

Learn Safe Guide



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Work Safe Policy

1. Our Commitment to Safety

Learnivation is deeply committed to providing a safe, healthy, and supportive workplace for all employees, students, trainers, and assessors. We prioritise the physical, mental, and emotional well-being of everyone associated with our organisation.

For us the well-being of our team, students, trainers, and assessors is paramount. We are committed to maintaining a safe and supportive learning and working environment that aligns with ASQA standards, the Safe Work Act, and relevant Australian QHS legislation.

2. Scope:

This comprehensive guide outlines our dual legal framework: Work Health and Safety (WHS) for the workplace and Student Wellbeing, Safety, and Child Protection for all students, aligning with the WHS Act 2011 (Qld) and the Child Safe Organisations Act 2024 (Qld). It applies to all individuals involved in our RTO's activities.

3. Safe Work Objectives:

Our Work Safety Guide is designed to guide us in achieving our objectives, which value physical, mental, and emotional well-being equally:

- 1. Comprehensive Risk Management and Prevention: Proactively identify and manage risks to prevent physical injuries, mental strain, and emotional harm in the workplace.
- 2. Holistic Safety and Continuous Improvement: Promote a culture of continuous safety improvement, encompassing physical, mental, and emotional well-being.
- 3. Mental and Emotional Health Support: Prioritise mental and emotional health by fostering a supportive and open environment where individuals feel comfortable seeking help.
- 4. Accessibility and Flexibility: Provide readily accessible mental and emotional health support services (e.g., counselling, EAPs) and flexible arrangements to accommodate individual needs where possible.



- 5. Positive and Inclusive Coaching Culture: Cultivate a supportive and inclusive work environment that promotes open communication, reduces stigma, and encourages a healthy balance across physical, mental, and emotional aspects of life.
- 6. Proactive Response to Concerns: Implement clear procedures for addressing mental and emotional health concerns, including support, resources, and protection against adverse treatment or discrimination.
- 7. Education, Awareness, and Empowerment: Provide regular training and resources on physical, mental, and emotional well-being for employees and managers, promoting understanding, self-care, and proactive support for others.

4. Our Safe Work Ethos:

Everyone deserves a safe, healthy, and supportive work environment. We are committed to fostering a holistic approach to safety that prioritises physical, mental, and emotional well-being for all employees, students and Learning Coaches (Trainers and assessors).

We strive to create a workplace where:

- Risks to physical, mental, and emotional health are proactively identified and managed.
- Continuous improvement in all aspects of safety is a shared value.
- Mental and emotional health are recognised as essential, and a supportive culture encourages open communication and seeking help when needed.
- Confidential and accessible support services are available, and flexibility is offered where possible to support individual needs.
- Everyone feels respected, included, and empowered to prioritise their overall wellbeing.
- We proactively address concerns, offer resources, and protect individuals from discrimination based on any aspect of their health.
- Education and awareness are ongoing, empowering everyone to look after themselves and support their colleagues.

Through inclusive and proactive practices, we aim to build a workplace where everyone feels safe, valued, and supported to thrive.

5. Risk Management

Hazard Identification and Risk Assessment: We conduct regular workplace inspections and risk assessments to proactively identify physical hazards (ergonomic, electrical, etc.), stress factors,



risks to mental and emotional health, and potential for bullying/harassment.

- Risk Control and Mitigation: We implement a hierarchy of control measures (elimination, substitution, engineering, administrative, PPE) to minimise risks. Our approaches to mitigate mental health risks include workload management, supportive culture, clear communication, and mental health awareness initiatives.
- **Safe Work Procedures:** We develop clear safety procedures for tasks with identified risks, ensuring our staff has the necessary knowledge and instructions to work safely.

For Learnivation's' risk management procedures, please refer to the LC Procedure Manual.

6. Incident Reporting and Investigation

To ensure safety, we have implemented comprehensive business procedures and investigation protocols:

- **Procedures:** Clear procedures are in place for reporting all incidents, injuries, and near-misses (WHS incidents). Note: Allegations of harm or reportable conduct involving a student must follow the separate Learnivation Mandatory Reporting Procedure.
- **Investigation**: Thorough investigations are conducted into incidents to understand the root causes and implement measures to prevent recurrence.

For Learnivation incident reporting and investigation procedures, please refer to the LC Procedure Manual.

7. Emergency Procedures

To ensure safety during emergencies, we have implemented comprehensive business procedures for emergencies including

• Plans: We maintain comprehensive emergency plans for situations like fires, medical emergencies, natural disasters, or security threats. These plans include detailed evacuation routes and emergency contact information.



 Training: We provide regular training and drills to ensure staff and students are familiar with emergency procedures and actions.

For Learnivation emergency management procedures, please refer to the LC Emergency Management Plans.

8. Physical Safety

At Learnivation, the physical safety of our team is a top priority. Given the nature of our business, our primary focus areas for safety include:

- Ergonomics: We promote ergonomic workstations, educate on proper handling techniques, and encourage regular breaks.
- Equipment: We prioritise equipment safety through regular maintenance, inspections, and comprehensive training on the safe use of all equipment.
- First Aid: We maintain well-stocked first-aid kits and ensure all Learning Coaches hold current first-aid certifications.

For Learnivation WHS procedures, please refer to the <u>Procedure Manual</u>.

9. Mental Health and Emotional Safety

To proactively promote mental well-being at work, we have implemented a comprehensive team wellness strategy encompassing awareness, support, a positive culture, and growth. This approach effectively addresses mental health needs in the workplace.

Key inclusions in our Strategy:

- Awareness: We provide education on mental health, stress management, and self-care.
- Support: We offer accessible support resources, such as our Employee Assistance Program (EAP), professional counselling, and flexible work arrangements where possible.
- Culture: We foster a respectful, inclusive, supportive environment, prioritise open communication, and actively work to reduce stigma around mental health concerns.



For more details on our Mental Health & Wellbeing Strategy, please refer to it here.

10. Professional Development

To foster a culture of safety within our teams, we engage in ongoing training, coaching, and consultation initiatives. These efforts enhance our organisation's awareness and commitment to workplace safety. All staff members receive comprehensive first-aid training. Additionally, we offer various professional development activities such as

- Team Induction: Our team induction includes a set of safety elements in onboarding for staff and students to ensure they have the awareness, understanding and know-how to access the vast array of resources we provide our teams to support their safety when working with us.
- **Regular Training:** We provide ongoing safety updates, refreshers, and task-specific training.
- Coaching: In our business, we promote an active coaching culture, organising at least one coaching session monthly which covers each individual's emotional, mental and physical well-being.
- Consultation: We actively involve staff and students in safety discussions and decision-making processes

Access our current Professional Development Plan here.

10. Roles & Responsibilities

Ensuring all individuals' safety and well-being is paramount to Learnivation. To achieve this, clearly defined roles and responsibilities play a crucial part. Let's delve into the specific roles of different stakeholders in promoting safety:

Leadership:

Safety Initiatives and Resources:

 Lead the development and implementation of comprehensive safety policies, procedures, and guidelines.



- Allocate sufficient funding and resources to ensure safety measures are in place, including training, infrastructure, and equipment.
- Regularly audit safety practices to identify areas for improvement.
- Monitor and enforce adherence to safety policies and regulations, taking corrective actions to address non-compliance and prevent future safety incidents.

Creating a Supportive Environment:

- Promote a culture of safety by emphasising its importance, setting a positive example, and providing regular safety training and education for staff.
- Create a work environment that prioritises employee well-being and mental safety.
- Lead by example, demonstrating empathy and understanding towards employees' mental health needs.

Training and Education:

 Provide regular training and education on mental health awareness, stigma reduction, and supportive leadership practices for managers.

Confidentiality and Privacy:

• Maintain the confidentiality of employees' mental health information, adhering to relevant privacy laws and ethical standards.

Accommodations:

 Collaborate with employees to provide reasonable accommodations and flexible work arrangements, if necessary, to support their mental well-being.

2. Staff:

Comply with Policies:

- Familiarise themselves with and strictly adhere to safety policies, procedures, and guidelines.
- Actively participate in safety training and education programs.
- Report any safety hazards, incidents, or near misses to the appropriate authorities promptly.

Report Hazards:

- Regularly inspect their work areas and identify potential hazards or unsafe conditions.
- Report these hazards to supervisors or safety personnel immediately.



Follow established procedures for reporting safety incidents and near misses.

Participate in Safety Activities:

- Actively participate in safety meetings, drills, and training sessions.
- o Provide suggestions for improving safety practices and procedures.
- Support and encourage a positive safety culture within the organisation.
- All staff are required to maintain a current first aid certificate.

Self-Care:

- o Employees are responsible for taking care of their own mental well-being and seeking support when needed.
- o Communicate any mental health concerns to their supervisors or the designated mental health support team.

Respect and Support:

- o Treat colleagues with respect and understanding, refraining from stigmatising language or behaviour.
- Support a positive and inclusive work environment by fostering open conversations about mental health.

3. Students:

- Follow Safety Instructions:
 - o Familiarise themselves with and follow safety instructions provided by teachers, instructors, or supervisors.
 - Wear appropriate personal protective equipment (PPE) when required.
 - o Conduct experiments and activities safely and responsibly.

Report Any Concerns:

- o Immediately report any safety concerns, such as hazardous conditions, equipment malfunctions, or unsafe behaviours, to the appropriate authorities.
- Seek clarification if they are unsure about any safety procedures or requirements.

4. Trainers and Assessors:

- Integrate Safety into Training Activities:
 - Incorporate safety into all training and assessment activities.
 - o Emphasise the importance of safety and provide practical examples of how to work safely in different situations.
 - Ensure that safety procedures are clearly communicated and understood by trainees.



- Address Hazards in Learning Environments:
 - Identify and address potential hazards in learning environments, such as laboratories, workshops, or field sites.
 - Develop and implement safety protocols specific to the learning environment.
 - Regularly inspect and maintain equipment and facilities to ensure they are safe for use.

For Learning Coaches' roles and responsibilities, please refer to the required role within the <u>LC</u> Procedure.

11. Review, Monitoring, and Continuous Improvement

We are dedicated to maintaining a quality system that guarantees the continued review and evolution of our businesses' safety procedures. Some of the mechanisms we employ include

Quarterly Review:

Conduct a comprehensive review of policies, procedures, and incident data every quarter to identify areas for improvement. This review should involve key stakeholders, including safety personnel, administration, and representatives from various departments.

Feedback Collection:

We have implemented a structured feedback mechanism to foster a culture of feedback and continuous improvement in safety practices. This mechanism includes suggestion boxes, online surveys, and dedicated email addresses. We also allocate specific agenda items during performance management meetings to discuss health and safety matters, ensuring ongoing feedback and evaluation of our business practices. This approach enables us to gather valuable input from staff and students, leading to the identification of areas for improvement and the enhancement of our safety protocols.

We have a proud culture of open communication where feedback is valued and acted upon. Within the quarterly review we analyse feedback and its implementation to identify common concerns and areas for ongoing improvement.

For Learnivation Monitoring and Review procedures, please refer to the Procedure Manual.



12. Legislative References

To ensure compliance, we regularly review our policies and procedures for adherence to the following Commonwealth and Queensland legislation:

- Work Health and Safety Act 2011 (Queensland): The cornerstone legislation, outlining general duties of care, risk management, consultation requirements, and incident reporting.
- Work Health and Safety Regulation 2011 (Queensland): Contains specific regulations and codes of practice that support the WHS Act.
- Electrical Safety Act 2002 (Queensland) and Electrical Safety Regulation 2013 (Queensland): Relevant if your work involves electrical equipment or installations.
- Environmental Protection Act 1994 (Queensland): Relevant for environmental hazards, waste management, and pollution concerns.
- Discrimination Act 1991 (Queensland): Laws ensuring a workplace free from discrimination, harassment, and bullying.
- Fair Work Act 2009 (Commonwealth): Provides guidance on minimum employment standards, workplace rights, and obligations.
- ASQA Standards for RTOs 2025 (relevant clauses)

Student and Child Safety Specific Legislation

The following laws govern our responsibilities toward student and child safety and well-being:

- Child Protection Act 1999 (Queensland): The primary source of mandatory reporting obligations for suspected harm or risk of harm to children.
- Child Safe Organisations Act 2024 (Queensland): Outlines the requirements for implementing the Child Safe Standards and the Reportable Conduct Scheme.
- Working with Children (Risk Management and Screening) Act 2000 (Queensland): Governs the Blue Card system, ensuring suitability for all staff engaged in child-related work.
- Information Privacy Act 2009 (Queensland): Governs the collection, storage, use, and disclosure of personal and sensitive student information, including health records and mandated disclosures.
- Human Rights Act 2019 (Queensland): Requires the facility to consider and act compatible with human rights (e.g., the right to education, protection of children, and cultural rights) when making decisions that impact students.





Student Wellbeing, Safety, and Support Policy

1. Policy Statement and Scope

Learnivation is committed to providing a safe, inclusive, and supportive learning environment that promotes the physical, mental, emotional, and cultural wellbeing of all students. This policy aligns with the principles of the Queensland Child Safe Organisations Act 2024, the Standards for Registered Training Organisations (RTOs), and relevant Queensland education legislation.

Scope: This policy applies to all students, staff (including Learning Coaches (trainers and assessors), work experience coaches, administration, and management), volunteers, and contractors while engaged in any activity related to Learnivation or its RTO operations.

2. Alignment with Queensland Child Safe Standards (QCSS)

Our commitment to student wellbeing is primarily demonstrated through the implementation of the ten QCSS, which are embedded within all our policies and practices, guided by the Universal Principle of Cultural Safety.

Universal Principle: Cultural Safety

Learnivation commits to creating an environment that promotes and upholds the right of Aboriginal and Torres Strait Islander children to feel culturally safe. This involves active consultation, respect for cultural identity, and ensuring that policies and practices are not culturally biased or discriminatory.

Key Child Safe Standards Integration (QCSS Examples):

- Leadership and Culture: Senior leadership at Learnivation actively champions a child-safe culture through governance, resource allocation, and clear accountabilities for student safety and wellbeing.
- Empowerment: Students, particularly children and young people (under 18), are informed about their rights, are listened to, and are involved in decisions that affect their safety and wellbeing.
- Suitability of Staff: We have robust recruitment, screening (Blue Cards), induction, training, and supervision processes to ensure all staff and volunteers are suitable to work with children and young people.



- Complaints Handling: We maintain an accessible, child-focused, and transparent complaint and reporting system where students can safely raise concerns about their wellbeing or the conduct of staff/others.
- Safe Environments: We actively manage risks in our physical and online environments, ensuring spaces are safe, monitored, and age-appropriate.

3. Student Support and Wellbeing

In accordance with the RTO Standards (specifically focusing on Standard 2.6 and related standards), Learnivation ensures students receive the support needed to successfully complete their training.

- Identifying Wellbeing Needs: Prior to and throughout enrolment, we actively work to identify the wellbeing and support needs of our VET student cohort and individual learners. This includes, but is not limited to:
 - o Language, Literacy, and Numeracy (LLN) support.
 - Physical, mental, or emotional health concerns that may affect learning.
 - Accessibility requirements (disability support and reasonable adjustments).
 - Identifying if course content is potentially confronting (e.g., in community services or mental health training) and implementing appropriate debriefing or support strategies.
- Provision and Referral of Support: Learnivation commits to providing and/or advising students of accessible wellbeing support services.
 - Internal Support: This includes access to Student Support Officers, trainers, or designated staff for academic and non-vocational barriers (e.g., course adjustments, LLN assistance).
 - o External Referral: We maintain a current list of external support services (e.g., counselling, mental health services, financial aid, crisis support) and have a clear process for referring students to these services as appropriate.
- **Documentation:** All support provided, adjustments made, and referrals given are documented in the student's file with attention to privacy requirements.

4. Reporting and Responding to Harm (Child Safety)

The protection of children and young people is paramount at Learnivation. Staff must be aware of their legal and ethical responsibilities regarding child protection.

A. Mandatory Reporting



All staff must comply with mandatory reporting obligations under the Child Protection Act 1999 (Qld) and the Education (General Provisions) Act 2006 (Qld).

 Action: If a staff member reasonably suspects a student has been harmed or is at risk of harm, they must immediately report this to the Facility Manager/Principal/Child Safety Officer, who will then follow Learnivation's Mandatory Reporting Procedure for notification to the appropriate external agency (e.g., Department of Child Safety, Seniors and Disability Services, or Police).

B. Reportable Conduct Scheme (RCS)

All allegations or convictions of reportable conduct by a staff member or volunteer (e.g., sexual misconduct, serious physical violence, serious neglect, or severe emotional harm against a child) must be reported to the Queensland Family and Child Commission (QFCC) and investigated following Learnivation's Reportable Conduct Procedure.

- Procedures: Learnivation will have clear procedures for:
 - Immediate reporting and risk assessment.
 - o Investigating allegations (internal or external).
 - Record-keeping and sharing information in line with legislation.

5. Policy Implementation and Review

- Communication: This policy will be provided to all students (including in student handbooks), staff, and available on Learnivation's website. Information on how students can access support will be clearly visible in the learning environment.
- Training: All staff, volunteers, and contractors engaged in child-related work will complete mandatory child protection training and regular professional development on student wellbeing and cultural safety.
- Continuous Improvement: The effectiveness of this policy and its procedures will be reviewed annually, and whenever there are changes to Queensland legislation (QCSS, RTO Standards, etc.), using feedback from students, parents/carers, staff, and external reports.

6. Contact Information and Key Roles

Role		Contact Details	Responsibilities
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Child Safety Officer (CSO)	Danielle Duncan dani@learnivation.edu.au	Primary contact for child safety concerns and mandatory reporting.
Student Support Officer (SSO)	Danielle Duncan dani@learnivation.edu.au	Provides wellbeing support, academic support, and external referrals.
Emergency Services	000	For all immediate threats to safety or life.



Child-Focused Complaints and Appeals Procedure

This procedure is essential because it merges two major compliance requirements:

- 1. RTO Standards (ASQA): You must have a clear, documented complaints and appeals process that is fair, provides procedural fairness, and outlines pathways for external review (e.g., the Queensland Training Ombudsman or ASQA).
- 2. Queensland Child Safe Standards (QCSS Standard 6): The procedure must be accessible, child-focused, and transparent. This means:
 - o Children/students must be informed about how to complain in an age-appropriate way.
 - o The process must handle safety concerns sensitively and be trauma-informed.
 - o It must outline the immediate referral to the Mandatory Reporting Procedure if a safety concern is raised during a complaint.

Key Elements to Include	RTO Compliance Focus	Child Safety Focus
Avenues for Complaint	Academic, administration, fees, trainers, and service quality.	Conduct by staff, other students, or safety concerns.
Procedural Fairness	The respondent (staff or student) has the right to respond to allegations.	Child-focused, trauma-informed, and guarantees protection from reprisal.
Timeframes	Acknowledge the complaint within 5 business dates; resolution within 20 business days.	Expedited timeline for all allegations related to safety.
External Review	Advise students of the right to contact the Queensland Training Ombudsman or ASQA if unsatisfied.	Advice of legal obligation to report certain findings (e.g., reportable conduct by staff) to QFCC (post-July 2026)



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2. Student and Staff Code of Conduct (Incorporating Child Safety)

This moves your policy from reactive response to proactive prevention. Your existing document mentions this implicitly, but the new Qld laws require a robust Code of Conduct that clearly sets boundaries for behaviour toward children/students.

Key Elements to Include	Focus
Professional Boundaries	Clear rules for staff/student interaction (in-person, online, and out-of-hours). Must be specific to avoid common boundary breaches.
Use of Technology	Rules for staff use of personal devices, social media, and communication with students (e.g., no personal contact details). (Addresses QCSS Standard 8: Safe Online Environments).
Universal Principle	Explicit requirement for all staff to act in a manner that upholds the cultural safety of Aboriginal and Torres Strait Islander students.
Consequences	Clear disciplinary actions for breaches, including termination and referral to external agencies/Police for serious misconduct.

3. Child Safety Risk Management Strategy

While your current "Risk Management" section covers general WHS, the new Qld laws require a specific strategy that identifies and mitigates risks of harm to children/students. This replaces the old Child and Youth Risk Management Strategy (CYRMS) but is just as crucial.

Key Elements to Include	Focus
Risk Areas	Specific risks identified for your facility (e.g., unsupervised access to restricted areas, online bullying in learning management systems, high-risk training activities).



Risk Mitigation Actions	Concrete controls for each risk (e.g., mandatory two staff in remote/online sessions, specific Blue Card procedures for volunteers, supervised common areas).
Online Environment	Dedicated risk assessment for online platforms, communication tools, and data privacy (Addresses QCSS Standard 8).
Risk Ownership	Clear allocation of responsibility for managing and reviewing each risk (aligning with your Leadership roles).



Student and Staff Code of Conduct

1. Purpose and Scope

This Code sets out the professional boundaries and expected behaviours for all Staff (including trainers, assessors, contractors, and volunteers) and Students of Learnivation. Its primary function is to proactively prevent harm to students, uphold the cultural safety of Aboriginal and Torres Strait Islander students, and align with the Queensland Child Safe Standards.

2. Universal Principles and Cultural Safety

All individuals at Learnivation must:

- Prioritise Safety: Always put the safety and wellbeing of children and young people (students under 18) first.
- Actively Respect Cultural Safety (Aboriginal and Torres Strait Islander Peoples): Act with respect for cultural identity, heritage, and kinship ties. Never engage in culturally biased, discriminatory, or racist behaviour, including jokes or stereotyping.
- Act Ethically: Maintain honesty, integrity, and transparency in all interactions.
- Report Concerns: Immediately report any concern, hazard, or suspicion of harm or misconduct to the Facility Manager/Child Safety Officer. Follow our Child Safe Mandatory Reporting Procedures.

3. Professional Boundaries (Staff/Learning Coach Obligations)

Staff must maintain clear, appropriate professional boundaries with all students, regardless of the student's age.

Requirement	Unacceptable Behaviour (Examples of Breaching Boundaries)
Physical Contact	Initiate or engage in any unnecessary or excessive physical contact (e.g., hugging, rough play, tickling). All contact must be transparent, appropriate, and contextual (e.g., guiding equipment safely).



Communication	Communicate with students one-on-one using personal devices (mobile, email, social media) or outside official Learnivation channels. Messaging must be exclusively related to training and assessment.
Technology	Use social media to connect with current or former students in a personal capacity. Access or store any inappropriate or private material related to a student.
Personal Information	Share personal, private, or non-work-related information about themselves or others with students, or seek highly personal information from students.
Gifts/Favours	Exchange gifts, money, or favours with students. Staff must never enter into a financial or employment relationship with a student.
Private Meetings	Meet with a student in a private, unobserved space. If a one-on-one conversation is required, the door should remain open or a third party should be made aware.

4. Student Obligations

Students are required to:

- Respect Others: Treat all staff and fellow students with dignity and respect, free from bullying, harassment, discrimination, or violence (physical, verbal, or online).
- Follow Safety Rules: Adhere strictly to all WHS, emergency, and assessment instructions provided by staff.
- Be Accountable: Take responsibility for their own learning and behaviour, and participate in a way that does not put themselves or others at risk.



Report Harm: Report any concerns about their own safety, the safety of others, or any inappropriate staff conduct to the Student Support Officer or the Facility Manager.

5. Consequences of Breaching the Code

Any breach of this Code by a staff member or student will be subject to disciplinary action, which may include:

- 1. Verbal or Written Warning
- 2. **Suspension or Expulsion** (for students)
- 3. **Termination of Employment** (for staff/contractors)
- 4. Referral to External Agencies: In cases involving reportable conduct or child harm, Learnivation is legally required to refer the matter to the Queensland Police Service and/or the Queensland Family and Child Commission (QFCC).



Child Safety Risk Management Strategy

1. Purpose and Scope

This Strategy details how Learnivation proactively identifies, assesses, and mitigates risks of harm to children and young people (under 18) within all our educational activities, facilities, and online environments. This process is mandatory under the Child Safe Organisations Act 2024 (Qld) and directly addresses the requirements of the Queensland Child Safe Standards (QCSS).²

2. Risk Management Principles

This Strategy is guided by the principle that:

- The safety and best interests of the child are paramount.
- All identified risks must be managed with a proactive, preventative focus.
- Cultural safety for Aboriginal and Torres Strait Islander students must be embedded in all risk controls.
- Risk assessment must be continuous and driven by feedback from students, staff, and the community.

3. Key Risk Areas, Hazards, and Controls

The table below outlines the primary areas of risk specific to an RTO environment and the controls Learnivation implements.

Risk Area/Hazard	Potential Harm	Risk Control/Mitigation Measure (QCSS Alignment)
Recruitment & Staff Suitability (QCSS 5)	Staff members (paid or volunteer) with a history of harm gain access to students.	Mandatory Blue Card: No person commences child-related work without a valid Blue Card (or exemption card). Interview & Reference Checks: Screening explicitly verifies commitment to child safety. Induction: Mandatory training on the Code of Conduct, Mandatory Reporting Procedure, and QCSS.



Online Learning & Communication (QCSS 8)	Cyberbullying, inappropriate private communication, access to harmful material, or grooming via online platforms.	Approved Platforms Only: All student-staff communication must occur through the secure, monitored Learnivation LMS/system. No Personal Details: Staff are prohibited from sharing personal contact details or accepting student friend requests on personal social media. Monitoring: Clear policy on how online activity is monitored and the protocol for reporting online bullying/misconduct.
Physical Environment (QCSS 8)	Unsupervised access, hidden/private spaces, or unsafe facilities allowing opportunities for harm.	Visibility: Learning spaces are open, highly visible, and free from 'out-of-sight' areas. Signage & Access: Clear signage directs students; restricted areas are securely locked. Supervision Ratios: Adherence to appropriate supervision ratios during all on-site and off-site activities. A maximum of 12 students per educator.
Complaint Handling Failure (QCSS 6)	Complaints are ignored, mishandled, or the student is subject to retaliation/reprisal, leading to further harm.	Child-Focused Procedure: Use of the established Child-Focused Complaints and Appeals Procedure, guaranteeing support for the complainant and protection from reprisal. Reporting: Mandatory 24-hour reporting to the CSO for any complaint alleging misconduct by staff.



Cultural Insensitivity & Exclusion (Universal Principle & QCSS 4)	Policies, practices, or staff actions lead to exclusion, marginalisation, or cultural distress for Aboriginal and Torres Strait Islander students.	Cultural Plan: Development and adherence to a Cultural Safety Action Plan. Mandatory Training: All staff must complete Cultural Awareness and Cultural Safety Training. Consultation: Engagement with local Elders/Community leaders to review policies and practices.
High-Risk Activities (e.g., Excursions)	Lack of planning/preparation for risks unique to excursions or specialised training environments.	Pre-Activity Risk Assessment: Completion of a specific risk assessment for every excursion or off-site activity, reviewed by the Leadership team. Communication: Provision of emergency contacts, medical information, and activity details to parents/carers prior to the event.

4. Continuous Review and Improvement (QCSS 9)

The effectiveness of this Strategy is subject to ongoing review to drive continuous improvement:

- Annual Review: A formal review of this entire Strategy will be conducted annually by the Learnivation Leadership Team and the Child Safety Officer (CSO).
- Data Analysis: The annual review will analyse data from the Complaints and Appeals Register, incident reports, and staff/student feedback surveys to identify emerging risks or failure points in controls.
- Corrective Action: Findings from the review will result in an action plan, assigning specific responsibilities and timelines to Leadership roles for implementation.

5. Responsibility and Accountability

The Learnivation Leadership Team holds the ultimate responsibility for embedding, maintaining, and reviewing this Strategy.

Role	Responsibility
CEO/Head of Entity	Final approval and strategic oversight of the entire Strategy and compliance with the Child Safe Organisations Act 2024.



Child Safety Officer (CSO)	Operational management of the Strategy, managing all mandatory reports, and leading annual risk reviews.
Staff/Learning Coaches	Active implementation of all controls listed above, maintaining professional boundaries, and immediate reporting of concerns.

