


| | |
|--|---|
|  BOND UNIVERSITY | CHILD AND YOUNG PERSONS (UNDER 18) SAFETY AND WELLBEING POLICY |
| Policy Owner | University Registrar |
| Contact Officer | Staff: Chief People Officer Students: University Registrar |
| Endorsement Authority | University Registrar |
| Date of Next Review | May 2029 |

1. PURPOSE AND OBJECTIVES

The purpose of this Policy is to acknowledge Bond University’s commitment to the safety and wellbeing of [Children and Young Persons](#) (Under 18) who are involved in university activities or services. As part of this culture, Bond University encourages all students to be informed of their rights and to participate in any decisions affecting them. The University promotes an environment of safety by ensuring Children and Young Persons’ safety and wellbeing is prioritised in leadership and governance. This Policy ensures that the University fulfils its responsibilities and regulatory obligations under the following:

- [Child Safe Organisations Act 2024](#) (QLD) and the [National Principles for Child Safe Organisations](#)
- [Education Services for Overseas Students Act 2000](#) (ESOS Act)
- [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) with a particular emphasis on [Standard 5: Younger Overseas Students](#)
- [Working with Children \(Risk Management and Screening\) Act 2000](#) (QLD)
- [Child Protection Act 1999](#) (QLD).

2. AUDIENCE AND APPLICATION

This Policy applies to all members of the University community including all staff, committee members, students, visitors, [Volunteers](#) and contractors who interact with Children or Young Persons or have exposure to Children in the course of their research, work activities or study whilst at, or engaged by Bond University.

This Policy should be read in conjunction with the [Gender-based Violence Prevention and Response Policy](#), the [Gender-based Violence Prevention and Response Procedure](#), the [Anti-Discrimination and Anti-Racism Policy](#), and other policies and procedures that address behavioural standards and conduct expected at Bond University.

Bond University requires all members of the University community to act ethically and comply with the affiliated legislation, policies, procedures and guidelines as listed under [Clause 14](#).

3. ROLES AND RESPONSIBILITIES

| Role | Responsibility |
|--|--|
| All staff | <ul style="list-style-type: none"> ▪ Provide a safe environment for Children and Young Persons who are engaged in university activities or services or activities facilitated by Bond University. |
| University Council and Senior Leadership | <ul style="list-style-type: none"> ▪ Ensures that the University complies with all Commonwealth and Queensland legislation or other regulatory requirements relating to Child welfare and protection as appropriate. |
| University Registrar (PEO) | <ul style="list-style-type: none"> ▪ Overarching responsibility and accountability for the general welfare and support of students under the age of 18, including oversight of procedural arrangements for under 18 students on a student visa under the ESOS Act and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Standard 5). ▪ Delegated as the Convenor of Safer Communities Response Team. ▪ The principal point of contact for Child protection matters involving students. ▪ Oversight of Working with Children procedural requirements as they relate to students, including managing breaches of the Code of Conduct for Working with Children and Young Persons and considering options for students issued with a negative notice (Child and Young Persons Risk Management Procedure Clause 5.2). |

| | |
|--|---|
| Chief People Officer | <ul style="list-style-type: none"> Member of the Safer Communities Response Team for staff matters. The principal point of contact for Child protection matters involving staff. Oversight of Working with Children procedural requirements as they relate to Staff and Volunteers, including managing breaches of the Code of Conduct for Working with Children and Young Persons and terminating appointments if required (Child and Young Persons' (Under 18) Risk Management Procedure). |
| Student Transition, Wellbeing & Safety Committee | <ul style="list-style-type: none"> Responsible for standing item re de-identified bi-annual reports on Under 18 student data, consultation and strategic priorities, evaluations of training and impact. Membership currently includes subject expertise including expertise related to gender-based violence and trauma-informed practice. |
| Safer Communities Response Team | <ul style="list-style-type: none"> Responsible for operationalising the University's response to Child and Young Persons' gender-based violence Disclosures and reports with primary role to receive reports of GBV, undertake initial risk assessment, initiate first response, risk and safety checks including communication with parties on appropriate options, and determining pathway of response. |
| Director, Admissions | <ul style="list-style-type: none"> Implements the issuance of a Confirmation of Appropriate Accommodation and Welfare (CAAW) Letter or approval by the Department of Home Affairs (DHA) for an international student under the age of 18 to live in Australia with a nominated guardian. Oversight of Under 18 written agreements to ensure compliance. |
| Director, Campus Life | <ul style="list-style-type: none"> Oversight of Homestay agreement to ensure compliance. Oversight of Under 18 student placement arrangements in Student Residences. Oversight of airport transfer services for international students under 18. Responsible for Blue Card requirements specific to Student Residences. |
| Faculty/University Academic Unit/Office/ Career Development Centre Delegates | <ul style="list-style-type: none"> Manage student/employee/Volunteer Blue Card requirements, ensuring adherence to 'No Card, No Start' legislation. Oversight and risk management of Simulated Activities involving Child Actors in accordance with the Child and Young Persons' Under 18 Risk Management Procedure. |
| Designated Unit Contact Person | <ul style="list-style-type: none"> Ensure staff within their area complete Working with Children training and manage Disclosures of harm in accordance with the Child and Young Persons (Under 18) Risk Management Procedure. Review Risk Management Plan on an annual basis Complete High Risk Activities or Special Events Risk Management Plan when required. |
| People & Talent Staff | <ul style="list-style-type: none"> Ensure compliance with Blue Card Procedure. Blue Card requirements included in recruitment processes and training module available. |
| Staff and Volunteers working with Students Under 18 years of age | <ul style="list-style-type: none"> Ensure adherence to the Child and Young Persons (Under 18) Risk Management Procedure. |

4. POLICY STATEMENT

4.1 Commitment to Child Safety and Wellbeing

Bond University is committed to providing an inclusive and safe environment for the safety, wellbeing and empowerment of all Children by:

- Adopting a zero-tolerance approach to discrimination against or abuse of any Child.
- Taking a proactive approach to the prevention of harm to Children by identifying possible exposures and risks early and removing and/or reducing risks to Children and Young Persons.
- Providing an accessible and Child-centred process for reporting allegations of Child abuse or mistreatment.
- A commitment to the [Cultural Safety](#) of Children with Aboriginal or Torres Strait Islander heritage and from cultural and linguistically diverse backgrounds.
- A commitment to the social and psychological safety of Children of all sexualities and gender identities, including intersex.
- A commitment to the wellbeing of all students through a comprehensive student wellbeing framework. Refer also to the Support for Student Policy for further information.
- A commitment to involve Children and Young Persons in making decisions about activities, policies and processes that concern them wherever possible.

- Maintaining robust People and Talent recruitment practices, which explicitly consider Child safety and wellbeing and embed screening requirements as appropriate.
- Ensuring that relevant staff, students and Volunteers are supported with fitting and ongoing education and training in Child safety including the [Child Safe Standards](#), the [Universal Principle](#) and following the Code of Conduct for Working with Children and Young Persons ([Clause 5.2 – Child and Young Persons \(Under 18\) Risk Management Procedure](#)) and [Blue Card Procedure](#).
- Ensuring that all relevant staff engaging with international students under 18 years of age are provided with training on their responsibilities under the [ESOS Act](#) and the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#), with particular emphasis on [Standard 5](#).
- Relevant staff, students and Volunteers implementing the appropriate risk management strategies set out in the [Child and Young Persons \(Under 18\) Risk Management Procedure](#).

4.2 Promoting Child Safety

All members of the University community are responsible for promoting human rights and a culture of safety and wellbeing for Children and Young Persons by:

- Creating an environment that promotes and enables Children and Young Persons' participation and is welcoming, culturally safe and inclusive for all Children and their families, where relevant.
- Complying with any Child safety training, registration or accreditation requirements which may be relevant to their university activities or duties.
- Ensuring that people interacting with students under the age of 18 have been subject to the prescribed screening checks as set out in the [Blue Card Procedure](#).
- Implementing risk assessments when planning interactions with Children and Young Persons in accordance with the appropriate risk management strategies set out in the [Child and Young Persons \(Under 18\) Risk Management Procedure](#).
- Student Transition, Wellbeing and Safety Committee monitoring de-identified information collected specific to the under 18 cohort to be able to provide advice in relation to gap analysis and/or opportunities for developing relevant strategies to mitigate or manage the identified risks.
- If the suspected harm occurs by a student/or to a student ([Reportable Conduct](#)), then the University Registrar is to be made immediately aware as the principal point of contact for reporting Child protection matters. The matter will be investigated by the Safer Communities Response Team following the same process as the [Gender-based Violence Prevention and Response Procedure](#).
- The University has a [Mandatory Reporting](#) obligation to the relevant police service and the Queensland Family and Child Commission (Reportable Conduct Scheme) if a student is under the age of 18 years. Information about actual or suspected Child abuse offences should be brought to the attention of the police and/or Child protection authorities as soon as practicable to do so.

5. STANDARDS OF BEHAVIOUR TOWARDS CHILDREN AND YOUNG PERSONS

5.1 Expected Behaviour – All Staff

Members of the University are in a position of trust and influence. It is important that all staff:

- Comply with all relevant laws, regulations, policies, procedures and guidelines as identified.
- Act in a manner to ensure the safety, wellbeing and protection of Children in any interactions they may have with Children during any activities undertaken as part of study, research, work, living and socialising, which is organised or reasonably associated with the University, whether that activity occurs on campus, at a different site, or online.
- Provide appropriate supervision for Children based on their age and level of maturity.
- Ensure contact, including online, with Children and Young Persons is consistent with university policies, programs, and activities.
- Treat Children and Young Persons with respect. This includes avoiding inappropriate actions, behaviors, or language when interacting with Children.
- Specifically consider risks to the safety and wellbeing of any Children in planning activities and include mitigation strategies (which may be separate to, but in addition to broader work, health and safety risk strategies).
- Be open and transparent and keep other adults informed of any activities to be undertaken with Children.
- Use computers, mobile phones, videos, cameras and social media appropriately.
- Where activities involve the use of images of Children, or information about Children, ensure that the use is appropriate.

Staff must not:

- Engage in unacceptable or unlawful behaviour towards or with a Child or Young Person.

- Engage in any activity that is likely to physically, sexually or emotionally harm a Child or Young Person.
- Unlawfully discriminate against any Child or Young Person or their family members.
- Be alone with a Child or Young Person unnecessarily in the course of their work.
- Arrange personal contact, including online contact, with children they are working with, for a purpose unrelated to the University's activities.
- Use inappropriate language towards or in front of Children or Young Person.
- Inappropriately contact Children or Young Person where it is unsuitable given their age or developmental stage or engage with service providers (in or outside Australia) known to be or reasonably suspected of being engaged in unethical Child employment practices.
- Disclose personal or sensitive information about a Child or Young Person, including images of a child, unless the Child or Young Person and their parent or legal guardian consent or unless they are required to do so by the University's policy and procedure on reporting.
- Ignore or disregard any suspected or disclosed [Child Harm](#) or abuse.

6. RESPONDING TO DISCLOSURE AND REPORTING A SUSPICION OF HARM

All Disclosures and reports of a suspicion of harm are investigated by the Safer Communities Response Team following the same process as the Gender-based violence and Sexual Harm Procedure. The [SCRT](#) operationalise the University's response to incidents of Gender-based Violence and Child Harm including receiving Disclosures and [Formal Reports](#), undertaking initial risk assessments, and determining pathways of response.

The University Registrar is delegated as the Convenor of [SCRT](#) and the principal point of contact for Child protection matters involving students.

The Chief People Officer is a co-opted member of the SCRT for staff matters and the principal point of contact for Child protection matters involving staff.

7. REPORTABLE CONDUCT SCHEME

The Reportable Conduct Scheme requires Bond University to report and investigate allegations or convictions of Child abuse or Child-related misconduct (Reportable Conduct) made about staff or Volunteers. Any reportable breaches of the [Staff Code of Conduct Policy](#) (Clause 6.2.2 – Child Safe Conduct) will result in an investigation and may result in disciplinary action and activate the various workplace investigation policies.

Associated policies: Professional Staff Workplace Investigations Policy, Professional Staff Dismissal Policy, Academic Staff Workplace Investigations Policy, Academic Staff Termination Policy, BUC Teaching Staff Termination Policy.

8. PHOTOGRAPHY AND SOCIAL MEDIA

All members of the University community are required to ensure that photography (and related multimedia such as sound and video), and social media are used appropriately and in accordance with the Associated policies identified below. Organisational areas using photography and related multimedia and social media, in connection with Children and Young Persons are responsible for establishing and implementing guidelines or processes to ensure the use of technology and social media is not detrimental to the child or young person or harmful to their safety.

Associated policies: [Social Media Policy](#), [Privacy Policy](#) and the [Australian Privacy Principles Guidelines](#), [Information Communication Technology Acceptable Use Policy](#), [Information Security Policy](#)

9. INFORMATION MANAGEMENT

A record serves an essential administrative, potentially legal and historical purpose. All information related to [Children and Young Persons](#) must be managed according to University Policy to assist the University in meeting its legislative compliance obligations related to privacy, confidentiality, integrity and availability of information, while ensuring appropriate responsibilities and processes for device and information security.

Any enquiries related to the release of information about a Child or Young Person should be directed to the Privacy Officer (privacy@bond.edu.au). Any concerns regarding a potential [Data Breach](#) related to a child or young person should be reported immediately to the Director, Information Technology Services.

Associated policies: [Information Security Policy](#), [Privacy Policy](#), [Records Management Policy](#)

10. RESEARCH INVOLVING CHILDREN

A member of the university community undertaking research involving Children or Young Persons must receive written approval from the Bond University Human Research Ethics Committee (BUHREC) prior to commencing any

research projects through the University. Refer to the [Bond University Human Research Ethics Policy](#) for further information.

Participating in Department of Foreign Affairs and Trade (DFAT) partner programs or DFAT funded research involving Children or Young Persons will also require adherence to the [Department of Foreign Affairs and Trade Child Protection Policy](#).

11. OVERSEAS STUDENTS

The University acknowledges the additional duty of care regarding the admission and enrolment of overseas students under 18 years of age as informed by the requirements of the [National Code of Practice for Providers of Education & Training to Overseas Students 2018 \(Standard 5\)](#).

The University will ensure appropriate accommodation, support and general welfare arrangements for the safety and wellbeing of under 18 overseas students as set out in the [Welfare Arrangements for Students Under the Age of 18 Procedure](#).

12. CHILD REGULATED WORK

Bond University requires employees, Volunteers, and students who are engaged in Child-related employment or Child-related academic studies to comply with the Act. Compliance will require staff, Volunteers and students to comply with this Policy and the Child and Young Persons' Risk Management Procedure.

13. SIMULATED ACTIVITIES WITH CHILD OR YOUNG PERSON ACTORS

The University recognises the importance of providing high-quality education and training to students, which often involves Simulated Activities. The University may engage Child or Young Person actors who will participate as simulated patients in various educational scenarios. To minimise the risk, engaging Child actors through a reputable and experienced talent agency may assist in the management of risk.

The Faculty overseeing these activities will ensure compliance with all relevant regulations and guidelines regarding working with children and ensure risk management strategies and mitigation measures are in place to safeguard the wellbeing of both child actors and students. This includes adhering to the [Working with Children \(Risk Management and Screening\) Act 2000](#) and Regulations ensuring that parental consent for child actors' participation has been obtained and establishing clear structures and procedures for managing interactions with Child actors during [Simulated Activities](#).

14. DEFINITIONS, TERMS, ACRONYMS

| | |
|-----------------------------|---|
| Antisemitism | Bond University has adopted the International Holocaust Remembrance Alliance Working Definition of Antisemitism : <i>“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities”.</i> |
| Blue Card | A card which is issued by Blue Card Services as a positive notice to an individual. The Blue Card check assesses a person's eligibility to work with Children based on their known past police and disciplinary information. The check assesses criminal history, Child Protection prohibition orders, disqualification orders, if a person is subject to reporting obligations under the <i>Child Protection (Offender Reporting) Act 2004</i> or <i>Dangerous Prisoners (Sexual Offenders) Act 2003</i> as well as other police and disciplinary information. |
| Blue Card Services | A service with the Department of Justice & Attorney-General that undertakes working with Children checks and issue Blue Cards. |
| Child Harm | Harm to a Child is defined as any significant detrimental effect on their physical, psychological, or emotional wellbeing. This can result from a single act, omission, or a combination of them, caused by abuse (physical, psychological, emotional, or sexual) or neglect. |
| Child Safe Standards | Means s.9 of the <i>Child Safe Organisations Act 2024</i> (Qld). These are the National Principles for Child Safe Organisations. |

| | |
|-----------------------------------|--|
| Children and Young Persons | Any person under the age of 18 years. The terms ‘Children’ and ‘Child’ have a corresponding meaning. |
| Cultural Safety | Creating a safe and empowering environment where a Child’s culture, identity and rights are respected and actively supported. |
| Data Breach | This is the unauthorised access to, unauthorised Disclosure of, information held by the University. |
| Discloser | A person who has shared information about their experience of Gender-based Violence including Child Harm . |
| Disclosure | The sharing of information about a person’s experience of Gender-based Violence to the Provider by the Discloser or another person. Generally, the purpose of a Disclosure is to seek advice, information, or support. |
| Formal Report | The provision through formal reporting channels of information about a person’s experience of Gender-based Violence, including Child Harm , to the Provider by the Discloser or another person in the expectation that the Provider will consider taking steps beyond the offer and provision of support services, including (without limitation) the commencement of an investigation and/or a disciplinary process in appropriate circumstances, as required by regulatory obligations. |
| High Risk Activity | These are defined as operations or situations where there is a potential for Child Harm . |
| Mandatory Reporting | <p>In Queensland, the <i>Child Protection Act 1999</i> mandates certain professionals to report suspected Child abuse and neglect to government authorities. i.e. teachers, doctors, registered nurses</p> <p>In addition to the Mandatory Reporting requirements for certain professionals under the <i>Child Protection Act 1999</i>, it is an offence under the <i>Criminal Code Act 1899</i> section 229BC (1)(a) for any adult not to report sexual offending against a Child by another adult to police. This means all adults have the responsibility to report sexual offences against Children to police—unless they have a “reasonable excuse” not to i.e. in this instance a Child means a person under 16 or a person under 18 with an impairment of the mind”.</p> |
| Racism | <p>Refers to “<i>the process by which systems and policies, actions and attitudes create inequitable opportunities and outcomes for people based on race. Racism is more than just prejudice in thought or action. It occurs when this prejudice – whether individual or institutional – is accompanied by the power to discriminate against, oppress or limit the rights of others.</i>” (Australian Human Rights Commission, What is racism?)</p> <p>Racism encompasses:</p> <ul style="list-style-type: none"> ▪ Interpersonal racism – occurs during interactions between individuals and includes making negative comments about a particular ethnic group in person or online, calling others racist names, and harassing/bullying others because of their race; ▪ Institutional racism – the policies, procedures and practices that inform the everyday operations of an organisation and support continued unfair treatment of some people because of their race; and ▪ Systemic racism – the history, ideology, culture and interactions of institutions and policies throughout a whole society that combine to perpetuate inequity to some people because of their race. (Australian Human Rights Commission, Racism. Nobody Wins.). Examples of racism include Antisemitism and Islamophobia. |
| Reportable Conduct | <p>Reportable Conduct includes:</p> <ul style="list-style-type: none"> • a Child sexual offence • sexual misconduct committed in relation to, or in the presence of a Child • ill-treatment of a Child • significant neglect of a Child • physical violence committed in relation to, or in the presence of a Child, or • behaviour that causes significant emotional or psychological harm to a Child. |

| | |
|---|---|
| Reportable Conduct Scheme | The Scheme requires organisations to report and investigate allegations or convictions of Child abuse or Child -related misconduct (Reportable Conduct) made about their workers and Volunteers . |
| Safer Communities Response Team (SCRT) | Comprised of the University Registrar (convenor), Chief People Officer, Director Student Success & Wellbeing, and Head of Campus Security, the SCRT is responsible for coordinating the University's response to Disclosures and Formal Reports of Gender-based Violence and Child Harm . Other Staff members may be included in the SCRT at the discretion of the University Registrar. |
| Simulated Activity | A simulated activity is a form of experiential learning that involves using actors placed in instructional scenarios to represent a reality within which students interact. The actors are trained to present a clinical story to students as you would to a doctor. |
| Universal Principle | In implementing and complying with the Child Safe Standards , a child safe entity must provide an environment that promotes and upholds the right to Cultural Safety of children who are Aboriginal persons or Torres Strait Islander persons (the Universal Principle). |
| Volunteers | A person employed by Bond University who is not paid, other than being reimbursed for out-of-pocket expenses. |

15. AFFILIATED POLICIES, PROCEDURES AND GUIDELINES

Policies

- [Academic Staff Workplace Investigation Policy](#)
- [Accessibility and Inclusion Policy](#)
- [Anti-Discrimination and Anti-Racism Policy](#)
- [Bullying & Harassment Policy \(Staff\)](#)
- [Gender-based Violence Prevention and Response Policy](#)
- [Information Communication Acceptable Use Policy](#)
- [Information Security Policy](#)
- [Privacy Policy](#)
- [Professional Staff Grievance Policy](#)
- [Professional Staff Workplace Investigation Policy](#)
- [Whistleblower and Public Interest Disclosure Policy](#)
- [Social Media Policy](#)
- [Staff Code of Conduct Policy](#)
- [Student Code of Conduct Policy](#)
- [Support for Victims of Family and Domestic Violence Policy](#)

Procedures and Guidelines

- [Blue Card Procedure](#)
- [Child and Young Persons \(Under 18\) Risk Management Procedure](#)
- [Gender-based Violence Prevention and Response Procedure](#)
- [International Outbound Student Mobility Prevention of Sexual Harm Procedure](#)
- [Safety Respect Care Consent Student Support Strategy](#)
- [Student Charter](#)
- [Student General Misconduct Procedure](#)
- [Student Housing Handbook](#)
- [Welfare Arrangements for Students under the Age of 18 Procedure](#)

Affiliated Legislation and Policy

- [Australian Privacy Principles Guidelines](#)
- [Child Protection Act 1999](#) (Qld)
- [Child Safe Organisations Act 2024](#) (Qld)
 - [National Principles for Child Safe Organisations \(Child Safe Standards\)](#)
- [Department of Foreign Affairs and Trade Child Protection Policy](#)
- [Education Services for Overseas Students Act 2000](#)
 - [National Code of Practice for Providers of Education & Training to Overseas Students 2018 \(Standard 5\)](#)
- [United Nations Convention on the Rights of the Child](#)
- [Working with Children \(Risk Management and Screening\) Act 2000](#)
 - [Working with Children \(Risk Management and Screening\) Regulation 2020 \(QLD\)](#)

16. MODIFICATION HISTORY

| Date | Sections | Source | Details |
|-------------|-----------------|--|--|
| May 2026 | | University Registrar | Date First Approved as amalgamated policies: – Welfare Arrangements for Students Under 18 Policy and Working with Children Policy. |
| 19/11/2019 | SS 5.8.4 | Student Wellbeing & Safety Policy | Date first approved |
| 29/11/2007 | SS 5.8.5 | Welfare Arrangements for Students Under the Age of 18 Policy | Date first approved |

Approval Authority: Vice Chancellor