Non-school provider Child Safe Standards

Compliance readiness tool

Purpose

The purpose of this compliance readiness tool is to provide guidance to non-school providers of senior secondary or foundation secondary courses (non-school providers) about how to comply with the new Child Safe Standards (the Standards). The Victorian Registration and Qualifications Authority (VRQA) has created this tool to assist non-school providers to review, and where necessary, update their child safety policies, procedures, and other documentation to meet the Standards.

This tool reflects the different risks in a non-school provider learning environment and recognises that regardless of where a child is being educated every child has the right to feel and be safe.

The checklist provided is not exhaustive and is general in nature. Each non-school provider’s child safety policies, procedures and documents should be contextualised to their specific physical and online environment and to their student cohort.

How to use this readiness tool and checklist

This document consists of compliance prompts and a compliance indicator checklist for developing or revising child safety policies and procedures. They are aligned to:

* the [new Child Safe Standards](https://ccyp.vic.gov.au/news/new-child-safe-standards-start-in-victoria-on-1-july-2022-to-better-protect-children/)
* the VRQA [Guidelines for non-school providers: minimum Standards for the registration to provide an accredited senior secondary or foundation secondary course](https://www.vrqa.vic.gov.au/schools/Pages/minimum-standards-non-school-settings-.aspx)

Child Safe Standards compliance checklist

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| **Child Safe Standard 1** | |
| Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued | |
| Compliance prompts   * Does your organisation provide training to staff, volunteers, and members of the governing body to understand, respect and value Aboriginal culture? * Do you actively support and encourage participation from Aboriginal students and their families? * Is racism identified and addressed with appropriate consequences? * Do you ensure that allegations of child abuse are responded to in a culturally sensitive way? | |
| Compliance indicators  The non-school provider: | |
|  | has a policy or statement that commits to the cultural safety of Aboriginal children and is publicly available |
|  | supports Aboriginal children to express and enjoy their cultural rights |
|  | provides training to staff and volunteers to ensure they understand Aboriginal culture and its importance to the wellbeing and safety of Aboriginal children |
|  | supports the participation and inclusion of Aboriginal children and their families |
|  | has established processes and procedures to ensure that racism is identified, and it is addressed with appropriate consequences (for example, contained in complaints policy and procedures or codes of conduct for students, staff and volunteers) |
|  | ensures it implements its policy and procedures to develop a culturally safe and inclusive environment that meets the needs of Aboriginal children and their families. |

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| **Child Safe Standard 2** | |
| Child safety and wellbeing are embedded in organisational leadership, governance, and culture | |
| Compliance prompts   * Does your organisation make a public commitment to child safety? * Do all levels of the organisation champion and model a child safe culture? * Does the Child Safety Code of Conduct include clear expectations for appropriate and inappropriate behaviour with children? * Has your organisation’s leadership reviewed and implemented risk management strategies to prevent, identify and mitigate risks to children and young people? * Are there clear policies and procedures for information sharing and recordkeeping and do staff and volunteers understand these obligations? * Do the governing body meetings include a standing agenda item on child safety? * Are the roles and responsibilities of the governing body, staff, and volunteers clear? | |
| Compliance indicators  The non-school provider: | |
|  | has a Child Safety Code of Conduct that includes clear expectations of behaviour for staff and volunteers and considers the needs of all students |
|  | has a Child Safety and Wellbeing Policy (providers may choose to call their policy another name) or statement that publicly commits to child safety and ensures that its governing body, leadership, staff, volunteers, students and parents or carers, are aware of it |
|  | has strategies to identify and reduce or remove the risk of abuse, for example, documented in a risk register |
|  | ensures that risk management strategies are regularly reviewed and improved and any new risks identified |
|  | ensures the governing body has oversight of child safety and the provider’s compliance with the Standards and has evidence, for example, board agendas or minutes |
|  | ensures that staff and volunteers are aware of their recordkeeping and information sharing obligations. |

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| **Child Safe Standard 3** | |
| Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously | |
| Compliance prompts   * Does the student and staff handbook, website or other resources include information about children’s rights to safety, information and participation and how to raise complaints or concerns? * Does your organisation recognise the importance of friendship and peer support and how they may help children to feel safe and less isolated? * Are children offered access to age-appropriate sexual abuse prevention programs and to relevant related information? * Is child safety training provided to staff and volunteers which includes recognising and being attuned to signs of harm to children? * Are there opportunities for students to participate in decision-making, for example, a student representative council, child safety committee or seeking feedback on policies and procedures? * Are students provided with clear information about how to raise concerns or complaints? Does the procedure ensure parents or carers participate in the process? | |
| Compliance indicators  The non-school provider: | |
|  | supports friendship and peer group programs for children to help them feel safe and be less isolated, for example, buddy for new students, student groups, encourages social connection |
|  | provides age-appropriate sexual abuse prevention programs to students and offers relevant related information |
|  | ensures children understand appropriate and inappropriate behaviour and that they know how to report concerns to the provider and external bodies (for example, the police) |
|  | provides regular training to staff and volunteers on child safety and how to be attuned to signs of harm |
|  | provides easily understood and accessible communication resources to children informing them about their rights, including to safety, information, and participation |
|  | allows students to participate in child safety and wellbeing decisions affecting them and the provider is responsive to their contributions. |

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| **Child Safe Standard 4** | |
| Families and communities are informed and involved in promoting child safety and wellbeing | |
| Compliance prompts   * Does the organisation seek input from families, carers, and communities on decisions regarding its child safety policies and procedures? * Are child safety practices, policies and procedures including how to raise child safety concerns accessible for families, carers, and communities? * Does the organisation provide families, carers and the provider community with information about their operations and governance? * Does the organisation ensure families and carers have a say in the development and review of child safety policies and procedures? | |
| Compliance indicators  The non-school provider: | |
|  | develops a policy, statement or document, or revises an existing document, that includes strategies for engaging with families, carers and communities. The provider creates opportunities for parents and carers to participate in decisions that impact on the safety and wellbeing of their child. |
|  | provides evidence that child safety policies and procedures, including how to raise complaints or concerns about the organisation, are made accessible to students’ families, carers and their communities |
|  | provides opportunities for families and carers to participate in the development and review of child safety policies and procedures, for example, via information nights, forums, newsletters and websites |
|  | provides information about their operations and governance in relation to child safety to parents, carers and the community. |

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| **Child Safe Standard 5** | |
| Equity is upheld and diverse needs respected in policy and practice | |
| Compliance prompts   * Does the organisation provide training for staff and volunteers on equity and diversity including how to support and respond to the needs of students with disabilities, from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex (LBTIQ+) children and young people? * Does the organisation provide information about diversity and equity to students through the curriculum, a student handbook, online or via other sources? * Is support provided to children who are vulnerable such as a support officer, youth worker or information about how to access support services? * Does the organisation pay particular attention to the needs of Aboriginal children and young people and promote a culturally safe environment for them? * Are the organisation’s complaints policies and procedures accessible, culturally safe and easy to understand? | |
| Compliance indicators  The non-school provider: | |
|  | develops a Child Safety and Wellbeing Policy or other document that outlines how the provider supports and responds to the needs to vulnerable children including Aboriginal children, those unable to live at home, culturally and linguistically diverse children, LGBTIQ+ and children with a disability |
|  | provides evidence that it supports and responds to the needs of Aboriginal children, those unable to live at home, culturally and linguistically diverse children, LGBTIQ+ and children with a disability, for example, though offering access to external support services, youth workers or Koorie officers |
|  | provides and promotes culturally safe environments for Aboriginal children |
|  | provides training to staff and volunteers about equity and diversity and how to support and respond to the needs of its vulnerable students. |
|  | ensures that its complaints policies and procedures are accessible, culturally safe and easy to understand. |

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| **Child Safe Standard 6** | |
| People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice | |
| Compliance prompts   * Does the organisation sight, verify and record a register of staff and volunteers’ Working with Children clearance or Victorian Institute of Teaching registration (Victorian Certificate of Education teachers)? * Does the organisation make sure job advertisements have clear statements about child safety and wellbeing including the job occupant’s duties and responsibilities, essential or relevant qualifications, experience and attributes? * Are there recruitment procedures that focus on child safety and pre-employment screening procedures relating to a person’s suitability to work with children? * Are there planned interview questions which aim to undercover an applicant’s understanding of child safety and any red flags? * Do all staff and volunteers working with children have current Working with Children clearances? * Is induction provided for all new staff, volunteers and members of the governing body that includes the Child Safety and Wellbeing Policy, Child Safety Code of Conduct, complaints policies and procedures, record management, information sharing and reporting obligations? * Do supervision and performance monitoring processes of staff and volunteers include a focus on child safety including compliance with the Child Safety Code of Conduct? | |
| Compliance indicators  The non-school provider: | |
|  | maintains a current register of staff and volunteers’ Working with Children clearance or Victorian Institute of Teaching registration (Victorian Certificate of Education teachers) |
|  | establishes recruitment and pre-employment screening processes that focus on child safety and a person’s suitability for working with children, for example, planned interview questions, police and reference checks, sighting, verifying and recording any relevant qualifications or equivalent background checks |
|  | provides an induction for all new staff, volunteers and members of the governing body that includes the Child Safety and Wellbeing Policy, Child Safety Code of Conduct, complaints policies and procedures, record management, information sharing and reporting obligations |
|  | conducts ongoing supervision and evaluation of staff and volunteers with a focus on child safety and compliance with the Child Safety Code of Conduct. |

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| **Child Safe Standard 7** | |
| Processes for complaints and concerns are child focused | |
| Compliance prompts   * Does the organisation have an accessible, child focused complaint handling policy and procedure which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different type of complaints, breaches of the Child Safety Code of Conduct and obligations to act and report? * Are the complaints policies and procedures available on the provider’s website or in its handbooks for students, families and carers, staff and volunteers? * Do the complaints policies and procedures set out the reporting, privacy and legal obligations? * Are complaints taken seriously and responded to promptly and thoroughly? * Does the organisation have policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and cooperates with law enforcement? | |
| Compliance indicators  The non-school provider: | |
|  | has an accessible, child focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of complaints, breaches of relevant policies or the Child Safety Code of Conduct and obligations to act and report |
|  | promotes and makes accessible its complaints policies and procedures to students, families and carers, staff and volunteers, via its website, student handbook, induction and recruitment resources |
|  | complies with the relevant reporting, privacy and employment law obligations |
|  | ensures all complaints are taken seriously and responded to promptly and thoroughly |
|  | ensures all children are provided with support throughout the complaints process |
|  | ensures that its policies and procedures include information about reporting of complaints and concerns to relevant authorities (for example, the Commission for Children and Young People, Victoria Police and Child Protection) whether or not the law requires reporting, and require leadership, staff and volunteers to cooperate with law enforcement. |

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| **Child Safe Standard 8** | |
| Staff and volunteers are equipped with the knowledge, skills, and awareness to keep children and young people safe through ongoing education and training | |
| Compliance prompts   * Is training and support provided to staff and volunteers about:   + how to build culturally safe environments for children   + information sharing and recordkeeping obligations   + identifying and managing child safety risks   + how to recognise indicators of child harm including harm caused by other children   + how to support and implement the Child Safety and Wellbeing Policy and Child Safety Code of Conduct   + the procedures for responding to complaints and concerns about child abuse   + ensuring staff understand their reporting obligations   + how to respond effectively to issues of child safety and wellbeing and supporting colleagues who disclose harm * Note: volunteers that work with children do not need to receive the same training as staff. Training should consider the risks and responsibilities of volunteers’ roles. | |
| Compliance indicators  The non-school provider: | |
|  | trains and provides information or support to staff and volunteers on the matters identified above |
|  | maintains a register of staff and volunteers who receive training. |

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| **Child Safe Standard 9** | |
| Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed | |
| Compliance prompts   * Is there a risk management plan or risk register that addresses the risks to children posed by the physical space, onsite and offsite settings (for example, excursions, learning with other providers, leaving campus at lunchtime or other activities that student engage in) co-located services and the online environment? * Does the provider identify and mitigate risks in the online and physical environments without compromising a child’s right to privacy, access to information, social connections and learning opportunities? * Do staff and volunteers know how to identify and mitigate child safety risks? * Is the online environment used in accordance with the provider’s Child Safety and Wellbeing Policy and Child Safety Code of Conduct? * Where the provider contracts services from third parties or children undertake part of their learning with a third party, are there procurement processes to ensure the safety of children and young people? | |
| Compliance indicators  The non-school provider: | |
|  | monitors the risks to children in online and physical environments and considers the activities undertaken, for example, excursions, learning with other providers, leaving campus at lunchtime, learning alongside adults, co-located services |
|  | has a child safety risk register or risk management plan to identify and mitigate risks |
|  | ensures the online environments are used in accordance with the organisation’s Child Safety Code of Conduct and Child Safety and Wellbeing Policy |
|  | creates procurement processes for the engagement of third parties to protect children from the risk of abuse, for example, contracts include requirements relating to child safety and identify what happens if those requirements are not met. |
|  | ensures staff and volunteers know how to identify and mitigate child safety risks, for example, through training and information. |

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| **Child Safe Standard 10** | |
| Implementation of the Child Safe Standards is regularly reviewed and improved | |
| Compliance prompts   * Does the governing body or leadership regularly review risk management controls and practices? * Does the governing body or leadership regularly review, evaluate and improve its child safety practices? * Does the organisation analyse complaints, concerns and incidents to identify causes and systemic failures to inform continuous improvement? * Are staff, volunteers, children, families and carers informed about relevant reviews and outcomes? | |
| Compliance indicators  The non-school provider: | |
|  | includes child safety practices as part of its continuous improvement processes |
|  | regularly reviews and analyses its complaints, concerns, and safety incidents to identify any systemic failures and improve child safety actions |
|  | communicates any relevant review findings to staff, volunteers, children, families, carers, and their community. |

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| **Child Safe Standard 11** | |
| Policies and procedures document how the organisation is safe for children and young people | |
| Compliance prompts   * Does the organisation have documented policies and procedures that:   + address all the Standards   + are easy to understand   + are informed by best practice professional development, research or consultation   + ensure staff and volunteers understand and implement child safety practices   + nominate champions or advocate who promote the Standards and compliance? | |
| Compliance indicators  The non-school provider: | |
|  | has documented and easy to understand policies and procedures in place that address all the Child Safe Standards |
|  | has systems in place to verify that staff, volunteers, and third-party contractors understand and implement child safety practices |
|  | develops policies and procedures using best practice models, research or consultation |