

# Protecting Young Workers Procedure

## Summary

This procedure outlines how Transgrid Workplace Participants can support the health, safety and wellbeing of Young Workers employed or involved in work experience programs at Transgrid.

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## 1. Purpose

This procedure outlines how Transgrid Workplace Participants can support the health, safety and wellbeing of Young Workers employed or involved in work experience programs at Transgrid.

## 2. Scope

This procedure applies to all Transgrid Workplace Participants, including employees, contractors, Suppliers, and delivery partners who interact with Young Workers at any Transgrid work site.

## 3. Definitions

Key terms and definitions relating to the corporate-wide procedure

### 1. Definitions

Term	Definition
Abuse	<p>Includes:</p> <ul style="list-style-type: none"><li>- Grooming;</li><li>- Misconduct;</li><li>- Psychological Abuse;</li><li>- Physical Abuse;</li><li>- Sexual Abuse;</li></ul>
Apprentice Support Officer	To provide first year apprentices with a dedicated, trusted contact to help them transition into the workplace in a psychologically safe way. Given that Young Workers may feel confused and / or fearful about reporting workplace misconduct, having a safe, trusted, and reliable support person encourages open communication. This will help improve reporting of workplace misconduct and the identification of barriers that exist to better understand the issues Young Workers face at Transgrid.
Care and Protection Act	Children and Young Persons (Care and Protection) Act 1998 (NSW)
Code of Ethics and Conduct	Outlines the principles, standards and values that guide decisions and behaviours within the organisation.
Contact Officer	A Workplace Participant who has been provided with additional training to provide a confidential, informal, and accessible point of contact for Workplace Participants experiencing or witnessing discrimination, harassment, or other Workplace issues. Contact Officers provide support and information on the various ways Workplace Participants can report behaviours they have

Term	Definition
	experienced or witnessed so they can be addressed accordingly.
Grievance Management and Investigation Procedure	<p>This Procedure outlines how Workplace Participants are able to raise and resolve concerns and workplace grievances.</p> <p>Any Workplace Participant who feels that they have been subjected to any form of unlawful or improper conduct (including conduct that is contrary to Transgrid's policies and procedures) may raise a grievance under this procedure.</p>
Grooming	This is a process where a person manipulates a Young Worker or group of Young Workers. They do this to establish a position of 'trust' so they can then later sexually abuse the Young Worker.
Harm	Any significant negative impact on a person's physical, psychological, or emotional wellbeing, including abuse and neglect.
Identified Roles	Has the meaning given in section 5 below.
Misconduct	This is inappropriate behaviour that may not be as severe as abuse but could indicate that abuse is occurring and would often be in breach of Transgrid's Protecting Young Worker Procedure and Code of Ethics and Conduct. This could include showing a Young Worker something inappropriate on a phone, having inappropriate conversations with a Young Worker.
Modern Slavery	Practices such as forced labour, human trafficking, and other forms of exploitation that violate human rights.
Physical Abuse	Includes physical assault, such as pushing, shoving, punching, slapping, and kicking, resulting in injury, burns, choking or bruising.
People and Culture Representative	A member of the People & Culture function who is responsible for providing guidance, support, and oversight on matters relating to employees' workplace experience.
Psychological Abuse	Includes bullying, threatening and abusive language, intimidation, shaming, name calling, ignoring isolating a person, and includes exposure to domestic and family violence.
Risk and Management Plan	A structured approach to proactively identify, assess, and control health and safety risks associated with work activities, particularly those involving young or inexperienced workers.
Sexual Abuse	This includes the sexual touching of a Young Worker, grooming, and production, distribution, or possession of child abuse material.

Term	Definition
Supplier	Any external organisation providing goods or services to Transgrid.
Workplace	A place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work.
Work, Health and Safety Representative	A member of Transgrid's Health and Safety team, responsible for identifying and addressing health and safety risks, facilitating communication between workers and management, and promoting safe work practices.
Workplace Participant	All employees, including temporary and casual employees, agents, labour hire, agency workers, contractors, and delivery partners of Transgrid, Suppliers and their employees.
WWCC Clearance	A Working with Children Check Clearance as defined in the WWCC Act.
WWCC Act	Child Protection (Working with Children) Act 2012 (NSW)
Young Worker	A person younger than 18 years of age who is employed by or involved in work experience programs at Transgrid.

## 4. Workplace Behaviour Training

Transgrid will roll out training applicable to all Workplace Participants working with and alongside Young Workers prior to working alongside Young Workers.

Protecting Young Worker training is required to strengthen the skills of Workplace Participants who are required to be aware of risk factors of Abuse occurring in a Workplace and how to respond.

Protecting Young Worker training will be provided regularly to Workplace Participants who require the knowledge for their role.

## 5. Requirements for a Working with Children Check (WWCC) Clearance

Transgrid has identified that certain roles require a current WWCC Clearance (**Identified Roles**). People who apply for an Identified Role will be notified of this requirement. A new Workplace Participant who already has a current WWCC Clearance does not need to apply for a new WWCC Clearance when starting their employment in an Identified Role. Identified Roles may change to the extent that a role becomes or no longer becomes an Identified Role.

All Workplace Participants whose roles involve direct supervision of Young Workers or work in programs or positions that support and train work experience, apprentices, trainees, and pre-apprentice workers under the age of 18 years of age, are required to have a current and valid WWCC Clearance in place prior to engaging with Young Workers, and for the duration of the tenure in the Identified Role.

The People and Culture team are responsible for the design and oversight of the systems which collect, process, and verify relevant data with the NSW Office of the Children's Guardian.

The application process for a WWCC Clearance is prescribed by the NSW Office of the Children's Guardian. For further information, visit [General information | How to apply for a WWCC | Office of the Children's Guardian](#). An application fee applies (\$107 as of 16 December 2025) which is paid for by Transgrid.

## 6. Responsibilities for Protecting Young Workers

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All Workplace Participants at Transgrid are expected to carry out the requirements specific to their role to protect Young Workers. This includes:

- Upholding Transgrid's commitment to the protection of Young Workers;
- Reading, and upholding the behaviour set out in this procedure and the Code of Ethics and Conduct;
- Meeting requirements across all other Transgrid policies and procedures;
- Taking part in our regular review of our Young Worker safety documents;
- Reporting all breaches of our policies or any allegations of Harm or Abuse to Young Workers; and
- Completing appropriate protecting Young Worker training.

Any queries relating to protecting Young Workers must be directed to a manager, a Contact Officer, the Apprentice Support Officer, a People and Culture Representative or a Work Health and Safety Representative.

Young Workers must comply with the relevant Transgrid policies and procedures, Commonwealth, state, and territory legislation on the following issues:

- a. The purchase and consumption of alcohol;
- b. The purchase and consumption of prohibited substances;
- c. Entry to licensed premises such as public bars;
- d. The purchase of adult classified products; and
- e. The purchase and use of cigarettes and or tobacco.

### 6.1 Transporting Young Workers

Best practice is to have two adults travelling with Young Workers. If this is not possible, due to vehicle capacity and availability, written guardian/parental consent will be obtained. A suitable arrangement must be made between the supervisor and the guardian/parents of the Young Worker. If a Young Worker is alone with an adult in a car they should sit in the back seat, where practical.

## 6.2 Social Media Use and Online Communication

Workplace Participants must never communicate privately with Young Workers online or on social media. Any necessary online communication must include the Young Worker's parent or guardian in the correspondence.

## 6.3 Photography and the use of Images

Photos and videos of Young Workers can only be taken with the permission of their parent or guardian. The parent or guardian must also approve any images used on Transgrid's social media channels. It is unacceptable for Workplace Participants to take photos or videos of Young Workers on personal or Transgrid devices, or to share images without permission from Transgrid and the Young Worker's parent or guardian.

## 6.4 Accommodation Requirements for Young Workers

Young Workers are to be accommodated, where physically possible, together (or within the same building if in single structured accommodation) to provide mutual support and ease of supervision by the Young Worker's supervisor. Accommodation for Young Workers must have a private bathroom. Supervisors of Young Workers are required to stay at the same accommodation venue as the Young Workers to ensure the safety and well-being of the Young Workers. The supervisor of the Young Worker is to ensure that accommodation arrangements are reviewed after an initial period of one week. Accommodation occupied by Young Workers must be checked weekly and the supervisor of the Young Worker must maintain records of the accommodation arrangements. Accommodation arrangements for Young Workers will be booked and paid for by Transgrid. Arrangements are to be made through Transgrid's booking system, CTM. Young Workers are not to travel or stay at accommodation alone.

## 6.5 After Hour Duty and/or Activities and Working Remotely

Written guardian/parental consent is required for Young Workers who participate in any work related overnight stays away from home or work remotely. Written guardian/parental consent can be provided either for each occasion or across a number of weeks or months, tasks, or supervisors. A copy of the written consent is to be retained by the supervisor of the Young Worker. The written consent is to include:

- Authorisation for the Young Worker to participate in the work arrangement;
- Medical information including emergency medical treatment consent and permission for the supervisor to seek medical help in an emergency;
- Confirmed worksite location/s and people the Young Worker is permitted to stay with;
- Travel arrangements;
- Emergency contact numbers for the parent/guardian;
- Date and time of return to their residence;

When working remotely there is to be at least two Young Worker or apprentice supervisors that are trained in protecting Young Workers. Young Workers are not to travel remotely alone.

Strong relationships with guardians/parents are essential. There are to be regular check ins and communication on details of the Young Workers working remotely and accommodation arrangements, by the Young Worker's supervisor.

## **6.6 Other Matters Requiring Parent or Guardian Involvement**

### **6.6.1 Deductions from wages**

Transgrid may require the approval of the Young Worker's parent or guardian in relation to Individual Flexibility Arrangements (IFAs) and any deductions from the employee's wages.

### **6.6.2 Counselling or disciplinary action**

The Young Worker's parent or guardian is to be informed of any formal process against a Young Worker where that process involves disciplinary action, performance counselling, or where a grievance has been made by or against a Young Worker.

## **7. Reporting Requirements**

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All Workplace Participants have the responsibility to recognise and respond to safety, welfare, or wellbeing concerns for Young Workers and to report any suspected risk of Harm concerns.

Young Workers are encouraged to disclose and report any suspected risk of Harm concerns and will be supported when doing so.

### **7.1 What to Report**

Any reasonable concerns of Harm regarding the safety of Young Workers must be reported. This includes but is not limited to reasonable concerns relating to:

- Criminal conduct;
- Abuse;
- Unacceptable behaviour that is in breach of this Protecting Young Workers Procedure and/or our Code of Ethics and Conduct; and
- Any other matter required to be reported in accordance with the Care and Protection Act.

### **7.2 Who can Report**

Any person in the Workplace who has reasonable grounds to believe that a Young Worker is at risk of Harm must report it to their manager, a People and Culture representative or a Work Health and Safety representative.

The person making the report will not be penalised. A failure to report, or preventing another person from reporting, will be considered a breach of this Protecting Young Workers Procedure, and/or Transgrid's Code of Ethics and Conduct and, potentially, section 316A of the *Crimes Act 1900* (NSW).

### 7.3 Who to Report to

Workplace Participants must report to their manager, a Contact Officer, the Apprentice Support Officer, People and Culture Representative or Work Health and Safety Representative, any reasonable concerns about a Workplace Participant's behaviour if they are not sure whether the behaviour meets the threshold of an offence (such as possible grooming behaviour).

Young Workers must speak up if they think they could be hurt at work or at risk of Harm. If a Young Worker is concerned by the behaviour of a Workplace Participant toward them, they must talk about it with their manager, a Contact Officer, the Apprentice Support Officer, People and Culture Representative, or Work Health and Safety Representative straight away.

Workplace Participants and Young Workers may at any time disclose and report to:

- their manager / team leader / supervisor
- another senior manager;
- a Contact Officer
- the Apprentice Support Officer
- a People and Culture Representative
- a Work Health and Safety Representative
- the Speak Up - Confidential Hotline on 1800 826 109

Sometimes, it will be very clear that a report to the NSW Police is required. For example, if you receive a report about sexual assault of a Young Worker, or a serious physical assault. At other times, it may be less clear. The NSW Police Force encourages all matters to be reported. It is critical that criminal allegations be reported immediately to police, as taking risk management action or commencing investigative steps before consulting with police may jeopardise a police investigation.

It is important to note that some failures to report criminal allegations to police will constitute a criminal offence.

Contact NSW Police on 131 444 for anything you consider could be a criminal offence. This includes sexual assault, physical assault, grooming offences, and producing, disseminating, or possessing child abuse material.

### 7.4 Reporting Concerns of Harm of Young Workers

All concerns of Harm must be reported to a manager, Contact Officer, Apprentice Support Officer, People and Culture representative, or Work Health and Safety representative as soon as practicable.

Once a concern of Harm has been reported, the process outlined in Transgrid's Grievance Management and Investigation Procedure is followed.

At the end of the process, the incident is reviewed, and our protecting Young Workers documents are updated, if necessary. This includes reviewing our Risk Management Plan.

## 7.5 Risk Management on Receiving an Allegation or Disclosure

It is the joint responsibility of the Work Health and Safety team and People and Culture team to conduct a thorough risk assessment upon receiving an allegation. This assessment aims to ensure the safety and wellbeing of all individuals involved, while also preserving the integrity and fairness of any potential investigation.

## 8. Privacy and Confidentiality

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Any allegation of Harm will be treated in a fair, transparent, confidential, and timely manner.

## 9. Communication and Implementation of the Protecting Young Workers Procedure

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To make sure all Workplace Participants at Transgrid are aware of this Protecting Young Workers Procedure and their reporting obligations, we will:

- hold information sessions about our Young Worker safety documents and how they apply to Workplace Participants.
- provide Workplace Participants with internal and external training opportunities for formalised training programs so they understand processes for reports and allegations.
- create and promote communications on the Wire and Transgrid's external website.

## 10. Penalties for Breaching our Protecting Young Workers Procedure

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Workplace Participants who breach this procedure may be subject to disciplinary action.

An adult in an organisation will commit an offence if they know another adult there poses a serious risk of Harm to a Young Worker (under 18 years), and they have the power to reduce or remove the risk, which includes reporting the breach, and they negligently fail to do so.

All adults in NSW are required to report information to the NSW Police if they know, believe or reasonably ought to know that a Young Worker (under 18 years) has been abused.

In the case of a Supplier, action taken will be in accordance with the severity of the Harm to the Workplace Participant and the applicable contract terms entered into by the Supplier and Transgrid.

## 11. Agreement to Abide by the Terms of the Protecting Young Workers Procedure

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All Workplace Participants must read and agree to abide by this procedure and its terms.

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## 12. Document controls:

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<b>Approver:</b>	Stephen McSweeney, Executive General Manager People and Culture				

**This procedure will be reviewed by:**

The Senior Employment Relations Advisor will review this procedure annually and after any critical incidents, to make sure our Young Worker safety reporting practices are continually improved and that we keep up to date with relevant legislation and sector requirements.

The next review date is 16 December 2026, or earlier if there are any critical incidents.

**Change from previous revision:**

Revision no	Approved by	Amendment
0	Stephen McSweeney Executive General Manager People and Culture	New procedure

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