment to safety and wellbeing
- setting behavioural standards for AHL People who interact with children and young people
- undertake risk assessments to identify areas where people may have opportunities to interact with children or young people unsupervised (e.g. events, transport) — with higher risk areas (e.g. cars, hostels, offsite activities, change rooms/communal bathrooms managed using specific safety measures (these measures could include keeping log books and audits of physical environments, or doing spot checks)
- where possible altering environments to increase natural lines of sight while maintaining respect for children and young people's privacy
- seeking consent from children and young people (and where required their parent/guardian) to participate in programming/activities or use information, imagery or content involving or developed by them
- seeking information from children and young people regarding what helps them feel and be safe in different environments, and wherever possible actively adapting practice and implementing suggestions to support their safety
- informing children and young people about processes to seek support or raise concerns and complaints
- regularly reviewing and considering the opinions of children and young people, and utilising their opinions to create or alter environments
- Focus particular attention on additional risks and environments that may be closed or isolated.

Online (eSafety)

AHL continues to explore ways to engage with children and young people, including through online platforms. Whilst these platforms have a unique ability to reach and engage with children and young people, we must make sure that we encourage safe use and minimise risks to them.

●●● Aboriginal and Torres Strait Islander young people are high users of digital platforms: 79% of Aboriginal and Torres Strait Islander young people (15–24 years) use social media daily (ABS 2022).

The ever-evolving online environment presents new and unknown risks for children and young people, some of which even their parents and caregivers cannot constantly monitor. Whilst we cannot always keep them safe online, all AHL People have a responsibility to do all that they can to make sure that they are safe and feel safe when they engage with us in this environment. We also have a responsibility wherever possible to make sure that children and young people are aware of new threats and educate them and their families about how to avoid harm and detect signs of online grooming (see *‘Helpful links and resources at the end of this chapter for further information about grooming’*). Therefore, it is important for us to take time to understand new technology, apps and websites that pose a risk to children and young people.

AHL People, children, young people and their families should have access to information about online risks and how to manage them. These risks can include:

- grooming
- sharing of intimate or sexual images
- cyber bullying and other forms of psychological abuse
- meeting in person with people they have spoken to online
- exposure to inappropriate content.

●●● Risk of cyber bullying is higher: Research shows Aboriginal and Torres Strait Islander students are twice as likely to experience cyber bullying compared to non-Indigenous peers (eSafety Commissioner, Youth Digital Participation Survey 2021).

From an First Nations perspective, online safety is also about culture. For many children and young people, digital platforms are vital for staying connected to kin, Country and community — especially when they live away from home. But these spaces can also be where racism, lateral violence and cultural shaming occur. First Nations children and young people are more likely than their peers to experience cyber bullying and race-based abuse online.

●●● Identity-based harm: First Nations young people report higher rates of racism online — e.g. 1 in 3 have experienced race-based hate speech on social media (Reconciliation Australia, Racism and Wellbeing Report 2023).

That’s why online safety at AHL isn’t just about managing risks — it’s also about ensuring cultural safety in digital environments. This means:

- supporting children and young people to use online spaces to connect positively with family, language and culture
- recognising and responding to racism and lateral violence when it occurs online
- working with families, organisations and cultural advisors to guide young people in safe digital practices

●●● Protective factor of culture: Studies show that strong cultural identity and connection to community reduce the harm of online bullying and increase resilience (AIATSIS, Cultural Determinants of Health 2020).

- ensuring that online engagement upholds the same principles of respect, belonging and cultural identity as our physical hostels.

The eSafety Commissioner provides up to date information, resources and training that helps organisations, parents, communities, children and young people stay safe online. They continually scan for new research and policy, as well as legislative and technical updates to make sure their resources, training and information are current and practical. We recommend that all AHL People check the eSafety Commissioner's website regularly to stay up to date with the latest information (*see 'Helpful links and resources' at the end of this chapter*).

Before undertaking any online activities or engagement with children and young people, we must think about the risks and what could go wrong. It is important to consider:

- What could go wrong?
- What could lead to this?
- What will happen if this goes wrong?
- What controls are in place to stop this from happening or to reduce the impact if it does?
- Are these enough?
- What else could be done to stop this from happening or to reduce the impact if it does?
- Who will manage this risk?

It is important all AHL People understand their responsibilities to manage risks to children and young people. Using AHL's risk management strategies (*see Chapter One — Culture*) will support risk assessment and mitigation planning.

Questions we can ask to reflect on how we are creating and maintain safe physical and online environments for children and young people:

- How do we assess and manage risks in the physical and online environments?
- How can we alter the physical environment to increase natural lines of sight and reduce isolated spaces?
- How do we consult with children and young people about their views and perceptions of safety in physical and online environments?
- How do we educate AHL People and parents about behavioural expectations, including online safety?
- How do we educate children and young people about how to stay safe in the online environment?
- How do we balance privacy with the need to provide a safe environment for children and young people?

How we know we're doing it well:

- Opportunities to harm children and young people are reduced or removed.
- Children and young people engage in creative and safe activities.
- Children and young people speak up about risks in physical and online environments.
- Children and young people's privacy is balanced with the need to keep them safe.

CHILDREN AND YOUNG PEOPLE'S PARTICIPATION AND EMPOWERMENT

Children and young people often see safety differently from adults. While adults might think safety is mostly about rules, locks, or supervision, children and young people often describe safety as how they *feel* in their relationships and everyday experiences. Research shows that children and young people feel safe when they are listened to, respected, and know that adults will take their concerns seriously. They can feel unsafe if adults dismiss their views, act unpredictably or don't build trust with them. This means that keeping children and young people safe isn't only about having the right systems in place — it's also about how we interact with them every day and making sure they feel listened to, valued and supported (*see 'Helpful links and resources' at the end of this chapter to learn more about protection through participation research and practical tools*).

We believe that all children and young people have the right to express their views, be listened to, and have their opinions taken seriously in decisions that impact them. They offer unique and valuable perspectives, ideas and expertise based on their own lives, and when their contribution is listened to and acted upon, it can improve the relevance, quality, trustworthiness and impact of our services, programs, activities, and policies.

AHL is a child-centred organisation, and commits to listening, valuing and acting on children and young peoples' views to enhance their safety and wellbeing wherever possible. We actively involve children and young people by creating opportunities for them to meaningfully influence and impact decisions, activities, programs and services that matter to them.

We expect AHL People to actively seek to include the views, voices and experiences of children and young people in the planning, development and delivery of activities, programs, services and operations. We also recognise the importance of working alongside culturally appropriate staff, partner organisations and community members to interpret and respond to their voices in ways that are safe, respectful and grounded in culture.

Involving children and young people can include, but not limited to:

- surveys or consultations to help shape programs or services
- contributing to meetings and events
- participating on boards, committees, youth councils, and advisory groups
- designing, leading or supporting projects
- planning, co-facilitating and/or delivering presentations at conferences, training sessions or workshops
- co-designing services and/or programs.

Questions we can ask to reflect on what we are doing to support child and young person participation

- What opportunities do we offer children and young people so they can give their views and opinions?
- How do we act on feedback given by children and young people?
- How do our colleagues and AHL People demonstrate they understand the importance of children's rights?
- How do we actively support children and young people to develop and sustain friendships?
- How do we include children and young people of all ages, abilities and cultural backgrounds?
- How are children and young people given the skills to understand their feelings so they can describe them to adults?
- Do we discourage children and young people from raising particular subjects?

However, genuine and meaningful participation is more than just a feedback form or a commitment

statement. It's about empowerment through recognising and building on their strengths and enabling them to become stronger and more confident. It gives children and young people greater say and control of their lives and helps them understand their rights so they can act on them if they need to.

By empowering children and young people, we help them to:

- feel valued
- develop knowledge, skills and confidence not only in themselves, but in our AHL People
- have opportunities to inform decision-making
- have independence and choices in their relationships within AHL
- become more resilient
- identify risks and know what to do if they are unsafe
- develop confidence to seek support if they need it
- feel safer and be protected from harm.

When involving children in activities we should consider the nine (9) key principles that will help to put our commitment to child and young person participation into meaningful practice and action:

1. **Have a clear purpose** — everyone should understand why children and young people are involved and have a clear picture of the goals and outcomes you're collectively seeking to achieve.
2. **Include all children and young people** — all children and young people should be given the opportunity to take part, no matter their background or abilities. No one should feel left out or overlooked. Purposefully remove barriers for equal participation and use inclusive methods.
3. **Agree on consent** — children and young people have the right to say 'yes' or 'no' about joining in. Consent is not a one-off decision; it is an ongoing process, and AHL People should actively make sure that children are free to say 'yes' or 'no' to participating throughout any project or activities.
4. **Create safe and comfortable environments** — spaces and activities should protect children and young people's wellbeing, with fair treatment for all.
5. **Share power** — everyone's ideas and opinions matter. Children and young people should be able to help shape decisions, not just have their thoughts noted and forgotten.
6. **Use shared language and communicate openly** — communicate using appropriate language for children and young people. Talk honestly and listen to each other, agreeing on the words and ideas you'll use to describe the work. This way, everyone has a clear understanding of tasks, roles and outcomes.
7. **Support children and young people to participate** — those organising or leading activities should make sure children and young people have the time, tools and help they need to join in fully. This includes working alongside local communities and Elders to understand how to involve children and young people in culturally safe and appropriate ways.
8. **Be transparent and keep children and young people informed** — be honest and clear about how and when children and young people will be involved, including how decisions will be made and how much input they can have. If it is not possible to incorporate everyone's ideas, provide clear reasons and explain how any single viewpoint will be prevented from dominating. Children and young people deserve regular updates on what happens with their ideas and suggestions.
9. **Achieve real benefits** — children and young people should gain something positive — like new skills, confidence, and the chance to make a difference. There should be a clear aspiration for impact.

How we know we're doing it well:

- Children and young people know how AHL People should and shouldn't behave
- Children and young people understand and feel they are listened to and respected
- Children and young people speak up about their safety and the safety of their friends
- Children and young people are aware they can access support services when needed

These principles have been informed by the Voice of the Child toolkit developed by the Murdoch Children's Research Institute. This toolkit alongside other resources such as the Empowerment and Participation handbook developed by the NSW Office of the Children's Guardian provides practical resources that can support the involvement of children and young people (see 'Helpful links and resources' at the end of this chapter for details).

Trauma-informed practice:

When children and young people experience trauma – such as abuse or neglect, the loss of a parent or exposure to violence – it can take a great toll on a child's outlook and affect their sense of safety and security. When people experience trauma they may believe they and their needs don't matter and can feel powerless, particularly when decisions are made without their input.

Empowerment is valuable for children and young people who have experienced trauma. It can help to restore their confidence in themselves and others and assist them to take more control over their lives. We may not know whether the children and young people who engage with AHL have experienced trauma – because of this it is important that efforts to empower all children and young people use a trauma-informed approach. Understanding the impacts of trauma on children and young people will assist us to minimise the likelihood of making these problems worse.

Organisations such as Blue Knot Foundation have helpful information and resources to help understand trauma and trauma-informed practice (see 'Helpful links and resources').

For AHL People, our trauma-informed approach aims to:

- recognise that emotional, physical or sexual abuse – and other adverse life experiences such as racism or violence – can create a trauma
- understand that the impacts of trauma can be significant, especially when trauma occurs at developmentally vulnerable times - and this can greatly affect children and young people's sense of safety and trust
- create culturally, psychologically and physically safe spaces
- work with children and young people in ways that give them opportunities to safely participate and have their say without causing them distress or harm.

FAMILIES AND COMMUNITIES

Children and young people thrive when their families and communities are valued, well supported and understand what will keep their children and young people safe, healthy and happy. For this to happen, we must actively engage with, and be transparent about, our practices, processes, policies and safeguarding responsibilities and approaches with families and communities. This is important as the risk of abuse can increase when organisations are 'closed' or not transparent with parents, carers and families about their processes, governance and behavioural expectations. This is particularly the case in situations where families and the community have an unquestioning respect for the authority of that organisation. Ultimately, the children and young people who engage with AHL will be safer when we include parents, carers and families in our activities and consult them on their children and young people's safety and wellbeing.

AHL is committed to informing families and communities of practices aimed at increasing the safety and wellbeing of children and young people. Additionally, we are committed to implementing practices designed to increase families and communities' knowledge and capacity to promote the safety and wellbeing of children and young people. To do this we expect all AHL People to:

- inform families, community members and stakeholders regarding their rights, and what acceptable and appropriate behaviours can be expected from AHL People. Including providing information about where and how to seek help if concerns arise regarding a child or young person's physical, emotional or online safety
- ensure safeguarding, protection policies and practices are clear and easily accessible either publicly on AHL's website and/or upon request — and make sure these are accessible to everyone regardless of their backgrounds and abilities
- where appropriate partner and collaborate with key external and community stakeholders in program, resources and activity design and delivery. Including local First Nations communities and Elders.
- seek input and feedback from families and communities using various modes of consultation on the effectiveness of programs, activities, resources and opportunities to improve engagement and practices promoting the safety and wellbeing of children and young people.

Questions we can ask to reflect on what we are doing to include families and communities:

- How do we actively involve families and communities in our work?
- How do families and communities know who our leadership team is?
- Are our Safeguarding Behavioural Standards and other child safe policies and procedures accessible to families and community members?
- How does our workforce reflect the diversity within our community?
- How would we include families when responding to a complaint of child abuse?

How we know we're doing it well:

- Families feel welcome
- Families and the community support AHL to be safer for children
- Families and the community are comfortable asking questions on how we prioritise the safety and wellbeing of children and young people.

EQUITY AND DIVERSITY

When an organisation does not respect diversity and promote equity it can create additional risks for children and young people who may already be vulnerable to harm and abuse. Failures to address racism or prejudice also creates risks for some children and young people.

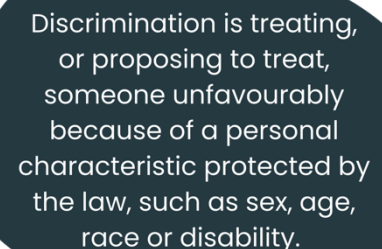
Children and young people with diverse needs, abilities and backgrounds may be particularly vulnerable if they:

- are living with a disability
- come from specific religious backgrounds
- are very young
- have been exposed to trauma
- feel vulnerable because of their gender identity or sexuality
- come from diverse family backgrounds
- live remotely

AHL has zero tolerance to discrimination (both direct and indirect). We strive to create welcoming hostels and environments where all children and young people feel comfortable, and where services are provided in culturally safe and inclusive ways.

AHL People must not take part in or tolerate any form of exclusion, abuse, discrimination, or behaviour which compromises the safety and wellbeing of children and young people. Therefore, all AHL People are expected to:

- model and champion respectful and inclusive attitudes and behaviours that are responsive to diverse needs
- challenge and report any behaviour or attitudes that are discriminatory and compromises the safety and wellbeing of children or young people
- create and maintain an inclusive and accessible environment that promotes equality and diversity, and does not discriminate based on culture, values, beliefs, ethnicity, gender, sexuality, religion, background or disability
- acknowledge the strengths and individual characteristics of children and young people, and embrace all children and young people regardless of their abilities, sex, gender, or social, economic or cultural background
- adapt and respond to children and young people's individual learning and communication styles as well as their life experiences.
- undertake professional development and seek support to develop or enhance their knowledge and skills to effectively create inclusive environments and engage and respond to children and young people with diverse needs
- consult and collaborate with services and communities with relevant expertise to develop programs, resources and activities that effectively engage and meet the needs of children and young people. Where possible, this includes producing child-friendly material in accessible language and formats that inform children and young people of their rights, organisational responsibilities, support options and available complaints processes



Discrimination is treating, or proposing to treat, someone unfavourably because of a personal characteristic protected by the law, such as sex, age, race or disability.

- act in accordance with AHL guidelines and expectations outlined our safeguarding policies, processes, practices and position descriptions
- adhere to federal, state and territory anti-discrimination legislation, requirements and obligations.

Ensuring a welcoming environment is a vital step in meeting the diverse needs of a community and supporting children and young people. AHL creates welcoming environment by:

- having culturally diverse and friendly posters, signage and resources visible
- having information accessible in various formats (e.g. pictures, imagery, flowcharts)
- making sure the physical environment does not pose access difficulties for children and young people with a disability
- engaging with the children and young people, as well as families, on their culture and support needs
- supporting children and young people to access information and support and understand how to report a concern if they need to.

How we know we're doing it well:

- Children and young people with diverse needs speak up about worries and concerns about their safety and the safety of their friends - and AHL People take them seriously and act on them
- Children and young people are not disadvantaged by AHL programs, services and activities
- AHL culture allows children with diverse needs to feel valued
- AHL People recognise and promote the value of diversity and inclusion
- AHL People feel confident working with diverse groups
- There's increased participation of children and young people with disabilities in our programs, services and activities.

HELPFUL LINKS AND RESOURCES

Online safety — eSafety Commissioner:

[First Nations | eSafety Commissioner](#)

[Key topics | eSafety Commissioner](#)

[The eSafety Guide | eSafety Commissioner](#)

Be Deadly Online — Culturally specific resources (videos, posters, lesson plans) developed with Aboriginal communities about safe and respectful online behaviour — [Be Deadly Online | eSafety Commissioner](#)

Online experiences of Aboriginal and Torres Strait Islander children and parents/caregivers — Research on how Aboriginal and Torres Strait Islander children use the internet, the benefits, and the unique risks they face (e.g. racism, lateral violence) — [Online experiences of Aboriginal and Torres Strait Islander children and their parents and caregivers | eSafety Commissioner](#)

Child and young person involvement and participation:

Murdoch Childrens's Research Institute — [Voice of the Child Toolkit — Centre for Community Child Health](#)

Office of the Children's Guardian (NSW) — [Empowerment and Participation: A handbook for organisations working with children and young people](#)

ACU (Tim Moore) Protective Participation – The Voice of Young People on Safety — [Protective Participation: The Voices of Young People on Safety](#)

ACU — Institute of Child Protection Studies report: Our safety counts — [Institute of Child Protection Studies report: Our safety counts](#)

Grooming:

Bravehearts – What is grooming? — [What is Grooming? | Bravehearts](#)

Bravehearts – Online grooming and child sexual exploitation — [Online Grooming & Child Sexual Exploitation | Bravehearts](#)

e-Safety Commissioner — Unsafe contact and grooming (resources for young people) — [Unsafe contact and 'grooming' | eSafety Commissioner](#)

e-Safety Commissioner – Child grooming (resources for parents) — [Child grooming and unwanted contact | eSafety Commissioner](#)

National Office for Child Safety — [Grooming | National Office for Child Safety](#)

Trauma-informed resources:

Blue Knot Foundation — [Blue Knot Foundation](#)

Children and young people's rights:

Australian Human Rights Commission — [Children's rights](#)

Unicef — [Children's version of the Convention on the Rights of the Child | UNICEF](#)

Cultural safety and equity and diversity:

AIFS – Promoting cultural safety and wellbeing for Aboriginal and Torres Strait Islander people – [Promoting cultural safety and wellbeing for Aboriginal and Torres Strait Islander people | Australian Institute of Family Studies](#)

Commission for Children and Young People (VIC) – Understanding cultural safety for Aboriginal children and young people – [Understanding-cultural-safety-CSS1-guide.pdf](#)

Commission for Children and Young People (VIC) – Cultural Safety Tip Sheet – [tipsheet-cultural-safety-aboriginal-children.pdf](#)

National Office for Child Safety, SNAICC & VACCA – Keeping our kids safe: Cultural Safety and the National Principles for Child Safe Organisations – [Keeping our kids safe: Cultural Safety and the National Principles for Child Safe Organisations](#)

Queensland Family and Child Commission (QLD) – The Universal Principle and cultural safety – [Introduction to the Universal Principle and cultural safety | Queensland Family and Child Commission](#)

SNAICC – [SNAICC – National Voice for our Children](#)

Reconciliation Australia – [Home – Reconciliation Australia](#)

Children and Young People with Disability Australia (cyda) – [Home – CYDA](#)

Wear it Purple – [Our Story – WEAR IT PURPLE](#)



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