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ABORIGINAL  
HOSTELS LIMITED

# CHILD AND YOUNG PERSON SAFEGUARDING POLICY

I, Shane Hamilton, Aboriginal Hostels Limited (AHL) Chief Executive Officer (CEO), establish and approve this Policy.

This Policy commences on **11 December 2025**



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<b>Version</b>	<b>Approval</b>	<b>Review due date</b>	<b>Details</b>
1.0	Shane Hamilton, Chief Executive Officer	11 December 2025	Initial release
2.0	[Name, Title]	11 December 2028	Scheduled review

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## INTRODUCTION

Aboriginal Hostels Limited's (AHL's) Child and Young Person Safeguarding Policy articulates our unwavering commitment to safeguarding practices that promote the safety and wellbeing of children and young people who engage with our services. It forms part of AHL's Child Safeguarding Framework and outlines how AHL People must embed the Commonwealth Child Safe Framework, National Principles for Child Safe Organisations, and relevant state and territory legislated child safe standards into everyday processes and practices.

## PURPOSE

The purpose of the policy is to:

- facilitate the prevention of child abuse and neglect occurring within AHL environments
- advance an organisational culture of safety and wellbeing by ensuring that AHL provides an environment 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
- inform all AHL staff, volunteers and contractors of their obligations to act ethically towards children and young people. Including, abiding by their responsibilities to uphold the safety and wellbeing of all children and young people
- inform children, young people, their families and community of AHL's safeguarding responsibility and approach
- promote awareness of AHL's responsibilities to:
  - promote the safety and wellbeing of children and young people
  - mitigate the risk of harm that may come to children and young people from employees, volunteers, representatives, programming or operations
  - respond to any concerns, disclosures, allegations or suspicions of abuse/harm.

## POLICY OWNER

- The Chief Executive Officer is the owner of this Policy

## POLICY SCOPE

The policy applies to all AHL services and activities which involve, result in or relate to contact with children and young people, whether on or off AHL grounds.

This policy 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.

## COMMITMENT STATEMENT

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.

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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.

This policy supports AHL to implement safeguarding practices that consciously and systematically:

- creates an environment 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.

This policy also reflects our alignment with Closing the Gap Priority Reforms, including working in genuine partnership with First Nations people, valuing community-led approaches, and strengthening culturally capable, responsive systems of care across our hostels and services.

### DEFINITIONS

**First Nations** – We respectfully use the collective term *First Nations* to acknowledge the diversity of Aboriginal and Torres Strait Islander 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 (ongoing, non-ongoing and casual), volunteers, external providers/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-focused** – 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.

**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.

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**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.

## ROLES AND RESPONSIBILITIES

AHL leadership must ensure that AHL People:

- are made aware of all organisational policies, procedures, legal requirements and related documents/frameworks that informs practice
- understand and can fulfil their legal and organisational requirements and responsibilities
- model culturally safe and inclusive behaviour in all aspects of leadership, communication and decision-making
- prioritise the cultural capability development of their employees and embed cultural safety expectations in performance planning and supervision.

All AHL People must ensure that they:

- are familiar with, and abide by, all legal obligations and organisational policy and procedural requirements
- seek assistance from their supervisor and/or leadership team members if unsure of how to fulfill their obligations and requirements
- engage in additional professional development as required (as approved by their manager/supervisor) to fulfill their duties
- demonstrate respect for cultural protocols, practices and perspectives in daily interactions and decision-making
- actively support the creation of culturally safe environments where First Nations children and young people feel seen, respected and connected.

## COMPLIANCE AND MONITORING

All AHL People are expected to conduct themselves in a manner consistent with the commitment, responsibilities and obligations set out in this policy and related documents. Any violations of the responsibilities and obligations will be investigated promptly with prompt corrective and/or disciplinary actions taken as necessary. Disciplinary action under the APS Code of Conduct may include termination of employment.

Compliance with this policy and related documents will be monitored through mandatory training, audits, supervision, and feedback mechanisms.

Implementation of this policy will be reviewed in 12 months following its release.

This Policy will be reviewed every 3 years, or sooner if required, to ensure continued effectiveness and alignment with current standards.

## RELATED LEGISLATION AND STANDARDS

- *Children and Young People Act 2008 (ACT)*
- *Working with Vulnerable People (Background Checking) Act 2011 (ACT)*
- *Ombudsman Act 1989 (ACT)*
- *Crimes Act 1900 (ACT/NSW)*
- *Criminal Code 2002 (ACT)*
- *Archives Act 1983 (Cth)*
- *Australian Privacy Principles (Cth)*
- *Commonwealth Child Safe Framework (Cth)*
- *National Principles for Child Safe Organisations (Cth)*
- *Privacy Act 1988 (Cth)*
- *Public Service Act 1999 (PS Act)*
- *Public Service Regulations 1999 (PS Regulations)*
- *Administrative Decisions (Judicial Review) Act 1977*
- *Public Interest Disclosure Act 2013*
- *Work Health and Safety Act 2011*
- *Children and Young Persons (Care and Protection) Act 1998 (NSW)*
- *Child Protection (Working with Children) Act 2012 (NSW)*
- *Children's Guardian Act 2019 (NSW)*
- *Criminal Procedure Act 1986 (NSW)*
- *Care and Protection of Children Act 2007 (NT)*
- *Criminal Code Act 1983 (NT)*
- *Child Protection Act 1999 (QLD)*
- *Child Safe Organisations Act 2024 (QLD)*
- *Working with Children (Risk Management and Screening) Act 2000 (QLD)*
- *The Criminal Code Act 1899 (QLD)*
- *Children and Young People (Safety) Act 2017 (SA)*
- *Child Safety (Prohibited Persons) Act 2016 (SA)*
- *Criminal Law Consolidation Act 1935 (SA)*
- *Children, Young Persons and Their Families Act 1997 (TAS)*
- *Registration to Work with Vulnerable People Act 2013 (TAS)*

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- *Criminal Code Act 1924 (TAS)*
- *Child, Youth and Families Act 2005 (VIC)*
- *Working with Children Act 2005 (VIC)*
- *Child Wellbeing and Safety Act 2005 (VIC)*
- *Crimes Act 1958 (VIC)*
- *Children and Community Services Act 2004 (WA)*
- *Working with Children (Criminal Record Checking) Act 2004 (WA)*
- *Criminal Code Act Compilation Act 1913 (WA).*

### RELATED POLICIES AND RESOURCES

- AHL Child and Young Person's Safeguarding Behavioural Standards
- AHL Child Protection (Mandatory Reporting) Policy
- AHL Safeguarding Handbook
- APS Values and Code of Conduct in practice
- AHL Code of Conduct Guidelines
- Pre-Employment Checks Policy and Guidelines
- Risk Management Policy
- Records and Information Management Policy.

### EXPECTATIONS AND OBLIGATIONS

The expectations and obligations outlined in this policy should be read in conjunction with AHL's Safeguarding Handbook and Child and Young Person Safeguarding Behavioural Standards. These are the core safeguarding resources that will support and guide AHL People to embed the required safeguarding practices.

#### **Children and Young People's Safety and Wellbeing**

Every child and young person has the right to feel and be safe, happy, empowered, and participate in decisions and processes that affect them.

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 top priority. AHL will take any action necessary to enable all children and young people to feel and be safe, and to safeguard them from harm, any form of abuse (including sexual, physical, emotional or psychological), as well as exposure to violence, injury, neglect or exploitation.

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 the 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 practices in accordance with AHL's Safeguarding Framework and related policies, procedures, practices and resources.

This is more than just meeting compliance responsibilities. AHL People have a responsibility to amplify and promote the voices and rights of children and young people, through the prevention, identification and response to child abuse, neglect, and harm. We encourage and expect all AHL People to respectfully

question behaviour that could be considered outside AHL's Safeguarding Behavioural Standards, and related policies, procedures and accepted practices.

### **Child and Young Person Inclusion and Participation**

AHL is a child-centred organisation and commits to listening and acting on children and young people's views to enhance their safety and wellbeing wherever possible.

Every child and young person has the right to be listened to, and their perspectives and experiences taken seriously in decisions that impact them.

All AHL People must take reasonable steps to actively seek to include the views and voices of children and young people in the planning, development and delivery of activities, programs, services and operations and must facilitating appropriate avenues for complaints or concerns.

To interpret and respond to children and young people's voices in ways that are safe, respectful and grounded in culture, importance is placed on a culturally capable AHL workforce, and partnerships with relevant community organisations and members.

It is also expected that AHL People take all reasonable steps to create and maintain safe and inclusive physical and digital environments.

### **Valuing Families and Communities**

Children and young people thrive when their families and communities are valued and well supported. AHL People must develop and maintain strategies that enables families and communities to be informed of our safeguarding approach and practices aimed at increasing the safety and wellbeing of children and young people. Additionally, where possible, AHL People should take reasonable steps to implement practices designed to increase families and communities' knowledge and capacity to promote the safety and wellbeing of children and young people.

### **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 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. We also recognise the impact of past and present injustices, and expect AHL People to actively promote the safety, wellbeing, and cultural rights of First Nations children, young people and their families in all aspects of our work.

Cultural safety is the cornerstone of our practice. It is non-negotiable, and we will not tolerate racism in any form. Children and young people are only safe when they are culturally safe, seen, valued, and supported in their identity as a First Nations person, and AHL People must take all necessary steps to support their cultural safety.

### **Respecting Equity and Diversity**

AHL has zero tolerance to discrimination, both direct and indirect. 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. AHL People must aim 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.

### **Staff Suitability**

AHL recognises that despite best-practice approaches, risks will always exist for children and young people. To assist in preventing harm and mitigating risk as much as possible, AHL is committed to embedding rigorous and consistent child and young person focussed processes to better enable AHL People (working with, or near, children and young people) to be suitable, screened, safe, and supported to uphold the highest standards of safeguarding.

AHL People must 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 engaged. This occurs across the entire selection process from recruitment planning, advertising, selection of appropriate applicants, onboarding, induction, probationary periods and ongoing performance management. Suitability is assessed not just at the point of recruitment, but continuously, through supervision, professional development, and organisational culture. Being suitable to work with children and young people is not a one-off check, it is something we expect AHL People to demonstrate every day, in how they show up, speak up, and support others with care and integrity.

No AHL Person may commence work in a child-related role until all background checks and declarations are satisfactorily completed and verified. Including:

- an assessment of the applicant's responses to application questions including relating to criminal history, misconduct, or exclusion from working with children
- reference checks that include questions about a person's suitability to work with children and young people.
- a satisfactory National Criminal History (Police) Check
- a valid Working with Children Check (or equivalent) for the relevant jurisdiction
- a signed acknowledgment of AHL's APS Values and Code of Conduct, and AHL's Child and Young Person's Safeguarding Behavioural Standards.

All AHL People must complete AHL's Child and Young Person Safeguarding Induction within their first 3 days of employment.

Accountability and continuous improvement are central to our safeguarding processes and practices. Breaches of staff conduct, failure to comply with screening requirements, or concerns about an AHL Person's suitability are addressed through disciplinary and routine reporting.

We are committed to periodically auditing and reviewing our recruitment, screening and induction processes to strengthen safeguards and ensure compliance with evolving best practice and legislative obligations.

### **Child and Young Person Centred Risk-Management and Mitigation**

AHL is committed to proactively identifying, assessing, and mitigating risks to the safety and wellbeing of children and young people across all our environments and services. We recognise that risks to children and young people can arise from physical spaces, online platforms, people, and organisational culture. We understand that failure to manage these risks can result in serious harm, therefore, our approach to risk management is integrated into our governance, operations, and culture across the organisation.

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AHL expects AHL People to contribute to a risk-aware culture through fostering a shared responsibility where the safety and wellbeing of children and young people is everyone's responsibility, and risk awareness 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
- ensuring management accountability and leadership in risk governance.

AHL's enterprise and subsidiary risks relating to child safeguarding are reviewed at least quarterly.

### **Children and Young People Focused Complaint System**

AHL is committed to providing a timely, fair and protective complaints system for safeguarding concerns.

AHL has a responsibility to make sure all children and young people feel safe, heard, and empowered to speak up if they feel uncomfortable, unsafe, exploited or mistreated. We provide multiple, child-friendly ways for concerns to be raised, and ensure that all complaints are treated seriously, respectfully, and without retaliation. We uphold a zero-tolerance policy for retaliation against anyone, especially children and young people, who make a complaint or report a concern.

All concerns, incidents or complaints raised pertaining to a AHL Person's conduct, child or young person harm and/or wellbeing of children and young people must be taken seriously. Responses to any concerns raised must prioritise the safety and wellbeing of the child and/or young person above all else.

To assist in informing children, young people, families and communities of their rights, and our responsibilities and obligations to uphold the safety and wellbeing of children and young people, information is made available publicly online and upon request. This includes our commitment statement, behavioural standards and expectations, and complaint avenues and systems.

It is expected that AHL People 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 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 have developed multiple pathways and support AHL People, children and young people, stakeholders, parents and/or community members to raise concerns or complaints relating to a AHL Person's conduct or matter pertaining to children and young people's safety/wellbeing. AHL is committed to strengthening and embedding accessible and child-friendly reporting channels through providing clear, safe and age-appropriate ways to raise concerns.

We use trauma-informed practices and adjust our approach based on each child or young person's age, abilities, language, and cultural background.

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 and Safeguarding Handbook guidance must be adhered to and where necessary, complaints may be reported to statutory authorities, including police, child protection services or reportable conduct schemes.

Our complaints process is:

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- **timely** – all 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 complaint is investigated.

We are committed to continuously improving our processes and systems to prevent risk of future harm and facilitate more proactive and responsive practices that enhances children and young peoples’ safety and wellbeing. To enable this, AHL People are expected to:

- actively seek feedback from children, young people, their families, and AHL People to review and improve our complaint processes
- conduct regular reviews and audits of how complaints are handled and resolved
- incorporate lessons learned into training, policy reviews, and service improvements.

### **Record Keeping, Data Management, Information Sharing and Privacy Requirements**

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 that considers 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 and retained in accordance with the *Archives Act 1983 (Cth)* and our records and information management policies.

We are committed to embedding data control and management mechanisms that facilitates 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.

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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:

- 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
- with informed consent (where safe and appropriate).

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. Data and record-keeping practices must be regularly reviewed and updated in response to legislative changes, recommendations from incidents, audits, or inquiries, and feedback from children, young people and families.

### POLICY DISTRIBUTION

Through implementation, this policy will be adapted into appropriate resources and made available to children, young people, their families and the community via AHL's:

- [AHL website](#)
- printed welcome/check-in material resources
- displays at hostels (posters/brochures).

The policy and related documents will be directed to the attention of AHL People through:

- all staff email communications
- child safeguarding [Intranet](#) pages
- virtual information/Q&A sessions
- induction and mandatory online training
- refresher training including any face-to-face/facilitated training.

### REVIEW

The policy will be reviewed at least every 3 years to ensure its ongoing relevance and effectiveness, or earlier if required.