

1. Purpose

This policy explains how Affinity Education Group (Affinity) creates and maintains a child safe organisation. It establishes the principles, governance arrangements and organisational expectations that support the safety, wellbeing and participation of all children.

This policy supports Affinity's commitment to the National Principles for Child Safe Organisations, state and territory Child Safe Standards, and the United Nations Convention on the Rights of the Child

2. Scope

This policy applies to:

- Board members
- Executive leaders
- Centre Support Office employees
- Centre-based employees
- Volunteers
- Students
- Contractors
- Families and visitors interacting with Affinity services

This policy applies across all Affinity services, programs, operations and environments, including physical and online settings. This policy must be read with:

- [POL2-P5 Child Safety and Protection Procedure](#)
- [POL 2-P33 Safe Use of Digital Technologies - Electronic Devices](#)
- [POL6-P6 Complaints Policy and Procedure](#)
- [POL 2-P24 Incident Injury Trauma and Illness Policy and Procedure](#)
- [POL 4-P9 Recruitment and Onboarding Policy and Procedure](#)

3. Definitions

The following definitions support consistent understanding of the terms used in this policy.

Term	Definition
Child Safe Organisation	An organisation that creates a culture, adopts strategies and takes action to prevent harm to children and promote their safety, wellbeing and rights.
Child Safety	Measures that protect children from abuse, neglect, exploitation, harm and inappropriate conduct.
Paramountcy Principle	The principle that children's safety, rights and best interests are the primary consideration in all decisions affecting children.
Child Participation	The meaningful involvement of children in decisions affecting them, consistent with their age, development and capabilities.
Cultural Safety	An environment where children feel respected, valued and safe to express their identity, culture and beliefs.

4. Guiding principles

At Affinity, we believe that child safety is everyone's responsibility. We are committed to upholding the safety, rights and wellbeing of all children and promote a culture of child safety with a zero-tolerance approach to child abuse and harm.

Affinity ensures the Paramountcy Principle is applied in all aspects of our work. All decisions and actions relate to the operation and delivery of education and care services must prioritise children's safety, rights and best interests above all other considerations.

The following principles guide all child-safe practices across Affinity:

- **Children's safety, rights and wellbeing come first** - Children's safety, wellbeing and best interests are prioritised in all decisions, actions and service delivery.
- **Children are respected and heard** - Children are recognised as capable participants whose views, experiences and perspectives inform decisions affecting them.
- **Inclusion strengthens safety** - Safe environments recognise and respect diversity and promote equity, participation and belonging for every child.
- **Families and communities are valued partners** - Families and communities contribute to and support child safe practices through open communication and meaningful engagement.
- **Safety requires capable people and effective systems** - Child safety is reinforced through recruitment, training, leadership, governance, risk management and continuous improvement.
- **Continuous improvement supports safer outcomes** - Affinity regularly monitors, reviews and strengthens child safety systems, practices and culture.

Accountable (Owner)	Chief Risk and Quality Officer	Accountable (Expert)	National Quality Manager
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5. Child Safe Organisation Framework

Ensure child safety and wellbeing are embedded across governance, leadership, culture, operations and service delivery so that all children experience safe, inclusive and supportive environments.

Affinity implements a child safe framework aligned with the National Principles for Child Safe Organisations. Affinity implements and is committed to complying with a child safe framework aligned with the National Principles for Child Safe Organisations. These 10 national principles provide a consistent approach to creating safe cultures, environments and practices that protect and safeguard children in child-related organisations. Some states and territories apply the principles as 10 state-based Child Safe Standards (and 11 Child Safe Standards in Victoria) that child-related organisations must commit to.

Key expectations

- Child safety and wellbeing are embedded within organisational governance, leadership and culture.
- Children are informed about their rights and actively participate in decisions affecting them.
- Families and communities are involved in promoting child safety and wellbeing.
- Diversity, equity and inclusion are reflected in organisational practices.
- Child safety risks are systematically identified, managed and reviewed.
- Organisational systems support reporting, learning and continuous improvement.

6. National Principles

Principle 1 - Child safety and wellbeing is embedded in organisational leadership, governance and culture

• All levels of AEG leadership are committed to and advocate for the safety and wellbeing of all children including those more vulnerable such as Aboriginal and Torres Strait Islander children, children from linguistic and culturally diverse backgrounds and children with disabilities; upholding children's rights to safe environments and promoting a child safe culture. • AEG understand that child safety is everyone's responsibility and take a zero-tolerance approach to child abuse and harm. • Employees at all levels must complete mandatory Critical Policies training annually through the Learning Hub, including the review of the policy and procedure strategies on commencement of employment with the organisation. This is refreshed and discussed during regular team meetings and network wide meetings. • Employees must also complete and maintain National Child Safety Training and National Child Protection Training requirements. • All stakeholders have access to current policies, procedures, Code of Conduct and risk assessments via Promapp (for employees) and via QR codes and risk assessment folders (for families, visitors and volunteers). • Child safe principles are embedded within risk assessment and decision-making processes to promote the safety, wellbeing and best interests of children. • Recruitment practices, position descriptions and induction processes outline child safe practices and obligations for centre-based employees and volunteers. • Providing inclusive and culturally safe environments for all including those of Aboriginal and Torres Strait Islander background is embedded through intentional programming, inclusive environments and daily practice. The company Reconciliation Action Plan endorsed by Reconciliation Australia further supports this commitment to cultural safety. • Policy review and continuous improvement activities are guided by child paramountcy principles, ensuring children's rights, safety, wellbeing and best interests remain the primary consideration in organisational decision-making and practice development.	POL7-P1 Governance and Management Policy and Procedure POL HR5 AEG Code of Conduct GUI 1390 Enterprise Risk Management Framework POL 4-P9 Recruitment and Onboarding Policy and Procedure POL4-P10 Onboarding and Induction Procedure POL6-P4 Equity and Inclusion Procedure POL 3-P4 Risk Assessment Procedure POL7-P8 Policy Governance, Compliance and Review Procedure
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Principle 2 - Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

• Statements of children's rights, in child-friendly versions, are available and used to share and promote awareness of children's rights. UNCRC Child friendly • All children have the right to quality early learning where their rights, identities, cultures and needs are upheld and respected. • Evidence-informed practices including Primary Caregiving, Abecedarian Approach and Project Based Learning, relevant to different age groups are embedded which promote respect for children and encourages child agency and decision making. • Staff assess children's learning and development against developmental progress records and approved learning outcomes to ensure children are seen, listened to and responded to as	POL1-P1 Pedagogy and Practice Procedure POL2-P5 Child Safety and Protection Procedure POL5-P1 Interactions with Children Policy and Procedure
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individuals. Children's voices, strengths and needs inform planning and decision-making ensuring practices are responsive to children's choices and agency. - Children are encouraged and given opportunity to express their thoughts and ideas and staff listen and respond to their communication. - Children are consulted about care practices, play, environments and interactions and their choices are respected.	
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Principle 3 - Families and communities are informed, and involved in promoting child safety and wellbeing

- The organisation encourages input from families and communities into decisions that affect the care their child/ren receive. - Families and communities are encouraged to provide input on scheduled policy reviews or reviews as a result of changing legislation or recommendation. - The organisation shares information with families and communities about child safety and wellbeing, developmental information, family matters and other health and safety matters and seeks their views on the same. - Families and communities are aware of who to address questions, concerns or complaints to and complaints are addressed promptly and professionally, following a clear process. - Centre and Operation Teams develop collaborative partnerships with families and communities, providing opportunities for children and families to share their views on child safety and protection, child development, child-rearing practices, family culture and heritage, language, traditions and lifestyles and respect this input.	POL6-P3 Family Engagement Procedure POL6-P7 Family Code of Conduct Procedure POL7-P8 Policy Governance, Compliance and Review Procedure
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Principle 4 - Equity is upheld and diverse needs respected in policy and practice.

- Affinity's Commitment to Child Safety is available and communicated with children, in child-friendly language. - Staff and volunteers value and respect children's uniqueness and acknowledge individual strengths, characteristics, cultures and abilities and demonstrate this respect through interactions, environments and programs. - Staff and volunteers are familiar with equity and inclusion principles as outlined in Equity and Inclusion procedure and have the opportunity to provide feedback and input. - Staff and volunteers have support available in responding to children and families with diverse needs. - Bias and prejudice are challenged through critical reflection and professional development regarding equity and cultural diversity. - All levels of Affinity leadership are committed to, and advocate for, the safety and wellbeing all children including those more vulnerable such as Aboriginal and Torres Strait Islander children, children from linguistic and culturally diverse backgrounds and children with disabilities; - Affinity is committed to upholding children's rights by creating safe environments and promoting a strong child safe culture. We ensure that support, feedback and complaints processes are culturally safe, responsive, accessible, and communicated in ways that are easy for children, families and communities to understand.	POL6-P4 Equity and Inclusion Procedure POL5-P2 Supporting Behaviours Procedure POL6-P6 Complaints Policy and Procedure
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Principle 5 - People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice

- The organisation has robust recruitment and onboarding processes including reference checks and pre-employment screening as well as Working with Children Check validity. All workers are registered in the National Early Childhood Worker Register with their identification, checks and qualifications. Refer to Recruitment and Onboarding Procedure. - To help keep children safe, educators and staff must tell Affinity in writing if anything changes that may affect their suitability to work with children. This includes: - receiving any negative notice (including Prohibition, Enforceable Undertaking, Suspension or Supervision), or - any change to teacher registration or accreditation. - This information must be shared promptly — within 72 hours of the change, or within 24 hours of becoming aware of it, whichever comes first and reported as required. - Affinity will regularly review and verify staff's WWCC through Quality and Compliance Audits and routinely in centres. - Affinity will regularly conduct prohibition checks for all staff. - All employees must complete both the National Child Safety training and Child Protection training including the review of the policy and procedure strategies on commencement of employment with the organisation. This is refreshed and discussed at regular team meetings and network wide meetings.	POL 4-P9 Recruitment and Onboarding Policy and Procedure POL 7-P16 Suitability, Criminal Record and Background Checks Procedure POL 4-P10 Onboarding and Induction Procedure POL 2-P24 Incident Injury Trauma and Illness Policy and Procedure
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- Individual development plans are linked to training opportunities which include child safety and wellbeing.
- Online process management system articulates clear processes, procedures and risk assessments, for monitoring and minimising risk to child safety and wellbeing.
- Managers monitor validity and currency of Working with Children Checks. Employees report to their manager if their WWCC is cancelled or suspended or if they are convicted of an indictable offence. If/when details change for a worker this will be updated in the National Early Childhood Worker Register.

Principle 6 - Processes to respond to complaints and concerns are child focused.

- Staff are trained in responding to children and young people at risk of harm. Volunteers and trainees are supported and supervised by trained staff and will not be left alone with children at any time.
- Policies and procedures are available that outline how to respond to and report complaints, allegations and concerns to relevant authorities including departments responsible for child safety and following Reportable Conduct Schemes. Internal complaints processes are handled by trained People and Culture specialists and the Compliance and Safety team.
- Complaints and concerns from children and young people will be listened to, documented, taken seriously and followed up. Feedback will be provided to children and young people regarding their concern. The child will be encouraged to have a support person present through any complaints process.
- Privacy and confidentiality will be maintained, however reporting obligations will be followed and may involve sharing information about the complaint or concern with recognised authorities.

[POL6-P6 Complaints Policy and Procedure](#)
[POL 2-P24 Incident Injury Trauma and Illness Policy and Procedure](#)
[POL2-P5 Child Safety and Protection Procedure](#)
[POL5-P1 Interactions with Children Policy and Procedure](#)
[POL6-P5 Confidentiality and Privacy Procedure](#)

Principle 7 - Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

- Staff complete accredited training in Identifying and Responding to Children and Young People at Risk of Harm, or equivalent, as part of their qualification requirements for their job role.
- All employees complete both the National Child Safety training and National Child Protection training (where required per jurisdiction), including review of the policy and procedure strategies for identifying, responding to and reporting actual or potential child safety issues. Centre-based staff refresh this knowledge during team meetings, at least twice annually.
- All staff and volunteers complete a site induction in which location and implementation of policies and procedures, and risk assessments and critical safety procedures are discussed.
- Volunteers and trainees are required to complete the National Child Safety training and evidence retained in the National Early Childhood Worker Register and always supervised and supported by trained staff and will not be independently responsible for responding to and reporting potential actual or potential child safety issues however will be supported by the Nominated Supervisor to raise and report.
- Nominated Supervisors and Responsible Persons complete specialised Nominated Supervisor and Responsible Person Roles training on the Learning Hub.
- The organisation will provide updated information and training to staff and volunteers. Re-induction is encouraged to support the regular mandatory training.
- The organisations online learning platform contains safety related modules as well as a dedicated National Principles for Child Safe Organisations program.

[POL 4-P10 Onboarding and Induction Procedure](#)
[POL 2-P28 External Visitor Procedure](#)
[POL4-P1 Day to Day Charge Procedure](#)

Principle 8 - Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

- Risk assessment and minimisation plans are completed for all physical environments, activities, events and online safety. Children are encouraged, where developmentally capable, to contribute to the identification of hazards and development and implementation of safety measures.
- Policies, procedures and processes are communicated and enforced which contribute to providing physically, culturally and psychologically safe environments for children, including child safety and reportable conduct.
- Staff are trained in risk management including identifying hazards and assessing and managing risks in the physical and online environment. Ongoing review ensures the risks remain managed.
- The organisation engages with approved contractors and service providers with valid WWCC where required, however even though approved, they are never left alone with a child or group of children.
- All workers are registered in the National Early Childhood Worker Register with their identification, checks and qualifications uploaded as evidence upon attendance to the centre.
- Online safety is promoted with children and families. Children engage in online activities for planned purposes and are not left unsupervised. Devices used have appropriate password

[POL 2-P33 Safe Use of Digital Technologies - Electronic Devices](#)
[POL3-P1 Providing a Child Safe Environment Policy and Procedure](#)
[POL 2-P28 External Visitor Procedure](#)
[POL2-P5 Child Safety and Protection Procedure](#)
[POL 3-P4 Risk Assessment Procedure](#)

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protection and child-appropriate content. [POL 2-P33 Safe Use of Digital Technologies - Electronic Devices](#) further outlines Affinity's commitment to online safety.

- Where activities are presented via Zoom, educators follow documentation and reporting obligations if they suspect on reasonable grounds that they witness harm or potential harm in the child's home environment.

Principle 9 - Implementation of the national child safe principles is regularly reviewed and improved.

- The organisation will review this policy statement and procedure and other procedures related to child safety and wellbeing at least annually, and more frequently if required. The organisation will seek input from staff, children, families and community in the reviews.
- National Principles for Child Safe Organisations online program including an introduction module and 10 principle modules is available and promoted to all employees through the Learning Hub.
- Child related incidents are analysed and reported on and strategies identified to improve outcomes for children and training and improved performance for staff.
- The organisation has professional partnerships with early childhood peak bodies and works to understand trends and actions to minimise risk.
- Centre Support teams monitor in-centre practices, support capability development through coaching and guidance, and identify opportunities for improvement.
- Working parties made up of cross-functional organisation members collaborate on the development, implementation and review of focus topics
- Policies and procedures are in place for undertaking regular and service specific child protection risk assessments. These assessments should identify potential risks to children's safety and wellbeing and outline control measures to mitigate those risks across physical environments, routines, excursions, and online or communication practices.

[POL6-P6 Complaints Policy and Procedure](#)
[POL 2-P24 Incident Injury Trauma and Illness Policy and Procedure](#)
[POL2-P5 Child Safety and Protection Procedure](#)
[POL 3-P4 Risk Assessment Procedure](#)

Principle 10 - Policies and procedures document how the organisation is safe for children and young people.

- The organisation provides consistent policies and procedures across the network, categorised by the National Quality Standards to ensure they are child and practice-focused. Refer to the POLICY INDEX for policies and procedures relevant to child safety and wellbeing.
- Policies and procedures are interpreted via an online process management system. Processes are clearly articulated and available to all staff to ensure effective, consistent and compliant practices across the network.
- The completion of online review of Critical Policies form part of induction requirements.
- Policies and procedures are available to all centre users to be sure that all are aware of responsibilities, understand acceptable behaviour and reduce the risk of breaches and to highlight the organisation's commitment to safety.
- All stakeholders can have input in the development and review of policies and procedures.
- The organisation develops training around the implementation of critical policies and risk management
- The National Policy Committee meets regularly to conduct policy reviews against best practice and changes in legislation and communication and implementation of changes or updates to documents.
- Policies, procedures, processes and initiatives have been externally audited to ensure the organisation is best positioned to provide safety for children and young people.

[POL7-P8 Policy Governance, Compliance and Review Procedure](#)

Victorian Principle 11 - Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued

- The organisation encourages and supports Aboriginal children, young people and families to express and enjoy their culture and cultural rights and encourage their full participation and inclusion.
- The organisation recognises and appreciates the significance of Aboriginal culture and promotes the importance of the wellbeing and safety of Aboriginal children.
- The organisation has policies, procedures and processes to provide a culturally safe and inclusive environment and to identify instances of racism and actively take a zero-tolerance approach.
- The organisation has a Reconciliation Action Working Group made up of cross-functional members to collaborate Reconciliation and respectful, meaningful and inclusive practice across the network.
- Services develop individual Reconciliation Action Plans with Narragunnawali that promote cultural safety and understanding within their centre community.

[POL2-P5 Child Safety and Protection Procedure](#)

Escalation and Support

Any concern regarding:

- child abuse;

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- child protection;
- reportable conduct;
- breaches of child safe requirements;
- unsafe environments; or
- organisational non-compliance,

must be escalated immediately through Affinity's child protection, incident management, reportable conduct and complaints management processes. These matters must not be managed solely at a local level where a child may be at risk.

7. Roles and responsibilities summary

The following table provides a summary of role responsibilities that align with the procedures and ProMapp processes referenced.

Role	Responsibilities
Approved Provider (Affinity)	• Ensure the organisation provides a child safe environment where children's safety, wellbeing and rights are paramount. • Establish and maintain governance systems, policies, procedures and resources that support compliance with Child Safe Standards and National Principles. • Promote a child safe culture across all services and operations. • Monitor child safety risks, incidents, complaints, reportable conduct matters and continuous improvement activities. • Ensure effective systems for recruitment, training, supervision, reporting and risk management are implemented and maintained
Centre Managers, Nominated Supervisor	• Implement child safe policies and procedures within services. • Foster a child safe culture and ensure children's rights are upheld. • Supervise employees, students, volunteers, visitors and contractors. • Ensure concerns, incidents and complaints are reported and escalated appropriately. • Monitor compliance with training, Working with Children Checks and risk management requirements. • Engage families and communities in promoting child safety and wellbeing
Employees, Educators, Students, Volunteers and contractors	• Prioritise children's safety, wellbeing, rights and best interests in all decisions and actions. • Comply with all child safety, child protection and reporting obligations. • Complete mandatory training and maintain required clearances and registrations. • Identify, report and respond appropriately to concerns regarding child safety and wellbeing. • Support children's participation, inclusion, cultural safety and voice. • Maintain professional behaviour consistent with the Code of Conduct
Families and Communities	• Encouraged to partner with Affinity to support and promote child safety and wellbeing
All Stakeholders	• Share responsibility for creating and maintaining child safe environments. • Respect children's rights, diversity and inclusion. • Escalate concerns relating to child abuse, reportable conduct, unsafe environments or non-compliance immediately through approved processes.

8. Related legislation and internal documents

The following legislation, regulations and internal documents inform and support this policy, ensuring compliance with legal requirements and consistent implementation.

Legislation	United Nations Convention on the Rights of the Child Education and Care Services National Law Education and Care Services National Regulations State and Territory Child Safe Standards legislation Reportable Conduct legislation Working with Children legislation	
Policy/Procedure, Process	POL2-P5 Child Safety and Protection Procedure POL 2-P33 Safe Use of Digital Technologies - Electronic Devices POL6-P6 Complaints Policy and Procedure POL 2-P24 Incident Injury Trauma and Illness Policy and Procedure POL 4-P9 Recruitment and Onboarding Policy and Procedure	POL7-P8 Policy Governance, Compliance and Review Procedure POL 3-P4 Risk Assessment Procedure POL 2-P33 Safe Use of Digital Technologies - Electronic Devices POL3-P1 Providing a Child Safe Environment Policy and Procedure POL 2-P28 External Visitor Procedure POL6-P4 Equity and Inclusion Procedure

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	POL 7-P16 Suitability, Criminal Record and Background Checks Procedure POL 4-P10 Onboarding and Induction Procedure POL 2-P28 External Visitor Procedure POL4-P1 Day to Day Charge Procedure POL5-P1 Interactions with Children Policy and Procedure POL6-P5 Confidentiality and Privacy Procedure	POL5-P2 Supporting Behaviours Procedure POL6-P3 Family Engagement Procedure POL6-P7 Family Code of Conduct Procedure POL1-P1 Pedagogy and Practice Procedure POL7-P1 Governance and Management Policy and Procedure POL HR5 AEG Code of Conduct GUI 1390 Enterprise Risk Management Framework
Forms		
Learning artifacts		

9. Version history

The version history table below records updates to this document, including approval dates and a summary of changes made.

Version Control	Date	Author	Description of Change
V11.21	Nov 2021	AEG	New procedure
V12.22	Dec 2022	AEG	Added references
V12.23	Dec 2023	AEG	Removed separate NSW and QLD specific standards. Added RACI table and reference.
V12.24	Dec 2024	AEG	Added state links
V5.0	Dec 2025	AEG	Provided additional strategy information, updated reference links, updated internal systems and training modules
V5.1	Feb 2026	AEG	Added National Early Childhood Worker Register information and National Child Safety Training requirements
V5.2	Apr 2026	AEG	Added NSW reforms information
V5.3	May 2026	AEG	Added in Correct Mandatory Training information and Reflected position that employees must advise of any new notices or items that may impact their WWCC
V6	Aug 2026	AEG	Scheduled review – editorial amendment. Updated to refreshed Affinity standard and included all supporting policies and procedures that relate to the child safe principles

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