



Child Safety Policy

July 2025

1. Purpose

The Department of Infrastructure, Transport, Regional Development, Communication, Sport and the Arts (the Department or DITRDCA) is committed to promoting and maintaining a culture that does not permit or tolerate harm to children, while actively safeguarding the physical, emotional and psychological wellbeing of children and young people. This Policy establishes the Department's expectations of all staff to provide a safe environment for children and manage those risks which arise through the day-to-day work of the Department.

The Child Safety Policy (the Policy) meets requirements set for the Department by the [Commonwealth Child Safe Framework 2nd edition](#) (CCSF) and will be reviewed every two years and following the introduction of new Commonwealth requirements.

The Policy recognises the Department executes its functions across the nation, internationally and within Australia's non-self-governing territories – noting the range of legislative frameworks governing these jurisdictions. The Policy supports, but does not replace, individual responsibility under state and territory legislation, which can be viewed at [Appendix A — Relevant legislation and standards](#).¹

This Policy is guided by the following principles:

- Recognise children's rights and interests
- Build and maintain a child safe culture and environment
- Ensure all staff are aware of and comply with relevant requirements, and
- Provide support and protection to staff who report incidents under this Policy.

If you are unsure about your obligations under this Policy, please speak to your manager or email the Child Safety Officer (CSO) at childsafety@infrastructure.gov.au.

2. Scope

1. This Policy applies to the following:

- Persons who are Australian Public Service (APS) employees in the Department
- Persons employed in the Indian Ocean Territories Administration (IOTA), including under the [Indian Ocean Territories \(IOT\) \(Registered Nurses\) Enterprise Agreement](#) and the [IOT \(Administration\) Enterprise Agreement](#)
- Persons who are employees or officials of other Commonwealth entities whose services are made available to the Department, and

¹ The department intends to further refine this Policy document to capture to more clearly reflect the Australia's non-self-governing territories arrangements. An updated Policy is anticipated to be finalised in early 2026.

- Any person undertaking volunteer or unpaid work on behalf of the Department (referenced as ‘staff’ throughout this Policy).
2. The scope of this Policy also applies to all third parties in a position paid by the Department to deliver services, including contractors, grant recipients, consultants, or advisors.
 3. The Policy recognises the unique operating environment and legislative frameworks within Australia’s external territories and outlines where variations may be required to adhere to these frameworks.
 4. While this Policy applies to all staff, some requirements apply only to persons engaged in child-related work or having access to child-related data, or overseeing third party agreements that involve child-related work. These limited requirements are identified as such throughout the Policy.

3. Definitions

For the purposes of this Policy, the following definitions are used:

Child	Any person under the age of 18 years, or who is reasonably likely to be under 18 if their age cannot be determined.
Child-related work	Work activities which: • Provide access to child-related data • May be reasonably expected to affect children, such as services delivered to families or children, Policy and programs designed for families or children, or materials and publications intended for children, or • Where known or likely contact between a staff member and a child would reasonably be expected as a normal part of the work, and such contact is not occasional or incidental, including: ○ Direct physical contact ○ Face-to-face contact ○ Verbal communications ○ Written communication ○ Electronic and online communication, or ○ Any other contact defined by relevant state or territory Working with Children Checks or Working with Vulnerable People Checks legislation.
Occasional or incidental contact with children	Infrequent contact with children that occurs in the course of employment, but is not part of that staff member’s regular duties. Examples include: • Crossing paths with children in a public space without engaging them • Interacting with children on a singular and brief occasion, whilst in the company of others • Interacting with children escorted by their guardian as a visitor to the workplace.
Staff	All persons covered by the scope of this Policy, including volunteers and unpaid workers.

Third party agreement	A written agreement with an external third-party receiving Commonwealth funding to provide services to the Department, or deliver programs on behalf of the Department. This includes procurement and grant agreements.
Third party contract officer	The staff member responsible for overseeing a third-party agreement. This may include program, grant and contract managers.
Third party provider	An external person or company who provides a service, technology or program to the Department, such as part of a contract or grant agreement.
Working with Children Check	Any Working with Children Checks or Working with Vulnerable People Checks across Australian jurisdictions, regardless of legislated name, are referred to throughout this Policy as WWCC.

4. Responsibilities

Ensuring the safety, welfare and wellbeing of children is the responsibility of all staff. Key responsibilities are outlined in the table below.

Who	Responsibilities
Secretary	- Accountable Authority under the CCSF. - Leads a child safe culture.
Chief Operating Officer	- Policy owner and ensures compliance with the CCSF. - Participates in Chief Operating Officer (COO) Committee considerations for implementing the CCSF.
All Senior Executives	- Provide leadership in promoting a child safe culture. - Demonstrate understanding of and commitment to this Policy. - Ensure child safety is considered when developing risk management plans for any business functions that are associated with children. - Ensure child safety is considered in the design of program and Policy that impacts upon children. - Ensure the appropriate child safety measures are used when approving contracts or grants, or appropriate assurances are included in third party agreements. - Ensure child safety training is completed by staff. - Endorse Divisional responses to the department's annual Child Safety Stocktake questionnaire. - Take immediate action when staff may not be meeting their obligations under this Policy, including provision of feedback to staff and reporting and complaints handling. - Ensure WWCCs have been considered for all positions where there is contact with children, regardless of whether contact is direct or indirect.

Who	Responsibilities
Supervisors	• Provide assurance that lists of WWCC card holders for their branch are managed and maintained, and registrations are valid. • Ensure staff are aware of, and assist them to meet, their obligations under this Policy. • Identify child-related work and recruitment requirements for new roles. • Ensure direct reports complete child safety training relevant to their role. • Ensure child safety, wellbeing and cultural safety considerations are included in Thrive/performance management discussions and goal setting for all staff in child-related positions. • Take immediate action when an employee does not meet their obligations under this Policy, including the provision of feedback to staff, escalation of issues and reporting child-safety concerns. • When recruiting, provide WWCC information to preferred candidates if their role requires a WWCC, and • Verify and check WWCC numbers and validity with the relevant state WWCC authority.
Assurance, Integrity, Risk and Governance (AIRG) Branch	• Assistant Secretary to maintain oversight of child safety complaints within the Department as the Child Safety Officer. • Review the Department's Child Safety Policy every two years. • Complete annual assessments of the Department's child-related roles, child safety risks and mitigation strategies. • Source and maintain child safe training for all staff employed by the Department. • Publish the Department's annual Statement of Compliance with the CCSF. • Maintain a register of Child Safety complaints • Receive, coordinate and escalate reports of suspected serious harm or risk of harm to children from Departmental activities • Assist Indian Ocean Territories Human Resources as requested with referrals for legal information or escalation in relation to specific child safety incident reports.
Indian Ocean Territories Human Resources (IOT HR)	• Provide WWCC information to preferred recruitment candidates (if applicable). • Ensure staff are aware of, and assist them to meet, their obligations under this Policy. • Ensure direct reports complete child safety training where relevant to their role. • Verify an IOTA employee's WWCC on commencement of employment. • Maintain a record of all staff requiring WWCC to show:

Who	Responsibilities
	• WWCC expiry dates • Training completed and/or outstanding • Staff departures • Staff acting arrangements • Provide a copy of WWCC information to People and Capability Branch annually as requested prior to the Child Safety Annual Stocktake. Further information on Screening Agencies is at Appendix C — WWCC application websites. • Receive, coordinate and escalate reports of suspected harm or abuse to children as a result of IOT-related activities.
SES Officers with staff working in Norfolk Island	• Request and seek assurance that staff involved in child-related work undergo a Nationally Coordinated Criminal History Check (NCCHC). For more information see 8.7 Other checks to support WWCC.
Staff involved in contract and grant design or management	• Ensure, where applicable, the appropriate Department of Finance Clause Bank child safety clause is included in Grant Agreement templates and procurement documents. • Monitor and ensure third party providers comply with their child safe obligations. Separate guidance is available in the application of child safe measures in the Quick Reference Guides for: ○ Grants — Commonwealth Child Safe Framework requirements, and ○ Procurement — Commonwealth Child Safe Framework requirements • Grant, Procurement and Contract Managers must consider any assurance required from the grant and contract recipient, in relation to child safe obligations, in the information supplied by them in the annual statement of compliance.
All Staff	• Adhere to the child safe behaviours set out in Appendix B — Child Safe Behaviours • Complete relevant child safety training as required • Comply with relevant conduct and behaviour expectations, such as the APS Code of Conduct for APS employees or IOTA Values and Code of Conduct for IOT employees. • Comply with all relevant requirements of this Policy in the course of their work and any work-related functions (e.g. work events where children may be present). • Comply with all requirements or directions given to them by their manager for the implementation of risk controls. • Comply with applicable state, territory and Commonwealth legislation see Appendix A — Relevant legislation and standards

Who	Responsibilities
	• Report potential risks to childsafety@infrastructure.gov.au, including any breaches of this Policy • Treat any interactions with children, or concerns regarding children with the utmost confidentiality, and in accordance with the Australian Privacy Principles (APPs) • Staff who require a WWCC must comply with the legislative requirements of the relevant jurisdiction, including reporting a change in circumstances to their manager, mandatory reporting requirements and exit of WWCC position. Staff are responsible for obtaining and maintaining their own WWCC qualifications and must advise of any relevant change in circumstance.

5. Cultural safety within the Department

The Department supports collaborative work to promote culturally competent and high-quality practice in the implementation of child safe standards.

Child safety extends beyond the physical environment and includes the safeguarding of every child's right to their own beliefs, culture, customs, and self-expression. Children interacting with the Department shall not experience any assault, challenge or denial of their personal identity and experience.

Child-related programs, services and policies must adopt language that is inclusive, respectful and free from assumption or judgement. Staff engaging with children should be sensitive to how their interactions may affect children with different lived experiences.

The National Office for Child Safety guidance resource [Keeping Our Kids Safe: Cultural Safety and the National Principles for Child Safe Organisations](#) and the Australian Institute of Family Studies resource, *Improving cultural safety: Recommendations for child protection practitioners* | Australian Institute of Family Studies provides practical advice for all staff interacting with children from cultural and linguistically diverse backgrounds including First Nations and Torres Strait Islander peoples.

The Australian Public Service Commission offers the [CALD Compact: Statement of leadership to support cultural diversity](#).

6. Departmental risk assessment and management

The Department will undertake an annual risk assessment in relation to child-related activities to:

- Identify the level of responsibility for, and contact with, children
- Evaluate the risk of harm, and
- Establish appropriate strategies to prevent, minimise and mitigate identified risks.

The annual risk assessment will help inform the Department's Annual Child Safety Statement required under the CCSF.

The Department will identify child protection obligations of third party funded partners in grant and procurement contract and agreement templates. Refer to the Quick Reference Guides on Grants — Commonwealth Child Safe Framework requirements, and Procurement — Commonwealth Child Safe Framework requirements for more information.

6.1 Individual child safety risk assessment

Child safety risks require appropriate consideration and management prior to commencing any child-related activities. WWCCs are just one possible strategy that may be applied in ensuring the protection of children.

Staff responsible for:

- Child-related work
- Recruitment of staff who will have contact with children
- Recruitment of staff under the age of 18
- Planning events or programs that will bring staff in contact with children, including occasional contact, and
- Managing third party contracts that involve children

must assess the risks to child safety on a case-by-case basis in line with the Department's [Risk Management Policy and Framework](#). The level of detail for child-safety risk assessments will be commensurate with the level of risk associated with the activity and will include identifying, managing and controlling risks associated with child safety in the context of the Department.

The National Office for Child Safety (NOCS) has child safety risk management resources available on their [website](#) to assist staff with child safety risk assessment.

7. Recruitment and performance

When recruiting new staff, recruiting managers are responsible for ensuring candidates are appropriately vetted. For positions involving contact with children, this should include the use of targeted selection criteria, mandatory qualifications (if applicable) or specific child-related questions posed to referees as outlined in [Child Safety Fact Sheet 4](#).

In most cases, additional child-safety vetting is at the discretion of the recruiting manager. Such vetting should be considered in consultation with Recruitment at recruitment@infrastructure.gov.au.

Keeping child safety front of mind for relevant recruitment supports due diligence for decision makers and may be applied to employment decisions for any position that is likely to have contact with children. This includes when transferring existing staff to child-related roles or engaging contractors.

Staff with child-related duties should include child safety, wellbeing and cultural safety considerations in performance management discussions and goal setting.

Positions involving frequent or close contact with children may be subject to specific WWCC screening requirements outlined in legislation. These requirements may differ in each jurisdiction. Further details are covered in the next section.

8. Working with Children Checks

8.1 Legislative requirements

Police checks are part of the usual screening process for new staff. However, these checks are not considered to be a sufficient security measure for some types of work that involve frequent or close contact with children. Supervisors of positions with frequent or close contact with children must review the legislative requirements for the jurisdiction in which the relevant duties are undertaken. They must determine whether the position meets the criteria for a WWCC. Legislative criteria for each state can be found in [Appendix C — WWCC application websites](#).

For staff working on Norfolk Island, a WWCC cannot currently be issued on Island. Alternative arrangements for Norfolk Island are outlined in section 8.7.

Any position meeting the legislative criteria must be identified by SES Band 1 officers as a WWCC position.

8.2 Identifying the need for a Working with Children Check

Staff working in regulated industries must obtain a WWCC — [See Appendix C](#).

For all other staff, it is the responsibility of the relevant SES Band 1 to determine if a WWCC is required by an individual delivering services on behalf of the Department. This decision should be based on:

- Whether the staff member engages in child-related work
- Whether the level of interaction with children is more than incidental.

SES Band 1s must be able to provide assurance that lists of all WWCC card holders in their branch are being held, identifying:

- Full name (including first, middle and last name)
- Date of birth
- WWCC registration number
- Verification date (the date you verified them)
- Verification outcome (clearance, barred, interim barred or not found)
- WWCC expiry date
- Jurisdictions of cards held
- Status of worker (APS employee, contractor, volunteer etc)

Emails must be sent to WWCC card holders with reminders to renew their credentials.

SES Band 1s must adhere to individual state and territory legislation in regards to WWCC — [See Appendix A](#).

Where an existing Departmental role does not meet the WWCC eligibility criteria in the state or territory where the role is located, but occasional and/or incidental contact with children occurs, the position owner is not required to obtain or renew WWCC registration. However, a risk assessment should be conducted for instances of contact with children, and mitigation strategies applied.

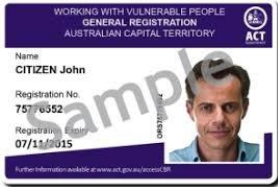
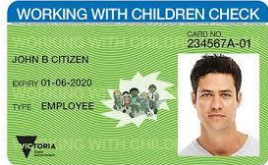
Supervisors of staff under 18 years of age must check legislation for the relevant state or territory where work will be undertaken to confirm whether a WWCC is required. [See Appendix A — Relevant legislation and standards](#).

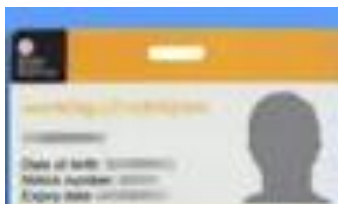
Where a staff member's contact with children permanently changes from frequent or close contact with children, to incidental contact only, this person would not be required to renew their WWCC qualifications unless they resume a role that meets the WWCC requirements within the state or territory in which they work.

8.3 Verifying WWCC cards

Most state and territory jurisdictions will allow WWCCs to be verified online. Table 1.1 below shows an example of a WWCC for each state and territory and web links to verify an individual's WWCC.

Table 1.1

Jurisdiction	Example Card	Link to Verify
ACT		Employers can confirm a WWVP registration is valid by emailing WWVP@act.gov.au. You'll need to provide the registration holder's: • full name • date of birth • WWVP registration number.
NSW		Service NSW
VIC		Victorian Government
QLD		Queensland Government
WA		Western Australian Government

SA		South Australian Government
TAS		Tasmanian Government
NT		SAFE NT

8.4 Applications and staff responsibilities

Staff employed in an identified position will be required to attain a WWCC for each applicable jurisdiction and maintain this qualification throughout their employment in that role. Staff will not be permitted to commence or continue in any role that has direct contact with children if they do not hold a valid WWCC. See [Appendix C — WWCC application websites](#) for more information.

If a WWCC is a mandatory requirement for a position, applicants will be advised by the business area recruiting staff, including any information about mandatory requirements, prior to commencement.

Staff are responsible for ensuring that their personal, contact and position information, held by the relevant state or territory government body responsible for administering their WWCC is correct, including providing updated information to the relevant body when they leave the department.

Staff with WWCC requirements are responsible for ensuring they are familiar with the legislation of the jurisdiction/s in which they will be undertaking child-related work. See [Appendix A — Relevant legislation and standards](#).

Staff are responsible for ensuring they maintain a current WWCC, linked to the Department, and to apply for renewal prior to the nominated expiry date.

Where a staff member's employment contract, or position description, has the WWCC listed as an employment condition and they have not maintained their WWCC, the employee may be seen to have breached their employment contract and subsequently have their employment with the Department subject to review.

If this employment condition has not been expressly stated in writing to the staff member, they may need to work in an alternate role until this essential condition is met.

Where a WWCC is cancelled or suspended, an affected staff member must:

- Notify their supervisor, who will notify the SES Band 1 delegate
- Notify the Australian Government Security Vetting Agency (AGSVA) [by reporting a change in personal circumstance](#), and
- Immediately stop working with children until further notice.

Where a third party WWCC is cancelled, the Department's relevant contract officer must:

- Notify the immediate supervisor who must act in accordance with state and territory legislation
- Ensure third-party individual notifies AGSVA [by reporting a change in personal circumstance](#), and
- Ensure the third-party individual is removed from any work involving children until further notice.

8.5 Third party arrangements

Written agreements with third parties receiving Commonwealth funding for activities that involve children, including grants and procurements, must include child safety considerations. The degree of detail for these measures will depend on the nature of the funded activity. The [National Office for Child Safety](#) provides guidance to Commonwealth Agencies to promote the protection of children in services and activities they fund.

If an approval for a commitment of funds is required, including a grant or procurement, staff must consider child safety issues in the approval process. The Quick Reference Guides for Grants — Commonwealth Child Safe Framework Requirements and Procurement — Commonwealth Child Safe Framework Requirements can be found on CONNECT.

Annual reporting of compliance with child safe requirements, including WWCC or staff training where appropriate, will be required for any third party, their employees and/or sub-contractors, engaging in:

- Services provided directly to children (e.g. education, counselling or health services for children), or
- Activities that involve contact with children that is a usual part of, and more than incidental to, the funded activity (e.g. family or community services where children are likely to be present).

If a funded third party has a required WWCC cancelled or suspended, the relevant contract officer in the Department must be advised immediately and action taken to remove the relevant person/s from contact with children. The contract officer must also notify their supervisor who should advise Recruitment at recruitment@infrastructure.gov.au.

Staff must comply with all requirements set out in the Quick Reference Guides for Grants — Commonwealth Child Safe Framework Requirements and Procurement — Commonwealth Child Safe Framework Requirements where services are directly provided to children and/or activities involving contact with children. This guidance includes child safety clause templates that can be incorporated into new third-party agreements.

8.6 Process to obtain a Working with Children Check

Employees who require a WWCC can apply through an authorised government screening unit in their state or territory.

Staff may seek reimbursement from the Department (or the relevant service stream for IOTA staff) for any expenses incurred as a direct result of applying for a WWCC.

The name of WWCCs varies between each state and territory, however, each jurisdiction has a similar application process. An example is outlined below:

- Apply for a WWCC through the authorised government screening unit for the state or territory where the employee will work.
- Complete the application form
- Provide proof of identity which must include a photo ID with full name and date of birth and a government issued ID
- Police checks may be conducted as part of the application process.

Employees needing a WWCC must wait to receive an authorised card before commencing in any role that has contact with children.

8.7 Other checks to support WWCC

For staff working on Norfolk Island, the Blue Card, which is the Queensland government's equivalent to a WWCC cannot be used on Island. In lieu of this the Department may request staff working on Norfolk Island undergo a [Nationally Coordinated Criminal History Check \(NCCHC\)](#).

A NCCHC is a check that summarises a list of an individual's offender history in Australia. This check may assist in making an informed decision about the suitability of applicants. It may also be referred to as a National Police Certificate or National Police History Check.

Further information about working with children for Department employees and volunteers on Norfolk Island is available [here](#).

8.8 How to store Working with Children Check data

In order to uphold the Department's commitment to child safety and to comply with the Australian Privacy Principles (APP), all data relating to individuals who work with children must be stored securely by the business area, and access restricted to authorised personnel. This data includes information relating to an employee's name, position, training, WWCC expiry date and registration number.

It is the responsibility of the SES Band 1 delegate to maintain, update and store WWCC data, and implement appropriate administrative safeguards to protect it against unauthorised access, disclosure, alteration, or loss.

Access to the data shall be restricted to staff whose roles require it, and access permissions must be regularly reviewed to ensure ongoing compliance with privacy and data protection requirements. Access permissions must be regularly reviewed to ensure ongoing compliance with privacy and data protection requirements.

9. Reporting and complaints handling

9.1 Responsibility to report possible child harm or risk of harm

On 20 March 2020, Commonwealth, state and territory governments introduced failure to report offences for not reporting child abuse concerns. These requirements are in addition to existing state and territory requirements for mandatory reporters (i.e. people employed in schools, hospitals and medical/health care with professional registration requirements) — see [Mandatory Reporting](#)

Any person is lawfully entitled to make a report if they are concerned for a child's welfare, even if they are not required to do so as a mandatory reporter. In addition to the reporting schemes at [Appendix D — Child abuse and neglect reporting schemes](#), staff are expected to uphold the [APS Code of Conduct](#) and [IOTA Values and Code of Conduct](#) by reporting suspected harm to children to childsafety@Infrastructure.gov.au, or alternatively the [Child Safety Feedback and Complaints form](#).

If you are not a mandatory reporter and have concerns about the welfare of a child in connection with activities of the Department, reports can be made by email to the CSO. Alternatively, complaints can be made via the [Child Safety Feedback and Complaints form](#), which allows anonymity if preferred. When a complaint is made

anonymously the Department will not be able to provide a response or follow-up unless contact details are provided.

If reporting suspected harm to children involving a third-party, the relevant contract officer is to be notified. Recruitment, the IOT HR team, or the Norfolk Island Child Welfare Officer will consult with the Financial Management Branch for procurement-related incidents, the Enterprise Grants Management Office (EGMO) for grants-related incidents, and other business areas as required.

Support available:

- Further information on reporting child harm or risk of harm can be found online on the Australian Institute of Family Studies website.
- Dealing with matters of child safety can be very difficult and bring up strong feelings. Staff are encouraged to contact the [TELUS Health Employee Assistance Program EAP](#)

10. Mandatory reporting

Under Commonwealth legislation, *Combatting Child Sexual Exploitation Legislation Amendment Act 2019* all Commonwealth Officers are considered mandatory reporters. Mandatory reporting obligations also extend to particular occupations across Australia's non-self-governing territories (such as education sector employees of all types, cultural and recreation sector employees and those who work in connection with a ward of a hospital or health clinic in which children are ordinarily patients).

10.1 Mandatory reporters

Under Commonwealth legislation, *Combatting Child Sexual Exploitation Legislation Amendment Act 2019* all Commonwealth Officers are considered mandatory reporters. Failure to protect a child at risk of sexual abuse offences and/or failure to report child sexual abuse is an offence. The term 'Commonwealth Officer' is defined broadly in the legislation to include employees, contractors, subcontractors, and persons hired under a labour hire agreement who work for or on behalf of the Commonwealth.

All staff, contractors, subcontractors and persons hired under labour hire agreements have a responsibility to familiarise themselves with the mandatory reporting requirements in the jurisdictions in which they undertake their work and comply with these legislative requirements.

The duty to report applies to suspicions that significant harm or risk of harm is likely to occur in the future, not just suspected cases of significant harm or risk of harm that have already happened.

Criminal offences apply to Commonwealth Officers who exercise care, supervision or authority over children and who fail to protect children from, or fail to report, child sexual abuse.

Incidents of cyberbullying, image-based abuse and/or sharing of illegal and restricted content can be reported to the [eSafety Commissioner](#) through their website. The eSafety Commissioner is an Australian Government agency which promotes safer and more positive online experiences, including safeguarding Australians at risk of online harm.

11 Complaints handling

The Assistant Secretary AIRG branch maintains oversight of complaints within the Department in their capacity as the CSO. They are responsible for escalating complaints within the Department to People Branch and Legal Services, if required. The CSO may escalate urgent matters to law enforcement and/or state and territory child protection agencies.

An overview of the complaints handling process is provided at [Appendix E — Child safety complaints process](#).

Child-friendly information about how to make a complaint, children's rights and responsibilities, and what to expect as part of the Department's handling of a complaint, is available from the Child Safety Resources on the [Department's website](#).

Child safety complaints will be recognised, acknowledged and responded to in line with the Department's [Client Service Charter](#) which supports the public expectations of enquiry and complaint handling and upholds the service standards of the [Australian Public Service Values](#).

Any concerns regarding children must be treated with the utmost confidentiality, and in accordance with the [Australian Privacy Principles \(APPs\)](#).

12 Training

In recognition of the importance of keeping the safety and wellbeing of children at the forefront of work undertaken by the Department, all staff are encouraged to undertake non-mandatory child safety awareness training on induction. Child safety training will be reviewed regularly to ensure relevance for roles involving both direct and indirect child interactions.

All staff are encouraged to complete available cultural awareness and inclusion training as part of their induction and continuous learning. The SBS Inclusion series available on [Learn Hub](#) introduces a variety of cultural and diversity considerations.

Staff employed in roles identified as having regular contact with children, are required to complete child-safe training about how to recognise and report inappropriate behaviour on an annual basis for the duration of their employment in that role. The Child Safety — It's everyone's business training is available on LearnHub. Staff may also be required to complete other training as directed by their supervisor. Child safety training should be an ongoing component of workplace learning for staff in these roles.

Staff employed within IOTA must also comply with any training directions given by the relevant state or territory government for their jurisdiction, as required.

13 Non-compliance with this Policy

All staff are required to adhere to their responsibilities in regard to the application of this Policy. Failure to adhere to any aspect of this Policy may constitute a breach of the APS Code of Conduct or the IOTA Values and Code of Conduct and may result in disciplinary action.

Failure to adhere to relevant WWCC and mandatory reporting legislation requirements under relevant state, territory and Commonwealth legislation may result in penalties to the Department and the employee. See [Appendix A — Relevant legislation and standards](#).

Any incidences of non-compliance should be referred to childsafety@infrastructure.gov.au.

14 Records and recordkeeping

All staff engaging in child-related work are required to keep full and accurate records relevant to child safety and wellbeing.

Records should be created in accordance with the [Privacy Act 1988](#) and the [Department's Records Management Framework](#) about all incidents, responses and decisions affecting child safety and wellbeing, and the records should be maintained appropriately.

Access to sensitive records must be strictly limited to protect privacy and integrity of process. Records of child safety complaints must be stored in accordance with the Archives Act 1983 and any state or territory legislation.

Contact your division or branch executive assistant for assistance in creating a restricted library for sensitive records.

Staff should consult with childsafety@infrastructure.gov.au prior to sharing any Commonwealth records containing information about child safety and wellbeing matters or sharing children's personal information to a third party.

15 Questions and further information

Please contact childsafety@infrastructure.gov.au for any queries in relation to this Policy or the Department's child safety arrangements.

16 Version History

Version	Date	Changes
1.0	August 2023	First approved copy
1.2	July 2025	Updates to approved copy

Appendix A – Relevant legislation and standards

Currently, all states and territories within Australia have their own legislation in place, governing working with children checks, and registration and reporting of child sexual abuse offenders. Details of which are as follows:

Location	Legislation	Source
National	- Commonwealth Combatting Child Sexual Exploitation Legislation Amendment Act 2019 - Family Law Act 1075 (Cth)	Combatting Child Sexual Exploitation Legislation Amendment Act 2019 - Federal Register of Legislation Family Law Act 1975 - Federal Register of Legislation
Australian Capital Territory ²	- Working with Vulnerable People (Background Checking) Act 2011 - Working with Vulnerable People (Background Checking) Regulation 2012 - Working with Vulnerable People (Background Checking) Risk Assessment Guidelines 2018 - Crimes (Child Sex Offenders) Act 2005 - Crimes (Child Sex Offenders) Regulation 2005	https://www.legislation.act.gov.au/
New South Wales	- Child Protection (Working with Children) Act 2012 - Child Protection (Working with Children) Regulation 2013 - Child Protection (Working with Children) Amendment (Statutory Review) Act 2018 - Child Protection (Offenders Registration) Act 2000 - Child Protection (Offenders Registration) Regulation 2015 - Child Protection (Offenders Prohibition Orders) Act 2004 - Child Protection (Offenders Prohibition Orders) Regulation 2018	https://legislation.nsw.gov.au/
Victoria	- Worker Screening Act 2020 - Worker Screening Regulations 2021 - Sex Offenders Registration Act 2004 - Sex Offenders Registration Regulations 2014	www.legislation.vic.gov.au
Queensland ³	- Working with Children (Risk Management and Screening) Act 2000 - Working with Children (Risk Management and Screening) Regulation 2020	https://www.legislation.qld.gov.au/

² Australian Capital Territory laws apply to individuals working in the Jervis Bay Territory.

³ Queensland-state laws apply to individuals working in Norfolk Island.

	• Child Protection (Offender Reporting and Offender Prohibition Order) Act 2004 • Child Protection (Offender Reporting and Offender Prohibition Order) Regulation 2015	
Western Australia ⁴	• Working with Children (Criminal Record Checking) Act 2004 • Working with Children (Criminal Record Checking) Regulations 2005 • Community Protection (Offender Reporting) Act 2004 • Community Protection (Offender Reporting) Regulations 2004 • Working with Children (Criminal Record Checking) Amendment Act 2022. Commencing operation on 1 July 2023 • Children and Community Services Act 2004	https://www.legislation.wa.gov.au/
South Australia	• Child Safety (Prohibited Persons) Act 2016 • Child Safety (Prohibited Persons) Regulations 2019 • Children and Young People (Safety) Act 2017 • Children and Young People (Safety) Regulations 2017 • Child Sex Offenders Registration Act 2006	www.legislation.sa.gov.au
Tasmania	• Registration to Work with Vulnerable People Act 2013 • Registration to Work with Vulnerable People Regulations 2014 • Community Protection (Offender Reporting) Act 2005 • Community Protection (Offender Reporting) Regulations 2016	https://www.legislation.tas.gov.au/
Northern Territory	• Provisions under the Care and Protection of Children Act 2007 Part 3.1: screening for child-related employment • Care and Protection of Children (Screening) Regulations 2010 • Child Protection (Offender Reporting and Registration) Act 2004 • Child Protection (Offender Reporting and Registration) Regulations 2005	https://legislation.nt.gov.au/
Norfolk Island	• Public Sector Act 2022 (Qld)(NI) (as modified by Schedule 10A to the Norfolk Island Applied Laws	www.legislation.gov.au

⁴ Western Australian-state laws apply to individuals working in the Indian Ocean Territories.

	and Service Delivery (Queensland) Ordinance 2021)	
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Note: for a full list of Commonwealth, State and Territory Child protection legislation, outside the scope of this Policy, see [Australian child protection legislation | Australian Institute of Family Studies \(aifs.gov.au\)](#)

Appendix B – Child safe behaviours

People working with children in the Department will ensure they adhere to the following behaviours when performing their duties:

- Treat all children with respect and in a manner that values cultural and linguistic diversity.
- Professionally introduce yourself and show your ID to children and their parent/guardian.
- Wherever possible, ensure that another adult is present when working with or near children.
- Do not use language or behaviour towards children that is inappropriate, assumptive, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Do not use physical or emotional punishment on children.
- Comply with all relevant Australian legislation, including Working with Children Checks and mandatory reporting requirements.
- Never access or use child-related data maintained by the Commonwealth to exploit or harass children.
- Never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium.
- Immediately disclose to the Department all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those that occurred before or during association with the Department.
- Immediately report to your manager concerns or allegations of child exploitation and abuse and failure to comply with this Policy in accordance with appropriate procedures.
- Be aware of your behaviour, and avoid actions or behaviours that could be perceived by others as child exploitation or child abuse.

Appendix C – WWCC application websites

State or Territory	Website
Australian Capital Territory	Access Canberra
New South Wales	NSW Office of the Children's Guardian
Victoria	Working with Children Check Victoria
Queensland	Blue Card Services – Queensland Government
Western Australia	Working with Children Check – Government of Western Australia
South Australia	Screening Unit – Government of South Australia, Department of Human Services
Tasmania	Registration to work with vulnerable people, Tasmanian Government
Northern Territory	Working with Children Clearance, NT.gov.au
Indian Ocean Territories ⁵	Nationally Coordinated Criminal History Check

Note: the majority of these sites also provide fact sheets and training resources

⁵ Non-Commonwealth employees engaged in the Indian Ocean Territories Administration (IOTA), including under the [Indian Ocean Territories \(IOT\) \(Registered Nurses\) Enterprise Agreement](#) and the [IOT \(Administration\) Enterprise Agreement](#) are considered DITRDCSA staff. See section [3 Definitions](#)

Appendix D – Child abuse and neglect reporting schemes

If you believe a child is in immediate danger or there is another **emergency please phone 000**.

Any concerns regarding children must be treated with the utmost confidentiality, [and the Australian Privacy Principles \(APPs\)](#) must be followed.

State or territory	Website	
National	Information: What you can report to eSafety eSafety Commissioner Website: eSafety Commissioner Enquiries: Contact us eSafety Commissioner Concerns related to: • Cyberbullying • Image-based abuse • Illegal and restricted content	
Australian Capital Territory	Website: Report Child Abuse and Neglect - Community Services (act.gov.au) Email: childprotection@act.gov.au Phone: 1300 556 729 Concerns may be related to: • Physical abuse • Emotional abuse, including exposure to family violence) • Sexual abuse, and • Neglect.	
New South Wales	Information: Responding to and Reporting Risk of Abuse and Neglect Website: Online NSW Mandatory Reporter Guide (MRG) What is Mandatory Reporting? (nsw.gov.au) Mandatory reporting is the legislative requirement for selected classes of people to report suspected child abuse and neglect to government authorities.	
Victoria	Website: Mandatory reporting - DFFH Service Providers Mandatory reporting refers to the legal requirement of certain groups of people to report a reasonable belief of child physical or sexual abuse to child protection authorities. To make a report, contact the child protection intake service covering the local government area where the child normally resides. Telephone during business hours Monday to Friday.	
	North Division intake: 1300 598 521	West Division intake – metropolitan: 1300 360452

	South Division intake: 1300 5555266	West Division intake – rural & regional: 1300 360 462
	East Division intake: 1300 360 462	
Queensland	Website: Reporting child abuse If you have a reason to suspect a child in Queensland is experiencing harm, or is at risk of experiencing harm or being neglected, contact Child Safety Services and talk to someone about your concerns.	
	During normal business hours – 1800 177 135	
	After hours and on weekends – contact the Child Safety After Hours Service Centre on 1800 177 135. The service operates 24 hours a day, 7 days a week.	
Western Australia	Website: Child Protection - make the call If you are a doctor, nurse, midwife, teacher, police officer, boarding supervisor or minister of religion, you can lodge a verbal mandatory report by calling the Department of Communities - Child Protection and Family Support's Mandatory Reporting Service on free call 1800 273 889. By law, you must also lodge a written report. Provide as much information as possible, as this will assist with the assessment of the child's safety.	
South Australia	Website: Report child abuse or neglect Department for Child Protection To report/notify suspicion that a child or young person is, or may be, at risk of harm, call the child abuse report line (CARL): 13 14 78 All serious concerns must be reported/notified via the CARL telephone report line and not via the e-CARL online reporting system. Serious concerns include when you suspect a child or infant is in imminent or immediate danger of: serious harm; serious injury; chronic neglect; when the concerns are for an infant under 12 months old; or when the concerns are for a child or young person who is in the care of the Department.	
Tasmania	Website: Children, Youth and Families - The Department for Education, Children and Young People Tasmania (decyp.tas.gov.au) To have a conversation about your concerns for the safety or wellbeing of a child, contact the Advice and Referral Line on 1800 000 123.	

Northern Territory	Website: Report child abuse NT.GOV.AU Website: Protect your child from sexual abuse – mandatory reporting In the Northern Territory you must report your concerns if you believe a child is being, or has been, harmed or abused. In an emergency, call 000 and ask for police. If not an emergency, call Police 131 444 The child protection reporting line: 1800 700 250 (24 hours a day, 7 days pw) Crime Stoppers on 1800 333 000
External Australian Territories	<u>Indian Ocean Territories:</u> In an emergency: Call 000 Website: Submit a Mandatory Report of child abuse through the WA Government mandatory reporting portal Email: The Department's Indian Ocean Territories HR Team at IOTHRTeam@infrastructure.gov.au Mandatory Process Diagram IOT <u>Norfolk Island:</u> In an emergency: Call 000 Website: To make a report complete the Mandatory Reporting Form on NI-Connect Email: Norfolk Island Child Welfare Officer (CWO) at: childwelfareofficer@keyassets.com.au Mandatory Process Diagram <u>Jervis Bay:</u> In an emergency: Call 000 Website: ACT Child and Youth Protection Services' online form Mandatory Process Diagram

Appendix E – Child safety complaints process

1. Overview

The Department has a robust complaint handling process in place to receive, record, manage, resolve and report on complaints. This appendix extends on the complaints process for child-safety related complaints only.

The eSafety Commissioner requires all serious online abuse to be reported. eSafety helps Australians prevent and deal with harm caused by serious online abuse or illegal and restricted online content. This includes:

- cyberbullying of a child or young person (under 18)
- adult cyber abuse (18 years and older)
- image-based abuse (sharing, or threatening to share, an intimate image or video without the consent of the person shown).

A complaint can be made directly to eSafety via their [website](#). Furthermore, the Australian Signals Directorate through the Australian Cyber Security Centre facilitates the reporting of a cybercrime, incident or vulnerability. This is a national policing initiative with the online reporting mechanism available at [ReportCyber](#).

Any concerns regarding children must be treated with the utmost confidentiality, and [Australian Privacy Principles \(APPs\)](#) and applicable state and territory privacy legislation must be followed.

A child-safety related complaint may be any concern raised which relates to:

- Actual or perceived mistreatment of a child or children by a person associated with the delivery of Department services, including from another child, volunteer or third party contractor.
- Inappropriate conduct by a person associated with the delivery of Department services that may pose a risk to children, including lack or loss of a required working with children check
- A physical, environmental or online risk to the safety, health or well-being of children, within the remit of the Department
- An issue with child-safety materials published by this Department, including the Child Safety Policy and webpage
- Any matter covered by the Child Safety Policy.

2. Receiving the complaint

Complaints or concerns regarding child safety can be sent to:

- The COS at childsafety@infrastructure.gov.au, or
- The [Child Safety Feedback and Complaints form](#), available publicly on the Department's website. This method allows anonymity for reporters who do not wish to be identified.
 - any person submitting a child safety complaint using the web form will see an acknowledgement page directly after submission. The page will give the complainant a reference number for the complaint. This number can be used by the complainant in the event they choose to remain anonymous.
 - An automatic email will also be sent to the nominated email address if provided. The email gives an overview of the information provided, and provides the reference number of the complaint.

The Department's '[Contact Us](#)' page includes a commitment to child safety and wellbeing, directing users to the appropriate page for child-friendly information on submitting a complaint and the web form.

3. Recording the complaint

Only staff with a need to know will be able to access details of complaints. They will treat information received with the utmost confidentiality. Details will be stored in a restricted library in accordance with the [Australian Privacy Principles \(APPs\)](#) to enable effective record-keeping, analysis and investigation of each complaint. For example:

- Name and contact details (if provided)
- Email address
- The type of complaint or concern
- Details about the subject of the complaint or concern
- Any additional communications, advice received or support provided during the investigation process
- How the complaint was resolved or investigated (once this is progressed)
- Details of any risks managed, and how they were managed
- The complaint outcome

Aggregate and de-identified data may be shared for reporting purposes.

4. Acknowledging complaints

An automatic reply will be sent to complaints lodged through the [Child Safety Feedback and Complaints form](#).

Complaints submitted via the childsafety@infrastructure.gov.au email will be acknowledged on receipt with a response provided using the preferred communication method nominated by the complainant. This will include:

- Contact details for the complainant to use for further communication
- Any questions necessary to provide clarity and progress the complaint further if desired
- Confirmation of any reasonable adjustments required, and
- Information about the complaint-handling process, the likely next steps, and the expected timeframe.

5. Assessment of the complaint

An initial assessment of complaints will determine next steps required for progression and identify immediate risks.

In an emergency, Police are to be contacted in the first instance, and the incident referred to the Child Safety Officer secondly.

If the complaint or concern is not about anything that this Department can respond to, the complainant will be informed, and (if possible) referred to a person or organisation that can help as quickly as possible.

6. Planning the involvement of a child or young person

Involvement of any affected child or young person and their parent or carer at key stages of the complaint process will be carefully planned, including when and how information will be communicated to them throughout the process, and how they will be supported.

A rationale for all decisions made in relation to direct involvement of a child or young person will be recorded, with communication established with the child or young person and the contact person as early as practicable.

7. Resolving complaints

Assistant Secretary AIRG Branch will consult relevant areas of the Department, or seek external advice when required, to effectively resolve complaints.

Serious concerns will be reported to child protection authorities where required under state/territory legislation. Where possible, and safe to do so, the complainant will be advised and offered support. In the instance a complaint is escalated, the Child Safety officer must be notified.

Complainants will receive ongoing contact from the Department throughout the handling of their complaint.

All complaints handled will receive notice of resolution, which will include avenues available for further assistance should the complainant be unsatisfied with the outcome.

8. Feedback and review of this process

Feedback received on the complaints process is welcomed and will be considered as received, with this process reviewed formally on an annual basis.