



Working with Children Checks Policy and Procedure

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1. Introduction

Global Colleges Australia (GCA) is committed to the safety and well-being of all individuals who interact with our institution. While GCA students are not below the age of 18 years, this policy reflects GCA’s obligations as a tenant of TAFE SA, ensuring compliance with child safety requirements due to the presence of minors on the shared premises.

2. Purpose

The purpose of this policy is to ensure that all GCA staff, volunteers and contractors who work at or have access to the TAFE SA premises have undergone the necessary screening to protect children and young people from harm. Working with Children Checks (WWCC) are mandatory in accordance with this policy for relevant personnel as detailed under the ‘Scope’ section of this policy.

3. Scope

This policy applies to the following ‘relevant personnel’:

- All GCA employees, including academic and non-academic staff, who are working at or visiting TAFE SA premises.
- All contractors, subcontractors and volunteers engaged by GCA, who are working at or visiting TAFE SA premises.
- Any other individuals engaged in activities at TAFE SA premises by GCA that may involve contact with children and young people.

4. Legislative Context

This policy is in accordance with the **Children and Young People (Safety) Act SA 2017**.

Further it demonstrates an integrated approach to adhering to standards under the Higher Education Standards Framework (HESF) and the National Code. The relevant standards and GCA Policies that support this are at **Appendix 1**.

5. Definitions

Term	Definition
Child or young person	Under South Australian law a child means a person under 18 years of age. A cohort of this group aged 12 to 17 are referred to in legislation as young people.
Child-related work	Work in a specific role or environment where contact with children or young people is reasonably expected as a normal part of the duties.
Harm	Section 17 of the Children and Young People (Safety) Act SA 2017 defines ‘harm’ to mean physical or psychological harm (whether caused by an act or omission), including harm

Term	Definition
	caused by sexual, physical, mental, or emotional abuse or neglect.
Mandated Notifier	A mandated notifier is required by law to notify the Department for Child Protection if they suspect on reasonable grounds that a child or young person is, or may be, at risk of harm. This obligation arises when a mandated notifier forms this suspicion in the course of their employment (whether paid or voluntary). A mandated notifier must make the notification as soon as is reasonably practicable after forming the suspicion.
Working with Children Check (WWCC)	People working or volunteering with children in South Australia must, by law, have a valid, not prohibited Working with Children Check. A Working with Children Check is an assessment of whether a person poses an unacceptable risk to children. As part of the process, the Screening Unit will look at criminal history, child protection information and other information.

6. Key Principles

a) **Conformance with TAFE SA’s Safe Environment:**

We prioritise the safety, wellbeing, and rights of children and young people in all our activities and will conform with TAFE SA’s Safe Environment Policy.

b) **Risk Assessment:**

We assess risks related to child safety in our programs, events, and facilities. Mitigation measures are implemented to minimise risks.

We reassess and manage risks related to children and young people annually, which occurs on or around 1 July.

c) **Staff Work with Children Checks (WWCC):**

All staff are made aware of the Child Safety Act and maintain the currency of their WWCC Check.

d) **Staff Code of Conduct:**

We maintain a clear code of conduct that prohibits inappropriate behaviour towards all students of GCA and where staff whose place of work is online, and the TAFE SA Campus of young people who attend TAFE. Our code of conduct explicitly outlines appropriate behaviour towards all students and visitors to the TAFE SA campus. Breaches are addressed promptly through disciplinary procedures.

7. Policy

a) **Requirement for a WWCC:**

- i. Relevant personnel as described under the scope of this policy must hold a valid WWCC before commencing their duties.

- ii. The WWCC must be renewed every five years or as required by the respective law at the time.

b) Application Process:

- i. Relevant personnel as described under the scope of this policy will be responsible for undertaking the application process and obtaining a WWCC clearance.
- ii. The cost of the WWCC application will be borne by the relevant personnel as described under the scope of this policy.

c) Verification and Record-Keeping:

- i. GCA will verify the WWCC clearance status of all relevant personnel as described under the scope of this policy through the [South Australian Department of Human Services](#).
- ii. A record of all WWCC clearance verifications will be maintained securely and confidentially on the individual's personnel file jointly by People and Culture.

d) Non-compliance:

- i. Any relevant personnel as described under the scope of this policy who does not have a valid WWCC clearance will not be permitted to engage in activities at TAFE SA premises. Refer to the Disciplinary policy for further information.
- ii. Failure to obtain or renew a WWCC may result in suspension or termination of employment or engagement.

8. Procedures

a) Identification of Roles Requiring WWCC:

- i. People and Culture will conduct a role assessment to identify positions that require a WWCC, which will be added to a central registry of WWCC roles.
- ii. Position descriptions for identified WWCC roles will clearly state the requirement for a WWCC.
- iii. Prospective employees will be advised of the requirement for a valid and current WWCC clearance as part of the probity process prior to offer.

b) Application and Renewal:

- i. New relevant personnel as described under the scope of this policy must apply for a WWCC before commencing their role.
- ii. Current relevant personnel as described under the scope of this policy must ensure their WWCC is renewed before the expiry date.
- iii. WWCC documentation must be supplied to People and Culture, and Payroll.
- iv. People and Culture will notify staff three (3) months before their WWCC is due for renewal.
- v. People and Culture will notify staff again and their respective manager one (1) month prior before their WWCC is due for renewal, at which point the manager must follow-up with the employee and ensure the WWCC clearance is obtained in time by the employee.

c) Verification:

- i. People and Culture will verify the WWCC status using the online verification system provided by the South Australian Department of Human Services.
- ii. A copy of the WWCC clearance notice and number will be kept on file.

d) Monitoring and Auditing:

- i. Periodical audits will be conducted to ensure ongoing compliance with the WWCC requirements.
- ii. Any discrepancies or issues identified during audits will be addressed promptly, and added to the Risk Register where appropriate.

e) Training and Awareness:

- i. All relevant personnel as described under the scope of this policy will be made aware of Child Safety obligations through an online compliance training module (see Appendix 1).
- ii. Updates and reminders about WWCC obligations will be communicated to staff on a periodical basis.

f) Reporting Suspected Abuse:

- i. Any staff member who suspects child abuse must report it immediately to the designated Safety Officer/Wellness Committee and the Campus Manager. The Campus Manager then follows the mandatory reporting process (as outlined in the training at Appendix 1).

g) Responding to Allegations:

- i. We take all allegations seriously and conduct thorough investigations. If necessary, we will involve external agencies and authorities, in accordance with the Children and Young People (Safety) Act 2017.

9. Review and Continuous Improvement

We review this policy and procedure and submit annually to relevant authorities on renewal of lease on or around 1 July.

10. Roles and Responsibilities

Position	Responsibility
<p>Chief Executive Officer (CEO)</p>	<p>Accountable for ensuring that this Policy is reviewed at a minimum once every 5 years as required by the Children and Young People (Safety) Act 2017.</p> <p>Ensure that senior managers are held accountable for the implementation of this policy in their areas of oversight.</p> <p>Advise the Board promptly on any organisational risks in relation to this policy and take responsibility for managing and mitigating those risks.</p>

Position	Responsibility
	Submit information to authorities or external agencies as required.
Executive Management Team/Campus Managers	<p>Ensure this policy is implemented within their areas of control.</p> <p>Report promptly to the CEO and People and Culture any reports of suspected harm or risk of harm they become aware of.</p>
People Leaders and Supervisors	<p>Ensure that their staff have access to this Policy, have read it, and that staff are aware of their obligations.</p> <p>Ensure this policy is implemented within their areas of responsibility.</p> <p>Report any suspected harm or risk of harm they become aware of.</p> <p>Work with People and Culture to identify roles requiring a WWCC within their teams.</p> <p>Support staff in obtaining and renewing their WWCC as may be required.</p>
People and Culture	<p>Owner of this Policy and Code of Conduct.</p> <p>Stay abreast of legislative changes as relevant to this policy and procedure, and keep management updated.</p> <p>Conduct risk assessments, audits and policy reviews in accordance with this policy.</p> <p>Ensure document management and record keeping is maintained.</p> <p>Ensure all relevant personnel obtain and maintain a valid WWCC.</p> <p>Ensure relevant compliance training is being completed and review the training content as required.</p>
Payroll	<p>Maintain accurate records of WWCC Clearances and numbers in a robust document management system.</p> <p>Monitor WWCC renewals and alert staff three months in advance of forthcoming renewals. Monitor and report to managers on progress of renewals, and conduct follow-up alerts to the staff and manager at one month out of renewal.</p> <p>Escalate to manager and People and Culture of any renewals slow to progress, or at two weeks out of renewal.</p>
Staff, Contractors, Volunteers and Visitors	Responsible for being aware of their obligations under, and acting accordingly with this policy and procedure, and the

Position	Responsibility
	<p>Code of Conduct; and complete the compliance training within the required timeframe.</p> <p>Apply for and maintain a valid WWCC.</p> <p>Notify People and Culture of any changes to their WWCC status.</p> <p>Report suspected harm or risk of harm to their respective People Leader.</p>

11. Supporting Documents

- a) [Children and Young People \(Safety\) Act 2017 - South Australian Legislation](#)
- b) [Protection of children and young people](#)
- c) [Children and Young People \(Safety\) Act 2017 - South Australian Legislation](#)
- d) Staff Conduct Policy (to be written and linked)
- e) Risk Management Plan (to be updated and linked)
- f) Employment contracts (to be updated for probity inclusion)
- g) Position Descriptions
- h) Disciplinary Policy and Procedures (to be written and linked)
- i) IT user policy (To be reviewed/updated)
- j) Safety and Wellness Committee Terms of Reference and members
- k) TAFE SA Lease
- l) [TAFE Policy - Safe Environments for Children, Young and Vulnerable People](#)

12. Version Control

Policy Category	GCA
Responsible Officer	Head of People and Culture
Date of Publication	12 August 2024
Approved By	Chair Governance Board (Interim)/President (Interim)
Next Review Date	August 2025

Version #	Description of Changes	Authored by	Date Updated
1.0	New Policy	Head of People and Culture	12 August 2024

Appendix 1

Requirements	Safetrac course	TEQSA guidance note / good practice note/legal obligations	GCA policy
Section 2.3, Threshold Standards 2021 Standard 6.9, National Code	<u>Respect@Work Preventing Sexual Harassment for Leaders Training Course</u>	<u>Preventing and responding to sexual assault and sexual harassment in the Australian higher education sector</u>	<u>GCA Sexual Misconduct Prevention and Response Policy</u>
	<u>Discrimination Prevention Course</u>	Safe work place	<u>GCA Workplace Discrimination and Harassment Policy</u>
Section 2.3, Threshold Standards 2021 Standard 6.9, National Code	AU SL Creating a Child Safe Organisation (National)	<u>Preventing and responding to sexual assault and sexual harassment in the Australian higher education sector</u>	A policy is being drafted and will be presented to the next meeting of the Wellness Committee.
Section 2.3, Threshold Standards 2021 Standard 6.8, National Code	<u>General Evacuation and First Response Training</u>	Safe workplace	<u>GCA Critical Incident Policy</u>
Section 2.2, Threshold Standards 2021	<u>Diversity and Inclusion Course</u>	<u>Diversity and Equity</u>	<u>Equity and Diversity Policy</u>