

Your Working World

Child Safe Environment Policy

This policy consolidates a series of policies which have been developed and implemented by Your Working World (YWW) to create a safe online operating environment and safeguard the emotional, psychological and physical wellbeing of users. We recognise that entities have a moral and legal duty to protect vulnerable people from foreseeable harm. Preventative measures in place for users of YWW will be outlined in more detail below.

Together this group of policies and procedures assist us to:

- Undertake risk assessments and respond appropriately
- Embed an organisational culture of child safety
- Review recruitment, training and development activities
- Meet moral and legal duties to users
- Fulfil statutory responsibility to report child abuse
- Educate both adult and child users about their roles and responsibilities

We acknowledge the Child Safe Environments – Principles of Good Practice.

Our Activities

Your Working World is a website where students (children) can view the career pathways of mentors who are regular employed persons acting in a volunteer capacity. This is primarily done by students reviewing a mentors "template" which lists study, work and other relevant history that could be useful information to students as they approach making critical subject selection and career decisions. Students and mentors will **not** have direct contact with each other. Students have the ability to ask questions to mentors, however they will be submitted to YWW staff who will review and process them to a Q&A section on mentor profiles for answering. Answers from mentors will then be approved by YWW staff before becoming visible. All Your Working World staff will have clearances to work with children/vulnerable people.

Organisational Culture

We are committed to a culture that prioritises the safety and privacy of students. We also want to ensure the privacy of participating mentors such that students are not directly using our site as a gateway to contact mentors privately. For example, no links to mentor social or professional pages or other contact details.

YWW has zero tolerance of child abuse and acknowledge:

- The interests of the child are paramount
- All children have the right to feel safe and be safe using YWW resources
- All children have equal rights to protection
- All YWW staff play a role in creating a safe environment

- All YWW staff have a responsibility to protect children and young people from mistreatment

Staff Recruitment

YWW will ensure that any person applying for or currently acting in a role that has contact with students or vulnerable people are informed of our policies and procedures including our Staff Code of Conduct, reporting obligation guidance and zero tolerance of child abuse.

Any staff recruitment process will involve direct input from YWW directors and, where the recruitment is for a prescribed position, comprise at a minimum:

- A comprehensive application form
- Checks carried out to verify the applicant's identity, employment history and qualifications
- Interviews and rigorous questioning
- References checking, not only for competence but also for suitability to work with children
- Must have a positive Working with Children Check (WWCC) Assessment notice

Induction and Training

New staff will undergo an induction which emphasises duty of care, child protection and reinforces our documented policies and procedures. These will include (but are not necessarily limited to):

- Risk Management Plan
- Code of Conduct (Staff)
- Code of Conduct (Volunteers)
- Mandatory Reporting Policy
- Child Safe Environments Policy
- Privacy Policy

YWW will have frequent staff meetings (no less than one per month after becoming operational) at which discussions regarding the effectiveness of policies and procedures will be discussed as well as an analysis of any events raised for review or mandatory reports under child abuse obligations. Review of legislation regarding the identification of symptoms of child abuse, duty to report and reporting procedures will also be conducted.

Staff Code of Conduct

YWW has a Staff Code of Conduct which includes guidelines for Staff/Student Contact. Relationship boundaries are clearly explained and staff are directed to avoid behaviours and actions which could place students and staff at risk of harm or of allegations of harm. For more information please see this specific policy.

e-Safety

YWW acknowledges that, as a company acting in an online capacity, safeguards and guidelines to support and encourage cyber-safe behaviours, data and privacy protection are important elements of our operation. We intend, at a minimum, to have in place:

- Website and domain hosting and monitoring via trusted organisation
- Secure Sockets Layer (SSL) and Static IP to guarantee the security of information travelling between computers and the server
- Data encryption on stored details
- Vetting of all questions raised to ensure details are not provided inadvertently and student profiles remain anonymous
- Visible guidelines for students to identify grooming behaviour
- Code of conduct for volunteers acting as mentors that must be acknowledged at time of registration
- An up-to-date privacy policy

Risk Management

YWW has clear strategies, including policies and procedures to assess and evaluate the threat posed by risk events and the required response. Refer to more details within our Risk Management Plan.

Reporting Child Abuse

YWW considers that, given the nature of our site and the limited interaction that will occur between our staff and students, particularly physical interaction, that the capacity for us to identify suspected child abuse may be less when compared to other organisations and roles. Notwithstanding this, all staff and volunteers are made aware of their responsibility to protect the child and young people and to report child abuse through the relevant codes of conduct and our mandatory reporting policy. Please refer to these policies specifically for more information.

Register of risk events, complaints and abuse

YWW will maintain a register of events reported to staff, complaints and any reports of child abuse. This will be reviewed at staff meetings to ensure any policy changes required are implemented as efficiently and effectively as possible and to ensure we have met all required reporting obligations.

Opportunity for Relationship Development

As there is no physical contact between our adult mentors and children, no direct electronic communication and no student details visible to mentors, we feel there is a reduced opportunity for relationship development through the interaction we facilitate with volunteer mentors and students. Volunteer mentors would also need to

acknowledge and accept the Code of Conduct (Volunteers) shown to them when registering and students will have access to our documented guidance on identifying grooming behaviour. We understand that YWW staff may be required to attend presentations, meetings at schools or engage with students through marketing activities, as well as receiving and reviewing student questions. We will complete working with child clearances on YWW team members as well as implementing other induction and training programs outlined in our Codes of Conduct within this Child Safe Environments Policy to help mitigate this risk.

Ages and Abilities

YWW will be designed for high school students, particularly those towards the end of their schooling who have the ability to customise their subject path and are thinking about careers and pre-requisite requirements. As such, we expect users to be in year 7 at the earliest, however more realistically in their final years. We therefore consider the age group of children most likely to use the site to be between 15 and 17. We hope that, without discounting the underlying risk, at this age, children will be able to comprehend our advice regarding identifying grooming behaviour and have the ability to report it for review and action.

Working With Children Clearances

As outlined above, it is our policy that all Your Working World staff will have clearances to work with children/vulnerable people. Unfortunately, the policies of the various state departments are not clear with regard to the online interaction between staff and students where the two persons are in different states. Most guidance is still tailored to physical attendance in a state outside of where the clearance has been received and refers to a period of time. Refer appendix 1 for our assessment on a state by state basis as to whether YWW staff will be required to have a specific check done in a state and our justification if not. Based on advice received, where the state government wording refers to being physically located in that state, i.e. the NT governments *"You do not need a clearance if you are visiting the Northern Territory and volunteering with children for less than 14 days in a year in total"*, we will assess our requirement as if we are visiting that state (even if no staff are physically located in that state), due to the states interpretation that it is where the student is based when contact happens that determines the point of contact. Where a fixed time period applies, we will assess this as an hours equivalent spent on interaction with children (i.e. responding to questions).

Supporting Documents

Your Working World – Risk Management Plan
Your Working World – Code of Conduct (Staff)
Your Working World – Code of Conduct (Volunteers)
Your Working World – Mandatory Reporting Policy

Legislation and Resources

Relevant legislation includes but may not be limited to:

- Children's Protection Act 1993 (SA) defines child abuse, emphasizes child safety, mandates staff in education and care environments to report child abuse and neglect and requires all organisations providing education, child care or residential services wholly or partly for children to comply with principles of child safe environments. The Children and Young People (Safety) Bill 2017 has passed parliament and when enacted will replace the Children's Protection Act 1993.
- Criminal Law Consolidation Act 1935 (SA) defines illegal criminal behaviour.
- Equal Opportunity Act 1984 (SA) defines sexual harassment, prohibits other forms of unlawful discrimination including on the ground of disability and provides a complaint process through the Equal Opportunity Commission of South Australia.
- Sex Discrimination Act 1984 (Cth) as amended by the Sex Discrimination Amendment (Sexual Orientation, Gender Identity and Intersex Status) Act 2013 (Cth) defines sexual harassment and provides a complaint process through the Australian Human Rights Commission.
- Teacher Registration and Standards Act 2004 (SA) establishes and maintains a teacher registration system and professional standards for teachers such that the profession is represented by individuals who are competent educators and fit and proper persons to have the care of children.
- Disability Discrimination Act 1992 (Cth) and Disability Standards for Education 2005 (Cth) provides legal protection against disability discrimination in specified areas. The DSE states the legal obligations of service providers within the DDA and the rights of the learners with disability.
- Education and Early Childhood Services (Registration and Standards) Act 2011 provides a national legislative scheme which regulates the provision of quality education services and registration of providers for the purpose of maintaining high standards of competence and conduct by providers.

Appendix 1

We note that YWW is based in South Australia. We expect that most contact will occur with students from or via attendance at events run in SA. We do acknowledge, however, that students from other states will be able to contact our staff when they have questions to pass on to mentors or during other events. For that reason, we have reviewed the need for us to obtain clearances in other states given all staff will already have South Australian clearances:

State	Department	Clearance Obtained?	Relevant Policy	YWW Assessment
SA	Department for Communities and Social Inclusion	Yes	YWW Internal Policy Requirement	All staff (all SA based) must have clearance from DCSI
VIC	Justice and Regulation	No	Interstate visitors can do child-related work in Victoria without a Victorian Check for a period of up to 30 days in the same calendar year for: -several events or occasions with a Check from their state or territory	YWW assess that no individual staff member would, through its role with YWW, undertake more than 30 days (or 720 hours) worth of interaction with children based in Victoria in a 12 month period
ACT	Access Canberra	No	Section 12 of the WWVP Act outlines the circumstances under which a person does not need to be registered. This includes where the person: -is registered under a similar law in another State or Territory, as long as they do not work or volunteer with vulnerable people for more than 28 days in 12 months	YWW assess that no individual staff member would, through its role with YWW, undertake more than 28 days (or 672 hours) worth of interaction with children based in the Australian Capital Territory in a 12 month period
NSW	Office of the Children's Guardian	No	Interstate visitors: -can work or volunteer in any child-related work for up to 30 days a year, if the person holds an interstate Working With Children Check, or is	YWW assess that no individual staff member would, through its role with YWW, undertake more than 30 days (or 720 hours) worth of interaction

			exempt from the requirement to have such a check in his or her home jurisdiction	with children based in New South Wales in a 12 month period
QLD	Blue Card Services	Yes	Queensland does not recognise working with children checks conducted outside of Queensland	All staff must have checks completed in QLD as SA clearance not recognised
NT	Northern Territory Government Information and Services	No	You do not need a clearance if you are visiting the Northern Territory and volunteering with children for less than 14 days in a year in total	YWW assess that no individual staff member would, through its role with YWW, undertake more than 14 days (or 336 hours) worth of interaction with children based in the Northern Territory in a 12 month period
WA	Department of Communities	No	Short-term visitors to Western Australia: -applies to work carried out by visitors to Western Australia, where the person is not ordinarily resident in Western Australia; and - only applies during the two week period after the person arrives in Western Australia and cannot exceed a total of two weeks in any period of 12 months	YWW assess that no individual staff member would, through its role with YWW, undertake more than 14 days (or 336 hours) worth of interaction with children based in the Northern Territory in a 12 month period
TAS	Department of Justice	No	Registration under a corresponding law in a regulated activity that is substantially the same provides the holder with the ability to undertake that activity for a period of up to 28 days in a 12 month period	YWW assess that no individual staff member would, through its role with YWW, undertake more than 28 days (or 672 hours) worth of interaction with children based in Tasmania in a 12 month period