WORKING WITH CHILDREN COMPLIANCE POLICY

Queensland Blue Card and NSW Working with Children Check – Under 18

Owner	**Chief Executive Officer**
Version	1.1 – proposed update, 27 October 2026
Status	Approved
Applies to	Sydney (NSW), Brisbane and Gold Coast (QLD); short-term under-18 study tours and summer camp programs
Review	Annually and earlier following legislative change or a child-safety incident

1. Purpose

The Lan-Grove Office Training Centre Pty Ltd trading as The Sydney Business and Travel Academy (SBTA), SBTA Culinary Institute, SBTA Community Care and The Sydney English Language Academy (SELA), collectively The Academy, establishes procedures for assessing, verifying, recording and monitoring child-related screening obligations for its under-18 programs. Screening is one part of a broader child-safe recruitment and safeguarding framework and does not replace supervision, induction or risk assessment.

2. Legislative and regulatory framework

- NSW: Child Protection (Working with Children) Act 2012 and associated Regulation; Children's Guardian Act 2019.
- Queensland: Working with Children (Risk Management and Screening) Act 2000; Child Protection Act 1999; Child Safe Organisations Act 2024, where applicable.
- Relevant government screening guidance and obligations are checked at the time of each program. Legislative definitions, exemptions and cross-border requirements take precedence over simplified role descriptions in this policy.

3. Scope and role assessment

Applies to Academy employees, teachers, activity and excursion supervisors, contractors, volunteers, relevant overseas group leaders, approved accommodation or homestay providers, and other persons whose duties may constitute regulated child-related work. The Academy assesses the actual duties, frequency, setting, provider relationship and any applicable exemption before deciding whether a check is legally required. Mere incidental contact does not always amount to regulated child-related work.

- Roles ordinarily warranting assessment: teaching under-18 classes, supervising excursions, dedicated welfare supervision, direct transport supervision, organised overnight activities and homestay hosting.
- General cleaners, venue staff, drivers and administrative personnel are assessed against applicable statutory categories and exemptions, rather than automatically classified as needing a check.
- The Academy may apply additional suitability controls, including reference checks, police check where proportionate and lawful, induction and supervised work, without describing these as statutory WWCC/Blue Card requirements.

4. NSW Working with Children Check (WWCC)

The Academy identifies child-related roles and applicable exemptions, registers and verifies through the NSW Office of the Children's Guardian system, and retains the verification outcome. A NSW application (APP) number may permit work under the legislation in some circumstances, but a clearance is required in particular education settings. As The Academy's safeguarding standard, staff assigned unsupervised supervision of under-18 study tour students must have an appropriately verified clearance, unless a documented lawful exemption and approved alternative arrangement apply.

- Verify new workers and relevant renewals online; never rely solely on sighting a card or a screenshot.
- Record full name, date of birth, WWC or APP number where permitted, verification date, result, expiry and paid/volunteer classification.
- Do not place a barred, interim-barred, expired or unverified person into child-related duties. Escalate an adverse status immediately.
- Assess visiting overseas group leaders and short-term interstate/overseas visitors for any specific exemption; document the basis and the actual supervisory role.

5. Queensland Blue Card and exemption card

The Academy assesses regulated employment and exemptions under the Queensland legislation. Where a Blue Card or exemption card is required, a valid status must be verified and the person must be linked to the relevant organisation before regulated work begins (No Card, No Link, No Start). The Academy maintains an employee register and promptly delinks people when the engagement ends.

- Record identity, date of birth, role category, valid card or exemption status, card number and expiry, link status, date checked and any documented exemption basis.
- Immediately remove a person from regulated duties on a negative notice, suspension, cancellation or other disqualifying status and follow applicable reporting steps.
- Overseas teachers accompanying their own study group may fall within a Queensland exemption if they provide no other services or activities to other children. Verify the precise circumstances before relying on it.
- Child-accommodation and homestay categories may require Blue Cards or exemption cards for hosts and adult residents, subject to statutory exceptions; obtain documented verification or suitable evidence from the responsible provider.

6. Overseas partners, contractors and homestays

Before a program, the Program Coordinator identifies who selects, employs, verifies and supervises each person working with students. For third-party providers, the Academy obtains role-based written assurances, named responsible contacts, and verification evidence appropriate to legal and contractual requirements. A partner's assertion alone is not a substitute for an Academy verification obligation where one applies.

- Partner-arranged accommodation: record the partner/provider as the screening owner, seek confirmation of applicable host and adult-resident checks, and maintain escalation and emergency arrangements.
- Academy-arranged accommodation: require completion of the approved host-family screening and property-inspection procedure before placement.

- Overseas accompanying supervisors: confirm their actual role, any Queensland/NSW exception, child protection briefing and supervision allocations; do not assume overseas checks substitute for Australian checks.
- Do not accept a third party to undertake unsupervised responsibility for minors until the applicable screening and safeguarding assessment is complete.

7. Recruitment, onboarding and ongoing monitoring

- Document a screening decision before assigning duties, including roles exempt from statutory screening.
- Provide Child Protection and Child Safety Policy, Under-18 Complaints Procedure and supervision induction; obtain staff acknowledgement.
- Monitor registration/verification notifications and expiry dates; undertake a documented register review at least each term during active programs and before each group.
- Escalate concerns promptly to the Program Coordinator and CEO. Reassign duties if status cannot be verified or safeguarding concerns emerge.
- Maintain privacy and access controls; only retain necessary details and verification outcomes, following applicable retention requirements.

8. Response to adverse results and safeguarding concerns

A barred, suspended, cancelled, negative or otherwise disqualifying status must trigger immediate cessation of affected duties, protective arrangements for students and notification to the responsible officer. Allegations, disclosures or misconduct concerns are handled under The Academy's child protection and incident procedures, including external reporting where required. A valid clearance never overrides a current safety concern.

9. Required registers and records

- NSW WWCC verification register and Queensland Blue Card/linking register, with documented exemption decisions.
- Role assessments, contract/provider screening declarations and evidence references.
- Supervisor allocation and induction acknowledgements; dates of verification and renewals.
- Restricted-access incident and corrective action records.

10. Responsibilities

- Chief Executive Officer: policy ownership, executive oversight, approval of remediation and serious-matter escalation.
- Program Coordinator: pre-program role assessments, contractor/partner coordination, supervision allocation and immediate safety response.
- Designated compliance/administration officer: online verification, linking and record maintenance.
- Staff, contractors and partners: truthful disclosures, prompt notice of status changes, adherence to screening and child safety requirements.

11. Non-compliance and review

Failure to comply may result in reassignment, disciplinary or contractual action and notification to authorities where legally required. Review annually, following a serious incident, a legislative change or a material change in delivery arrangements.

Appendix A – Pre-engagement screening decision record

Person / organisation: _____

Role and activities: _____

State and location: _____

Role is regulated child-related work? Yes / No / Further advice required

Applicable NSW WWCC / QLD Blue Card category or exemption and evidence reference: _____

Identity checked: _____ Verification/date: _____ Expiry (if any): _____

Queensland link confirmed (if applicable): _____ Reviewer: _____

Outcome: Cleared for role / Conditional restriction / Not approved

Notes, controls and next review: _____

Appendix B – Official guidance

NSW Office of the Children's Guardian: https://ocg.nsw.gov.au/working-children-check/who-needs-check

NSW employer responsibilities: https://ocg.nsw.gov.au/working-children-check/wwcc-information-organisations/role-employer-working-children-check

Queensland organisation obligations: https://www.qld.gov.au/jobs/blue-card/system/rights-and-obligations/organisations

Queensland homestay screening: https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/required/industries/child-accommodation-homestay-providers

Policy Owner

Jane Koch
Chief Executive Officer

27 October 2026

Version Control Table

Version No.	Author	Date developed/ updated	Approved by & date:	Effective date	Summary of changes
1.0	Jane Koch, CEO	13/10/2026	Marcela Haddad, PEO	13/10/2026	Initial creation
1.1	Jane Koch, CEO	27/10/2026	Marcela Haddad, PEO	27/10/2026	Minor corrections and formatting change