Commonwealth Child Safe Framework

What might implementation look like in your entity?
What is the Commonwealth child safe framework?

After early findings of the Royal Commission into Institutional Responses to Child Sexual Abuse the Australian Government committed to creating and implementing the Commonwealth Child Safe Framework (CCSF).

Obligations

The CCSF sets minimum standards for creating and embedding child safe culture and practices in non-corporate Commonwealth entities.

Under the CCSF, Commonwealth entities must:

1. Undertake risk assessments annually in relation to activities of each entity, to identify the level of responsibility for, and contact with, children and young people, evaluate the risk of harm or abuse, and put in place appropriate strategies to manage identified risks.

2. Establish and maintain a system of training and compliance to make their staff aware of, and compliant with, the CCSF and relevant legislation including working with children checks and mandatory reporting requirements.


Entities should also consider the safety of children that are involved in the services and activities they fund, and impose child safety requirements, consistent with the CCSF, on any individuals or organisations they fund to provide services or activities that involve children. This includes but is not limited to funding arrangements such as grants and procurements.

Purpose of this guidance material

Each Commonwealth entity knows its business, risks and opportunities better than anyone else. For this reason, the decision about how to implement the CCSF in each Commonwealth entity is the decision and responsibility of the Accountable Authority for each Commonwealth entity. For departments this may be the Secretary and for other entities it is the head of the entity.

This document is intended to provide practical guidance to Commonwealth entities about what implementation of the CCSF might look like in your entity. It is not intended to be solely relied upon when applying the CCSF in your entity.
What might practical implementation look like in your entity?

Each Commonwealth entity will have a different level of interaction with children, so implementation will look different for each entity. Below we provide some ideas about what practical implementation of the CCSF might look like in a Commonwealth entity.

Is there an area in your entity that has been assigned responsibility for implementing the CCSF?

For a policy to be successfully implemented everyone needs to be clear about their roles and responsibilities. Ideally, roles and responsibilities about child safety should be endorsed at a senior level to ensure clear lines of accountability and these should be articulated in your entity’s child safety policies.

Roles and responsibilities in relation to implementing the requirements of the CCSF may be shared across various areas of your entity (for example, the areas responsible for HR matters, grants, risk management and those that work with children). To support this approach you may wish to form a working group that meets regularly to roll out and monitor implementation of the CCSF in your entity.

While responsibility for implementation might be shared across various areas of an entity, entities may wish to consider whether they require a driver or champion in the entity who has overarching responsibility for implementing and promoting the policy in your entity.

Analyse the profile of your staff, work and funding activities

One of the most important things you can do to get child safety right for your entity is to analyse the profile of your staff, work and funding activities.

It is important that you have a good understanding of which of your staff are working with children, what type of work they are doing and how they are doing it. It is also important that you have a good understanding of where staff could have incidental contact (including by phone and online) with children.

A further area that it is important to understand is the services you procure and the funding you are providing to third parties and the amount of contact with children the third party will have in the delivery of the service or activity you are funding.

If you have a good understanding of your staff, work and funding activities this will be a good foundation to identify priority areas for the focus of attention, improvement of practice or risk management.
Do you have a plan for implementing the CCSF in your entity?

One of the first steps to implement the CCSF is to consider how your entity currently deals with child safety to identify:

- What works well?
- What are the gaps?
- Where is there room for improvement and action?
- What would success look like?

An introductory self-assessment tool has been developed to assist entities to consider your current child safety practices.

Have you done your annual risk assessment?

Requirement 1 of the CCSF is to undertake an annual risk assessment in relation to the activities of your entity to identify the level of responsibility for, and contact with, children and young people, evaluate the risk of harm or abuse, and put in place appropriate strategies to manage identified risks.

A risk assessment is not meaningful unless it is done regularly with outcomes assessed and acted upon. So it is important to embed the need for a risk assessment into corporate policy, accountable authority instruction or other governance regime. It is also important to ensure that the outcomes of a risk assessment are acted upon so that when areas for improvement are identified changes can be implemented.

Have you updated your risk management policy and tools?

While Requirement 1 of the CCSF requires entities to undertake an annual risk assessment to identify child safety risks and mitigation strategies, undertaking an annual risk assessment alone will not improve the safety of children. It is important to include child safety consideration in all aspects of your entity’s day to day business.

All risk assessments undertaken in your entity should consider child safety. As part of embedding child safety and wellbeing into your entity’s day to day work, it is important that all risk management policies and risk assessment tools are updated to include a component that considers child safety risks.

We suggest you include a threshold question in your risk assessment template such as:

  Does this activity involve contact with children by the Department or another party connected to the Department? Are there any other identifiable child safety risks?

If the answer to either of these questions is yes, then a full child safety risk assessment should be undertaken for the activity.
Below, is a list of child safety risks and potential mitigation strategies for consideration. The section in your entity responsible for advising on risk will be able to provide guidance.

<table>
<thead>
<tr>
<th>Risks</th>
<th>Sources</th>
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</thead>
<tbody>
<tr>
<td>Accidental Harm</td>
<td>• Unsafe physical environment, poor supervision, high-risk activities</td>
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<tr>
<td>Re-traumatisation of survivors in the workplace and vicarious trauma</td>
<td>• Practices are not trauma informed&lt;br&gt;• Support services available to staff are not well known and used&lt;br&gt;• Support services are not trained in trauma informed practices and are not appropriate to respond to victims of sexual abuse</td>
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<tr>
<td>Physical Abuse</td>
<td>• Physical punishment, physical assault, pushing, shoving etc.</td>
</tr>
<tr>
<td>Psychological Abuse</td>
<td>• Bullying, intimidation, threats</td>
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<tr>
<td>Neglect</td>
<td>• Lack of supervision, not meeting specific needs of children</td>
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<tr>
<td>Sexual Abuse</td>
<td>• Sexual assault and/or exploitation, grooming, inappropriate touching, inappropriate conversations</td>
</tr>
<tr>
<td>Cultural Abuse</td>
<td>• Lack of cultural respect, racism or other vilification</td>
</tr>
<tr>
<td>Online Abuse</td>
<td>• Grooming, abuse via texts, emails or other social media</td>
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</tbody>
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<tr>
<th>Mitigation Strategies</th>
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<tr>
<td>Safe Recruitment</td>
<td>• Reference checks&lt;br&gt;• Working With Children Checks&lt;br&gt;• Induction Processes&lt;br&gt;• Child Safety Training (trauma informed training)</td>
</tr>
<tr>
<td>Safe Environment</td>
<td>• Identified risks managed through physical intervention such as restricted access to areas with risk, removal of hazards in play areas etc.&lt;br&gt;• First aid officers appointed</td>
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<tr>
<td>Communications</td>
<td>• Appropriate policies are in place (e.g. Social Media, Privacy and Internet use)</td>
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<tr>
<td>Trauma informed practice</td>
<td>• Training for staff is trauma informed and contains a warning to staff about the content&lt;br&gt;• Staff are provided with training about vicarious trauma&lt;br&gt;• Staff are provided with appropriately trained support and assistance to deal with re-traumatisation or vicarious trauma</td>
</tr>
<tr>
<td>Responding to issues/disclosures</td>
<td>• Child safety training (trauma informed training)&lt;br&gt;• Escalation procedures&lt;br&gt;• Complaints and disclosure procedures</td>
</tr>
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</table>
Do you have a corporate child safety policy?

A corporate child safety policy is an important tool to set out your entity’s approach to promoting the safety and wellbeing of children and young people and managing risks arising through the day-to-day work of employees.

A Child Safety and Wellbeing Policy template is available to assist entities develop their policy.

A comprehensive and effective child safety policy is an important tool for meeting many of the requirements in the CCSF. A table outlining the matters that may be covered in a child safety policy is provided below.

<table>
<thead>
<tr>
<th>Matters that may be covered by your child safety policy</th>
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<tbody>
<tr>
<td><strong>Who?</strong></td>
</tr>
<tr>
<td>Be specific about who is covered by the policy.</td>
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<tr>
<td>Describe who/which sections are responsible for which aspects of child safety.</td>
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<tr>
<td><strong>Commitment</strong></td>
</tr>
<tr>
<td>Make a policy statement about your entity’s commitment to child safety.</td>
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<tr>
<td>Specify when the policy will be reviewed and improved.</td>
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<tr>
<td><strong>Consequences</strong></td>
</tr>
<tr>
<td>Specify actions and sanctions for non-compliance with the policy.</td>
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<tr>
<td><strong>Staff Screening</strong></td>
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<tr>
<td>Specify child safe recruitment and screening practices for staff that work with children, including:</td>
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<tr>
<td>- Identifying positions/roles that work with children</td>
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<tr>
<td>- Include child safety obligations in duty statements</td>
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<tr>
<td>- Have advertising and selection criteria that are specific to working with children</td>
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<tr>
<td>- Ensure behaviour based interviewing questions are asked when filling positions that work with children</td>
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<tr>
<td>- Ensure reference checks and police checks are undertaken</td>
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<tr>
<td>- Ensure working with children checks are obtained</td>
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<tr>
<td>- Ensure child safety induction training is undertaken.</td>
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<tr>
<td><strong>Training requirements</strong></td>
</tr>
<tr>
<td>It would be appropriate for your policy to specify what training is mandated for which staff members. It may be appropriate for there to be tiered requirements for staff training. Staff who work with children on a regular basis should have more training than staff who do not have any contact with children. If you have staff that work with children it may be appropriate to have one or more staff members specified as a child</td>
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National Office for Child Safety
safety officer, a person who is highly trained in working with children, can support staff in their roles and children/parents who are clients of the entity.

Your training programs should use trauma informed principles and practice to minimise re-traumatisation and provide options for people to seek support. Your training should contain a warning at the beginning to inform staff about the content and the risk that it could bring up strong feelings for them. Information about how staff can access services and support should also be included in the training.

**Behaviours**

Specify the behaviours that are expected and unacceptable from staff when working with children. Ensure staff who work with children have child safety obligations and requirements in their performance agreements. If staff work with children then you may wish to consider having these staff make a written commitment to these behaviours.

An [Example Code of Conduct](#) template which deals with some of these issues is available for entities to use.

**Compliance**

To comply with requirement 2 of the CCSF, entities must establish and maintain a system to manage working with children checks (or working with vulnerable people checks). The system must:

- Identify the roles that require working with children checks (or working with vulnerable people checks)
- Record who has a working with children check (or working with vulnerable people checks)
- Have a regime that checks that working with children checks (or working with vulnerable people checks) are current. The requirements for this may vary between jurisdictions. For example, in NSW employers can be penalised if they don’t verify that their workers or volunteers who work with children have a valid Working with Children Check. Whereas in Qld employers can apply to have certain blue card holders linked to their organisation so that they can receive notifications of changes in blue card status. Entities will need to cater their compliance regime to the jurisdictions in which their staff work with children.

Specify when and how compliance with the CCSF will be reported to the Accountable Authority/Head of the agency.

**Complaints handling**

If you do not have a separate complaints handling protocol then this should be included in your child safety policy.

**Other requirements**

Provide guidance on record keeping and information sharing.

Refer to your entities other relevant policies and guidelines.
Additional requirements if you work with children

When drafting your child safety policy keep in mind that if your entity works with children then to comply with the requirements of the National Principles you may need to:

- Ensure you have considered the physical safety of children if they will be in physical contact with staff
- Consult children and families about the content and application of the policy including risk identification and safety
- Have an education program for children about their rights
- Have a trusted adult for children to speak to about concerns
- Have a communication strategy for children and families
- Draft policies in a way that promote equity and respect for diversity. For example, by having child-friendly material in accessible languages and formats.

Have you embedded child safety in your Accountable Authority Instructions/Secretary’s instructions?

Under the Public Governance, Performance and Accountability Act 2013 (PGPA Act) the head of the entity (Accountable Authority) must establish and maintain systems relating to risk and control. It is common practice for the head of an entity to issue instructions under the PGPA Act setting out appropriate controls and directions for officials regarding compliance with finance laws and risk management (Accountable Authority Instructions or Secretary’s Instructions).

Some of the obligations in the CCSF relate to the way in which risks and resources are managed in your entity and would be appropriate to include in Accountable Authority Instructions/Secretary’s Instructions, namely:

- Requirement 1 of the CCSF is to undertake risk assessments annually in relation to activities of each entity to identify the level of responsibility for, and contact with, children and young people, evaluate the risk of harm or abuse, and put in place appropriate strategies to manage identified risks;
- where appropriate applying child safety obligations consistent with the CCSF on any individuals or organisations you fund to provide services directly to children or for activities that involve contact with children that is a usual part of and more than incidental to the funded activity. This includes but is not limited to funding arrangements such as grants and procurements; and
- National Principle 1 which requires child safety to be embedded in organisational leadership, governance and culture.
It is recommended that you include in your Accountable Authority Instructions/Secretary’s Instructions the requirement for officers and delegates to consider:

- child safety risks when undertaking all risk assessments; and
- child safety requirements when undertaking procurements, grants and other funding arrangements.

**Have you embedded child safety in your procurement policy and practice?**

The Commonwealth has committed to applying the child safety obligations described in the CCSF to Commonwealth funded third parties where appropriate including through procurement.

Child safety clauses are available for use in Commonwealth contracts through the [ClauseBank](#). However, this alone will not improve child safety in the community. To effectively extend the Australian Government’s commitment to child safety it is important that consideration of child safety is included in all aspects of the procurement process.

All entities have their own suite of guidance material and templates about how to undertake procurement within their entities. It is important that these guidance materials and templates are all updated to include child safety considerations. Some examples are provided below:

- Guidance material should include child safety concerns and how to decide if your approach to market, financial approvals and contract should include child safety considerations and obligations.
- An approval to commit money should include a section where child safety issues are considered so that it forms part of the delegate’s decision making.
- RFQ/RFT documents should put the potential supplier on notice of their child safety expectations and ask them to comment on how they are child safe.
- Contract management plans should include an aspect on how to manage the child safety obligations in the contract.

PM&C has additional [guidance material](#) on extending child safety obligations to Commonwealth funded third parties which you may find helpful.

**Have you embedded child safety in your grant policies and practices?**

The Commonwealth has committed to applying the child safety obligations described in the CCSF to Commonwealth funded third parties where appropriate including grants.

A child safety clause has been drafted for use in the Commonwealth Simple and Standard Grant Agreement [template](#), through optional Supplementary Conditions.

Like procurements, to effectively extend the Australian Government’s commitment to child safety it is important that consideration of child safety is included in all aspects of the grant process from policy development, design, selection, establishment, management and evaluation.
Guidance material and templates about how to undertake a grant within your entity should all be updated to include child safety considerations. Some examples are provided below:

- Child safety considerations should be included in the design of the grant opportunity. You should ask if the funding is for services directly to children or activities that involve contact with children that is a usual part of, and more than incidental to, the funded activity. If yes, then child safety should be considered in the design of the grant. Your guidance material should be updated to assist staff to make these decisions.

- Update your grant opportunity guidelines template to prompt staff to consider if child safety considerations should be included in your grant opportunity guidelines.

- Update your selection/evaluation documents to ensure that a grant applicant’s child safety regime is part of deciding if the grant applicant is successful.

- Ensure your guidance material requires a child safety clause to be included in appropriate grant agreements.

- Update your grant management tools to provide staff with guidance on how to manage a grant to ensure that child safety obligations are being met.

- Evaluate the success of your grant with child safety considered.

PM&C has additional guidance material on extending child safety obligations to Commonwealth funded third parties which you may find helpful.

**Have you updated your ICT policy and social media policy?**

One of the requirements of the CCSF is that the online environment promotes safety and wellbeing, while minimising the opportunity for children and young people to be harmed (National Principle 8).

Given the amount of business that Commonwealth entities now conduct through an online environment this is a key aspect of child safety for all Commonwealth entities. We recommend that you review your entities ICT policy and social media policy to ensure they:

- include specific instructions that staff are not to access or use ICT equipment to form inappropriate relationships with children and young people, undertaken online abuse, bullying, sharing of intimate images, image-based abuse, online grooming, online exploitation and abuse or misuse of personal data;

- describe how a staff member can report online safety issues or breaches of ICT policies; and

- outline how the entity will respond to a breach of your ICT policies and the sanctions that may be taken.

We also recommend that you have ICT practices in place which monitor inappropriate use of equipment or interactions which may put children at risk and have a practice in place to deal with such activity when it is discovered.

A [Checklist for online safety](#) is available to assist with steps to help keep children and young people safe online.
Do you have the right staff?

One of the requirements of the CCSF is that staff working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice (National Principle 5).

This requirement is aimed at recruitment and screening of staff and contractors. This is of particular importance for roles where staff work directly with children, but are also important to consider in relation to roles that may implement your child safety obligations in the entity (e.g. security officers, complaints handling staff, trainers and HR officers).

You should ensure that your entity identifies staff and contractors who will have direct contact with children. This will involve analysing the type of work your entity does and which roles have contact with children. For roles that will have contact with children you should:

1. Ensure that your recruitment activities are child safe.
   - When advertising the role emphasise that the position will work with children and that your entity is child safe. Be specific about the experience and qualifications the position requires. Outline the screening processes that the applicant will need to undertake. This is aimed at encouraging the right people to apply and deterring the wrong people.
   - When interviewing staff for roles working with children include child-safe interview questions for all roles working with children (including existing staff within the organisation who are applying internally). For example, ‘Have you worked/volunteered with children previously? What did you like about it? What did you find difficult?’ and ‘This department is a child-safe organisation. What do you think that means?’
   - Always undertake rigorous pre-employment screening. Speak to referees and ask the referees about the person’s experiences and interactions with children. Undertake criminal history/police checks (including existing staff within the organisation who are applying internally). Consider if criminal history/police checks should be redone on a regular basis. Ensure that the person has the relevant working with children check (or equivalent) for the jurisdiction in which they will be working.
   - Ensure that as part of the employment contract the person is required to remain suitable to work with children including the ability to retain a working with children check (or equivalent).
   - The Department of Foreign Affairs and Trade has a very good Child Protection Guidance Note on Recruitment and Screening which may be helpful in developing child safe recruitment activities in your entity.

2. Once you have the right staff ensure that you continue to have child safe practices:
   - All staff receive an appropriate induction and are aware of and understand their responsibilities to children and young people, including record keeping, information sharing and mandatory reporting obligations.
• Require staff to confirm compliance with core entity policies and procedures.
• Ongoing supervision and people management is focused on child safety.
• Assign a mentor for a period of time to provide support, guidance and supervision on working safely with children within the organisation.
• Manage supervision and performance reviews. Make child safety requirements a part of a performance plan and supervisor discussions for staff who work with children.

3. Put in place processes that embed child safety in your entities’ practices. For example, make it part of creating a new position or advertising for staff that you need to consider if the position will work with children.

*Is the right training available for the right staff?*

There are two requirements in the CCSF that relate to training:

• Requirement 2 specifies a requirement to establish and maintain a system of training and compliance to make staff aware of, and compliant with, the CCSF and relevant legislation, including working with children checks and mandatory reporting requirements; and
• Entities are required to ensure staff are equipped with the knowledge, skills and awareness to keep children and young people safe through information, ongoing education and training (National Principle 7).

It may be appropriate for there to be tiered requirements for staff training. Staff who work with children on a regular basis should have more training than staff who do not have any contact with children. It should be clear to staff from your child safe policies what their requirements are for training. Training should be trauma informed (see below).

For staff that do not work directly with children your training requirements may be met by having an ongoing communication program where:

• staff are informed of the CCSF as a whole-of-government policy;
• staff are aware of your agencies policies in relation to child safety, funding third parties who work with children (grants and procurements), ICT policy and complaints handling protocol;
• child safety considerations are embedded in the day-to-day business of your agency. This is an effective way of ensuring staff are aware of the CCSF and other child safety matters. For example, ensuring that procurement templates prompt staff to consider child safety at decision making points in the procurement process.

For staff that work with children you should have a regime of ongoing training. It will be important for staff to be given sufficient time in their work programs to attend to their ongoing training needs. It would also be appropriate for such staff to have access to professional memberships, supervised peer discussions, team training days and access to research and publications on child safety.
We would expect that training may include:

- a warning that the content of the training may be confronting;
- legislative requirements for working with children checks (or equivalent) and mandatory reporting requirements in the jurisdiction in which they work;
- awareness of the entities child safety and other relevant policies;
- attendance at professional seminars;
- how to identify indicators of child abuse or harm;
- online safety risks that your organisation may have to deal with and how to identify them;
- how to respond effectively and in culturally appropriate ways to children and young people and their families;
- the rights of children and young people;
- how to support your colleagues; and
- where to get additional information and support.

The Australian Government has commissioned the Australian Human Rights Commission to develop training resources which will be available later in 2019.

Ensure your training is trauma informed.

Training about child safety issues can be confronting. It can be a trigger for re-traumatisation for some people, including staff who are survivors of child abuse themselves or have a close family member including a child who is a survivor or victim of child abuse.

Your training programs should use trauma informed principles and practice to minimise re-traumatisation and provide options for people to seek support. In general terms, trauma informed training could be described as training that is based on an understanding and knowledge of how trauma can affect people’s lives and needs. Trauma informed training should be based on not re-traumatising or blaming survivors/victims. Further information about trauma informed practice is available from the Australian Institute of Family Studies.

Some practical tips on how you can use trauma informed principles in your training regime are:

- Before you commence the training session (whether online or in person) have a warning at the beginning to inform staff about the contents of the training and that it could bring up strong feelings for them. Two examples of content warnings are provided below and can be adapted to your needs:

  Example 1: Please take a moment to think about your personal values, thoughts and beliefs around issues such as child abuse and sexual abuse – towards both those who have experienced sexual abuse and offenders. Child abuse can be a confronting issue for many people. If the content upsets you or brings up personal issues we encourage you to seek support from...
Example 2: Some of the content of this training session and the child protection policy can be confronting. If, after this session or at any time during the course of your work, you feel concerned or troubled by something you have read, heard or seen, please contact ... If your matter is urgent, please contact xxx.

If you do not feel comfortable staying for this session, it is ok for you to leave the room. Please let the facilitator know that you are leaving. He/she will accompany you and ensure that you are safe.

Self-care is important, some tips on self-care are available at http://au.reachout.com/what-is-self-care

- If staff do not work with children or have any contact with children, you may wish to consider giving staff the option of not undertaking the training if they believe it will bring up strong feelings for them. You could instead simply make these staff aware of the policies around child safety and the existence of the Framework. Staff that work with children will need to undertake ongoing appropriate trauma informed child safety training.

- It may be appropriate to provide staff with access to information about the services and support available to them if they need it.

- You may wish to consider having services and support that is from those qualified to deal appropriately with survivors of sexual abuse (you may need to speak to the provider of your employee assistance program to ensure that they offer appropriate services to meet the needs of your staff).

There are also risks that staff will suffer from vicarious trauma, this is the effect of trauma exposure on professionals that work with traumatised clients and their traumatic experiences. The effects of vicarious trauma can be similar to that experienced by the primary survivor/victim, for example anxiety, depression, fear, grief, despair and sleeping problems to name a few. It is important to provide support for staff that may be experiencing, or at risk of experiencing, vicarious trauma. More information about vicarious trauma is available from the Australian institute of Family Studies.

Do you have a compliance regime in place?

A compliance regime is important to ensure that child safety is being implemented and improved in your entity which will in turn make your entity child safe. Having a compliance regime is connected to three requirements in the CCSF:

- the requirement to establish and maintain a system of training and compliance to make staff aware of, and compliant with, the CCSF and relevant legislation, including working with children checks and mandatory reporting requirements (Requirement 2);

- Principle 9 requires implementation of the National Child Safe Principles is regularly reviewed and improved; and

- Principle 10 requires policies and procedures to document how the organisation is safe for children and young people.
This relates to both compliance with the requirements of the CCSF and compliance with relevant legislation applying to staff in the state/territory jurisdiction in which they work.

- For compliance with relevant legislation you will need to:
  - identify the roles that require working with children checks (or equivalent);
  - record who has a working with children check (or equivalent); and
  - have a regime that checks that working with children checks (or equivalent) are current. The requirements for this may vary between jurisdictions. For example, in NSW employers can be penalised if they don’t verify that their workers or volunteers who work with children have a valid Working with Children Check. Whereas in Qld employers can apply to have certain blue card holders linked to their organisation so that they can receive notifications of changes in blue card status of their staff. Entities will need to design their compliance regime to meet the requirements of the jurisdictions in which their staff work with children; and
  - for staff that work with children keep records of training attended by those staff.

**Reporting on compliance**

Accountable Authorities are responsible for implementation of the CCSF within their entities. It is recommended that Accountable Authorities assure themselves on an annual basis, that the requirements of the CCSF are being met within their agency. Entities can establish their own arrangements for providing this assurance.

PM&C has developed a [self-assessment tool](#) that may provide assistance in assessing and reporting to Accountable Authorities your entity’s compliance with the CCSF.

**Do you need child safe officers?**

For Commonwealth entities that have staff that work with children you may wish to consider if you should appoint child safe officers in your entity.

The role of child safe officers in your entity, will be unique to your entity, but some of the functions they may perform include:

- act as a source of support, advice and expertise to staff and children on child safe issues;
- liaise with leaders in your entity to raise awareness of child safety in your entity;
- be aware of the specific needs of children that your entity works with;
- keeping skills up to date and provide trauma informed training to staff about their obligations and to children about their rights;
- provide referrals for staff and children who need additional support;
- assist staff and children to make complaints about child abuse or harm;
- keep accurate written records of complaints and referrals;
• ensure staff and children have access to and understand child safe policies and procedures; and
• promote trauma informed training opportunities for staff working with children.

Do you have a complaints handling process for responding to reports of child abuse or harm?

One of the requirements of the CCSF is to have processes to respond to complaints and concerns are child focused (National Principle 6).

Staff may in the course of their work become aware of child abuse or harm. This could be by indirect means such as through Ministerial correspondence or an email to a departmental inbox. It is also possible, that staff could receive a phone call from a child or person who is reporting suspected child abuse. Staff who work with children may also become aware of suspected child abuse through direct observation or knowledge.

To meet this requirement of the CCSF you will need to have a child focused complaint handling policy which clearly outlines the roles and responsibilities of leaders and staff when dealing with different types of complaints. Effective complaints handling protocols include:

• a description of what is child abuse and harm;
• how complaints can be made;
• the process for dealing with complaints (where complaints are taken seriously, and responded to promptly and thoroughly);
• how it is linked to breaches of relevant policies or the Code of Conduct where it involves an allegation against a staff member;
• mandatory reporting requirements to law enforcement and child protection authorities and the implications of non-compliance;
• what to do if the person disclosing the child abuse does not want you to tell the police (consider the role of blind reporting);
• how to report to authorities; and
• how to meet record keeping and privacy obligations.

Have you consulted staff, children and their parents/guardians? Do you need to publish your child safety regime?

National Principles 2, 3 and 4 are about taking child participation seriously, involving families and communities and respecting equity and diversity.

Some of the important components of implementing these Principles is that:

• children and young people are informed about their right to safety, how to make complaints and where to seek help;
• when developing policies you involve staff, children, young people and their families. This will help ensure that everyone is informed, better protected, empowered to act, and has the opportunity to receive help and support;

• policies are made publicly available to the community;

• you have a mechanism by which community members can provide feedback and observations about policies; and

• policies are written in a culturally safe, accessible and easy to understand way.

The degree to which you can meet these requirements will largely depend upon the level of contact your entity and staff directly have with children. However, all entities can:

• have policies that are written in a way that is culturally safe, accessible and easy to understand; and

• consider if it is appropriate to publish information about the level of contact their entity has with children, what their child safety policies are and how they implement the requirements of the CCSF. This demonstrates leadership by publicly demonstrating the entities commitment to child safety and wellbeing.

Where can I get help?

Further information and support is available, please contact the National Office for Child Safety CommonwealthChildSafe@pmc.gov.au