Non-school student exchange organisation Child Safe Standards

Compliance readiness tool

Purpose

The purpose of this compliance readiness tool is to provide guidance to non-school student exchange organisations (SEOs) 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 SEOs to review, and where necessary, update their child safety policies, procedures and documentation to meet the Standards.

This tool reflects the different risks in a non-school SEO’s environment and recognises that regardless of where a child is located every child has the right to feel and be safe.

The checklist provided is not exhaustive and is general in nature. Each non-school SEO’s child safety policies, procedures and documents should be contextualised to their specific student exchange program.

How to use this readiness tool and checklist

This readiness tool providesa checklist for non-school SEOs to support compliance with the Standards. The checklist is 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/)
* Guidelines for student exchange [programs](https://www.vrqa.vic.gov.au/Documents/Guidelines_Student_Exchange_Programs.docx)

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 and volunteers that work with exchange students to understand, respect and value Aboriginal culture? * Does your organisation actively support and encourage participation from Aboriginal students and their families? * Is racism identified and addressed with appropriate consequences? * Does your organisation ensure that allegations of child abuse are responded to in a culturally sensitive way? | |
| Compliance indicators  The non-school SEO: | |
|  | provides Aboriginal cultural awareness training to staff and volunteers that work with exchange students |
|  | supports exchange students to be able to express their culture and enjoy their cultural rights |
|  | documents strategies that support and encourage participation from Aboriginal children and their families |
|  | has a policy or statement that commits to the cultural safety of Aboriginal children, identifies and confronts racism and is publicly available |
|  | publishes culturally safe and inclusive child safety communication resources |
|  | implements policies and procedures to create a culturally safe environment to meet 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? * Does your organisation’s Child Safety Code of Conduct provide expected behavioural standards and responsibilities for staff, volunteers and host families? * Does your organisation implement risk management strategies to prevent, identify and mitigate risks to children and young people? * Do all levels of the organisation champion and model a child safe culture? * Do staff and volunteers understand their child safety information sharing, recordkeeping and reporting obligations? * Do governance frameworks support child safety for inbound and outbound students? | |
| Compliance indicators  The non-school SEO: | |
|  | has a Child Safety and Wellbeing Policy or statement that publicly commits to child safety |
|  | has a Child Safety Code of Conduct that provides guidelines for the expected behavioural standards and responsibilities for staff, volunteers and host families |
|  | offers inbound and outbound orientation materials to exchange students describing expected behaviours |
|  | implements risk strategies appropriate to inbound and outbound students, for example, a risk register focusing on exchange students’ welfare, safety and care |
|  | champions and models a child safety culture, for example, the organisation nominates a child safety champion to support exchange students and their host families |
|  | provides staff and volunteer training that covers their information sharing, recordkeeping and reporting obligations |
|  | documents governance frameworks that support child safety for inbound and outbound students, for example, regular reviews of the organisation’s child safety practices with the date of review included. |

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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 organisation inform exchange students about their rights including to safety, information and participation? * Does your organisation recognise the importance of friendship and peer support and how they may help exchange students to feel safe and less isolated? * Are children offered access to sexual abuse prevention programs and to relevant related information in an age-appropriate way? * Are staff and volunteers for your organisation equipped to be attuned to the signs of harm to children? * Are children encouraged to participate in child safety and wellbeing decisions affecting them and is the organisation responsive to their feedback? * Do exchange students know how to report complaints and raise concerns? | |
| Compliance indicators  The non-school SEO: | |
|  | ensures that exchange students are informed about their rights including to safety, information and participation |
|  | supports exchange students to make connections and be less isolated |
|  | supports the provision of student sexual abuse programs where relevant and other age-appropriate related information |
|  | trains staff and volunteers to help them understand, recognise and act on signs of harm |
|  | provides opportunities for exchange students to have a voice in child safety decisions affecting them and is responsive to their feedback. |
|  | supports accessible complaints mechanisms for exchange students to raise issues and report concerns. |

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| **Child Safe Standard 4** | |
| Families and communities are informed and involved in promoting child safety and wellbeing | |
| Compliance prompts   * Are families invited to participate in decisions impacting their child? * Is there two-way communication with families and the community about the organisation’s child safety approach? * Are the organisation’s child safety policies and practices accessible to families and the community? * Does the organisation involve families and the community when developing or reviewing its child safety policies and practices? * Are families and the community informed about the organisation’s operations and governance? | |
| Compliance indicators  The non-school SEO: | |
|  | creates opportunities for families and the community to participate in decisions that impact the safety and wellbeing of their child, for example, holding an SEO open day or community forum where they can provide feedback |
|  | develops a policy, statement or document that includes family and community engagement strategies about child safety |
|  | provides transparent and accessible child safety information to families and the community such as in other languages or multiple formats |
|  | consults with families and the community when developing or reviewing its child safety policies and practices, for example, via its newsletter or website |
|  | provides clear and easy to understand information to families and the community about how to raise child safety complaints and concerns |
|  | provides evidence of communication with families and the community about the organisation’s child safety operations and governance. |

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| **Child Safe Standard 5** | |
| Equity is upheld and diverse needs respected in policy and practice | |
| Compliance prompts   * Does the organisation understand exchange students’ diverse circumstances and provide support and respond to those who are vulnerable? * Are the organisation’s complaints policies and procedures culturally safe, accessible and easy to understand? * Does the organisation consider 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+)? * Does the organisation pay particular attention to the needs of Aboriginal children and young people and promote a culturally safe environment for them? | |
| Compliance indicators  The non-school SEO: | |
|  | provides staff and volunteers with training to improve their understanding of responding to the needs of students from diverse backgrounds |
|  | provides support, information and complaints processes and procedures for all students that are culturally safe, accessible and easy to understand, for example, child-centred and available in a range of different languages |
|  | supports and responds to the needs of exchange students who are living away from home including those with a disability, from culturally and linguistically diverse backgrounds, Aboriginal, and LGBTIQ+ |
|  | develops a new or existing policy, statement or document to support the SEO’s community that includes diversity and equity strategies |
|  | provides and promotes culturally safe environments for Aboriginal children. |

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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 have recruitment screening procedures to ensure that only suitable staff and volunteers work with children? * Does the organisation make sure that job advertisements contain clear statements about child safety and wellbeing including the job occupant’s duties and responsibilities, essential or relevant qualifications, experience and attributes? * Does the organisation sight, verify and record a register of staff and volunteers’ Working with Children checks or local equivalent? * Is an appropriate induction provided for all staff and volunteers about child safety that includes the organisation’s recordkeeping, 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 SEO: | |
|  | implements recruitment and pre-employment screening processes to ensure only suitable people work with children, for example, referee checks, child safety interview questions, sighting, verifying and recording any relevant qualifications or background reviews |
|  | maintains a current register of Working with Children checks or local equivalent, for all staff, volunteers and all host family members aged 18 and over |
|  | has child safety policies and procedures that specify all staff and volunteers are responsible for the safety and wellbeing of exchange students |
|  | provides an appropriate induction to all staff, volunteers and host families that includes the organisation’s Child Safety Code of Conduct, complaints processes, recordkeeping, information sharing and reporting obligations |
|  | conducts supervision of staff and volunteers with a focus on child safety and their 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 effective complaint handling policy 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 organisation’s complaints processes accessible, child focused and culturally respectful to the full diversity of the student exchange community? * Are the specific safety needs of exchange students prioritised in the organisation’s complaints policy? * 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? * Do the complaints policies and procedures set out the reporting, privacy and legal obligations? | |
| Compliance indicators  The non-school SEO: | |
|  | has an effective 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 |
|  | communicates accessible information about its complaints processes to raise complaints and describes assistance provided to exchange students |
|  | sets up communication, referral and support mechanisms for exchange students and their families as part of complaints procedures |
|  | ensures all complaints are taken seriously and responded to promptly and thoroughly |
|  | states when the organisation will report complaints to the authorities and cooperate as necessary with law enforcement |
|  | complies with the relevant reporting, privacy and employment law obligations. |

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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 child safety training, information and support provided to new and existing staff and volunteers about:   + how to build culturally safe environments for students   + information sharing, reporting and recordkeeping obligations   + identifying and managing child safety risks   + recognising 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   + how to respond effectively to issues of child safety and wellbeing and supporting colleagues who disclose harm   Note: training must be tailored to the organisation’s needs and the role that a staff or volunteer performs. | |
| Compliance indicators  The non-school SEO: | |
|  | trains, supports and provides information to staff and volunteers, including local coordinators, on the matters identified above |
|  | maintains a training register that includes records of participation by staff and volunteers including an initial child safety induction and any refresher |
|  | manages child safety risks particular to inbound and outbound exchange students |
|  | ensures staff and volunteers are aware of 24/7 procedures for handling and reporting emergency situations and critical incidents |
|  | knows how to support exchange students in host family accommodation or living away from home environments |
|  | provides simple, accessible and easy to use child safety training resources and tools for staff and volunteers. |

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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   * Does the organisation have policies and procedures in place for identifying and responding to risks to children posed by its physical and online environments? * Does the organisation address online and physical behaviour in its Child Safety and Wellbeing Policy and Child Safety Code of Conduct? * Is there a risk management plan that addresses the risks to students enrolled into the organisation’s programs? * Do third-party arrangements to procure facilities and services include child safety checks and measures? | |
| Compliance indicators  The non-school SEO: | |
|  | identifies and reduces risks created by the organisation’s structure, culture, activities, online and physical environments, and third-party arrangements, for example, consideration of the age, gender mix and cultural vulnerabilities of exchange students in all settings |
|  | implements processes to monitor online and physical interactions for use in accordance with its Child Safety and Wellbeing Policy and Child Safety Code of Conduct |
|  | creates a child safety risk management plan which covers, for example, host family environments, incidental contact, the organisation’s offices and sites, evaluating and assessing risks presented by host schools and due diligence when engaging agencies |
|  | draws up third-party contracts that include child safety conditions and consequences for non-compliance, for example, agreements with student welfare or external education providers. |

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| **Child Safe Standard 10** | |
| Implementation of the Child Safe Standards is regularly reviewed and improved | |
| Compliance prompts   * Does the organisation regularly review risk management controls and practices? * Does the organisation 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 and volunteers, students, families and the exchange community informed about the findings of relevant reviews? | |
| Compliance indicators  The non-school SEO: | |
|  | regularly reviews its child safety policies and procedures after any significant incident |
|  | regularly reviews and analyses its complaints, concerns, and safety incidents to identify systemic failures and improve child safety actions |
|  | includes child safety practices as part of its continuous improvement processes |
|  | maintains appropriate and secure records of child safety issues and concerns |
|  | identifies and manages risks for staff and volunteer roles that work with exchange students alone, without supervision or in intimate care |
|  | communicates any findings of relevant reviews to staff and volunteers, students and the exchange 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:   + meet all Child Safe Standards   + are easy to understand   + are informed by best practice models, research and stakeholder consultation   + staff and volunteers understand and implement child safety practices   + leaders model and champion to promote a safe environment? | |
| Compliance indicators  The non-school SEO: | |
|  | has documented and easy to understand policies and procedures that meet all Child Safe Standards |
|  | has policies and procedures that describe how to maintain safe exchange environments |
|  | has systems in place to verify that staff and volunteers, host families, partner organisations and third-party contractors understand and implement child safety practices |
|  | develops policies and procedures using best practice models, research or consultation, for example, conducts ongoing interviews or surveys of exchange students |
|  | nominates a child safety champion to promote, monitor and report on the organisation’s compliance |