

Name of Procedure	Protecting Children and Vulnerable Adults Procedure
Description of Procedure	<p>These procedures set out the processes, procedures and responsibilities to ensure that the University meets its commitments to provide a safe environment for children and vulnerable adults in accordance with the Protecting Children and the Vulnerable Policy.</p> <p>Section 7 of these Procedures provides information about reporting and responding to concerning behaviour towards children or vulnerable adults and includes the following instructions:</p> <ul style="list-style-type: none"> • If a child or vulnerable adult is being (or in imminent danger of being) harmed, contact the Police (telephone 000) and notify ACU National Security Centre (telephone ext 8888 or 1300 729 452), or a person in a position of authority within ACU (eg supervisor, manager or coordinator). • If child abuse and/or neglect is witnessed or suspected contact the relevant state or territory child protection agency listed in the Procedures and notify ACU National Security Centre (telephone ext 8888 or 1300 729 452) or a person in a position of authority within ACU (eg supervisor, manager or coordinator).
Procedure applies to	<input checked="" type="checkbox"/> University-wide <input type="checkbox"/> Specific (<i>outline location, campus, organisational unit etc.</i>) <hr/> <input type="checkbox"/> Staff Only <input type="checkbox"/> Students Only <input checked="" type="checkbox"/> Staff and Students
Procedure Status	<input checked="" type="checkbox"/> New Procedure <input type="checkbox"/> Revision of Existing Procedure

Approval Authority	Vice-Chancellor and President
Governing Authority	Chief Operating Officer
Responsible Officer	Director, Human Resources

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* Unless otherwise indicated, this policy will still apply beyond the review date.

**Related Policies, Procedures,
Guidelines and Local Protocols**

Protecting Children and Vulnerable Adults Policy
Code of Conduct for All Staff
Research Code of Conduct
Children of Staff and Students on University Premises Policy on
Course Approval, Amendment and Review (Award Courses)
Student Conduct and Discipline – Policy and Procedure
Guidelines for Course Approval, Amendment and Review (Award
Courses)
Recruitment and Selection Policy and Procedures
Acceptable Use of IT Policy
Risk Management Policy and Procedures
WHS Risk Management Guidelines
ACU Staff Enterprise Agreement 2017 - 2021
Critical Incident Management Policy and Procedures
Workplace Bullying Policy and Procedures
Bullying in the Working or Learning Environment
Satellite Centres Policy

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1 Introduction

The Protecting Children and the Vulnerable Policy (the Policy) sets out ACU's commitments to provide a safe environment for children and vulnerable adults.

These procedures outline the processes, procedures and responsibilities to ensure that the University meets the commitments within the Policy. These procedures are intended to guide the practical application of the Policy in the following areas:

- processes for approval of activities related to children and/or vulnerable adults;
- risk planning and management;
- background checking;
- consent from a parent or guardian for participation in ACU activities;
- reporting and responding to concerning behaviour; and
- roles and responsibilities.

2 Definitions

The meanings of the terms used in these Procedures are provided in Attachment 1.

3 Processes for Approval of Activities Related to Children and/or Vulnerable Adults

The Policy provides descriptions and examples of activities, involving children and vulnerable adults, which are categorised as work, study, research or events. All activities involving children and/or vulnerable adults must be approved by the appropriate authority (refer to the table below). In addition there are matters to consider and actions to take in conjunction with the approval process.

The University Member responsible for the delivery of an activity (to be referred to in these procedures as the Responsible Officer – refer to the table below) will consider whether the activities are related to children or vulnerable adults and, if so, take actions to provide a safe environment for them including by ensuring that the following matters are considered and actions taken:

- the activity is approved as “an activity related to children or vulnerable adults” by the appropriate approval authority;
- a Risk Management Plan specific to the activity is developed, approved and implemented;
- background checks are conducted in accordance with requirements of the relevant state or territory, if required; and
- the consent of parents or guardians is obtained, if appropriate.

Below is a list of Responsible Officers for the different categories of activities involving to children and/or vulnerable adults (i.e. work, study, research or events). Attachment 2 provides information about the role of the Responsible Officer in providing a safe environment for children and vulnerable adults involved in ACU activities.

Activity Category	Applies to the following University Members	Responsible Officer	Approval Authority
Work - excluding research and events (refer below)	<ul style="list-style-type: none"> • Staff • Affiliates 	Supervisors and managers In the case of Committee members who are not ACU staff, the Committee Chair will fulfil this role	Where applicable, in accordance with the Delegations of Authority Policy and Register
Study - excluding research and events (refer below)	Students (undergraduate and postgraduate)	National Head of School in conjunction with the Lecturer in charge of the unit	In accordance with the Policy and Guidelines on Course Approval, Amendment and Review (Award Courses), Academic Board or Faculty / unit approval process for minor unit changes.
Research	University Members involved in research including higher degree research supervision	Chief investigator for research projects Supervisor for HDR student	Human Research Ethics Committee
Events - organised by University member(s)	University Members	ACU members who are organisers of events.	Relevant members of the Executive (or nominee)
Events - organised on an ACU site by or for an external person or organisation	Visitors and members of the public	State Facilities Manager in conjunction with the organisers of events.	For venue hire or use Associate Vice-Chancellors or Campus Deans (or the Provost for the Rome Centre)

4 Risk Planning and Management

The Policy requires the development, approval and implementation of a Risk Management Plan for all activities involving children and/or vulnerable adults to ensure that the risks to their safety and wellbeing are removed or minimised. Examples of sources of hazards from which risks may arise are listed below (this is not a comprehensive list):

- the age or age range of children and/or nature of the disadvantage of vulnerable adults
- safety of location and facilities;
- nature of the activity;
- the suitability of University Members to engage in activities with children and/or vulnerable people;
- capacity of University Members to predict, respond to and manage the behaviour of the children and/or vulnerable adults, other University Members and others involved in the activity;
- equipment required for the activity and its suitability;

- accessibility of location including the ability to find the location on the way to or during the course of the activity;
- accidents and injury;
- theft, loss or damage of personal property;
- the serving of food and/or alcohol;
- consent of parents or guardians (see section 6) to the participation of the child or vulnerable adult in the activity and/or assent of child or vulnerable adult to be involved in the activity; and
- photography and/or filming of the activity by organisers and/or participants including on personal electronic devices.

The Risk Management Plan will identify the risks associated with each of the hazards and document the likelihood and severity of the risks as well as strategies to mitigate the risk. The [ACU Risk Management Policy and Procedure](#) and [ACU WHS Risk Management Guidelines](#) may assist in developing the Risk Management Plan. The National Child Protection Manager, Human Resources Directorate may be able to assist with risk planning and management.

5 Background checking - WWC/V checks

ACU's commitments in relation to background checking are outlined in the Policy. This section sets out how the University will meet its commitments in relation to WWC/V checks.

5.1 When is a WWC/V check required?

The legislation and regulation within each state or territory prescribes the criteria to be met in order for a WWC/V check to be conducted. The criteria are different within each jurisdiction and can be categorised in terms of:

- the nature or type of contact with children or, in the ACT, vulnerable people (e.g. direct contact);
- roles, occupations or sectors which are considered to be related to children (vulnerable people in the ACT); and
- the frequency of contact with children (vulnerable people in the ACT) over a prescribed period(s) (e.g. week, month or year).

The criteria in relation to the above, prescribed by the relevant state or territory government agency, must be met for a WWC/V check to be performed. In other words, if the criteria are not met then the agency may not perform the WWC/V check. The website for the relevant state or territory government agency should always be consulted when determining whether a WWC/V check is required and an individual should only be required to undertake a WWC/V check if the relevant criteria are met. A list of websites for these agencies is maintained on the [ACU Working with Children and Vulnerable Adults Webpage](#).

The activities to which legislative requirements in relation to WWC/V checks apply are more narrowly defined than those covered by the Policy and these Procedures. Where an activity is approved as an activity related to children and/or vulnerable adults by the appropriate approval authority (refer to section 3) but the nature of the activity is such that the state or territory government agency does not require a WWC/V check, the following may authorise a background check in the form of a police check, if considered to be appropriate:

- for students - Executive Dean or relevant Executive member for non-Faculty areas with students (e.g. Executive Education and ACUCom),
- for other University Members - the Director Human Resources.

5.2 WWC/V check clearance and identifying an Organisational Contact Officer for ACU

When a University member has undertaken a WWC/V check for another purpose or organisation, their WWC/V clearance may, depending on the nature of the check, be carried over to ACU. If the University member does not have an existing WWC/V clearance then an application for a WWC/V check will need to be made.

5.2.1 Application process

Each state or territory has a different process for applying for a WWC/V check and information about the process is provided on the website of the relevant state or territory government agency (herein referred to in this section 5 as Agency) (refer to the [ACU Working with Children and the Vulnerable Adults Webpage](#) for a list of websites for these Agencies).

When an application for a WWC/V check is lodged, an ACU Organisational Contact Officer should be identified on the application (refer to section 5.2.3). When the University Member is notified of the outcome of their WWC/V check application by the Agency, the University Member is responsible for providing evidence of the outcome of the application to the relevant ACU Organisational Contact Officer.

5.2.2 Existing WWC/V clearance (portability)

Same state or territory: In most jurisdictions in which ACU operates (South Australia excluded) existing WWC/V clearances are portable across different organisations within the same state or territory provided the “category of clearance” is the same. The categories of clearance are different in each jurisdiction but generally, a WWC/V clearance as an unpaid person (e.g. volunteer or student) cannot be used for paid employment.

Different state or territory: WWC/V clearances are not always portable across states or territories. University Members with a WWC/V clearance in one state or territory cannot rely upon that clearance to participate in ACU activities with children or vulnerable people in a different state or territory. University Members may be required to hold WWC/V clearances in more than one state or territory even though they are performing activities for ACU as one organisation.

5.2.3 ACU Organisational Contact Officers for WWC/V checks

The WWC/V check application process in all states and territories captures:

- the name of the organisation in which the activities with children (vulnerable people in the ACT) are conducted, and

- the name of an Organisational Contact Officer.

This ensures that the relevant state or territory government agency can contact ACU directly to advise of any changes in a University Member's WWC/V clearance status. ACU is then in a position to take immediate action if the clearance is suspended or revoked (refer to 5.6 below).

In the case of a University Member with an existing WWC/V clearance, the Agency must be notified that the University Member is with ACU.

The Organisational Contact Officers are:

Category of University Member	Organisational Contact Officers
All University Members excluding students	HR Service and Support, Human Resources
Students	Nominees of the Executive Dean or relevant Executive member for non-Faculty areas with students
Students undertaking research involving children and vulnerable adults	Research Ethics Manager (non-student University Members should be referred to HR Service and Support, Human Resources)

The [ACU Working with Children and the Vulnerable Adults Webpage](#) provides a list of the names of the Organisational Contact Officers.

5.3 Cost

Normally, the University Member is responsible for meeting any cost involved in applying for WWC/V checks. This also applies to police checks and professional registrations.

5.4 Timeframe for applying for WWC/V checks

For any activity for which a WWC/V check is undertaken, the University Member must not commence that activity until the checking process is concluded and evidence of clearance is provided to and, if required, validated by the relevant Organisational Contact Officer (refer to Attachment 3 for actions required by the Organisational Contact Officer). This applies to new or existing University Members.

The application process may take up to several weeks, depending on the jurisdiction and this should be accommodated in the planning for the activity (refer to section 5.6).

5.5 Duration and maintaining of WWC/V clearance

Within the jurisdictions applicable to ACU, WWC/V clearances are in place:

- normally for three (3) or five (5) years and until a specified expiry date, depending on the jurisdiction, or
- until the clearance is suspended or revoked by or in accordance with the Agency requirements.

University Members and ACU share responsibility for ensuring that University Members engaged in activities related to children (vulnerable in the ACT) have current and valid WWC/V clearances. The responsibilities of each are:

- The University Member is responsible for ensuring that their clearance is valid and that they apply for renewal in accordance with the requirements of the relevant state or territory Agency. They are also responsible for informing ACU of changes to their WWC/V clearance status.
- ACU is responsible for ensuring that anyone involved in an activity related to children (vulnerable in the ACT) has and continues to have clearance to do so.

As stated in the Policy, from time to time the WWC/V clearance status of University Members will be audited, as determined by the Chief Operating Officer.

5.6 Failure to obtain or suspension/removal of WWC/V clearance and subsequent action by ACU

5.6.1 Failure to obtain a WWC/V clearance – new University Members

A University Member who fails to obtain a WWC/V clearance must not engage in activities related to children (vulnerable people in the ACT). Where a WWC/V clearance is a prerequisite for engagement, appointment or enrolment, the person **will not commence** with ACU until evidence of the clearance is provided.

If an existing University Member is required to undertake a WWC/V check in order to engage in activities related to children (vulnerable people in the ACT) and fails to obtain a WWC/V clearance, then the arrangements set out in section 5.6.2 below will apply.

5.6.2 Failure to obtain, suspension, removal or expiry of WWC/V clearance – existing University Members

This section applies when:

- An existing University member is required to apply for a WWC/V check to obtain a clearance in order to participate in activities related to children or vulnerable adults (e.g. as an outcome of a change to their position or involvement in an event), and then fails to obtain a WWC/V clearance.
- ACU is notified by the relevant Agency or University Member that a University Member's existing WWC/V clearance has been suspended or removed during the period of the WWC/V clearance.
- A University Member advises ACU of a change to their police information. In this case, the University Member is not required to disclose any details related to the change to their police information to ACU unless required to do so to comply with the Code of Conduct for All Staff.
- Following routine monitoring or re-validation processes it is found that a University Member's WWC/V clearance has been suspended or removed, or has expired.

In any of the above circumstances, the University Member will be removed from the activities involving children (vulnerable people in the ACT) immediately (and in accordance with the requirements of the relevant jurisdiction).

Organisational Contact Officers (refer to section 5.2.3) should be the recipients of all notifications of failure to obtain, suspension, removal or expiry of WWC/V clearances, and disclosures regarding changes of police information. Upon receiving such notifications, the Organisational Contact Officers must act immediately to refer them to the following.

ACU Officer	Category of University member
Deputy Vice-Chancellor (Research), referred to as DVC(R)	a higher degree research student
Executive Deans of Faculties and relevant Executive member for non-Faculty areas with students	all other students (i.e. not higher degree research students)
Director Human Resources	for any other University Member

The process for taking action is represented diagrammatically in Attachment 5.

Immediately upon receiving notification of the failure to obtain or suspension or removal of a WWC/V clearance (normally from an Organisational Contact Officer), the DVC(R), Executive Deans/ relevant Executive member for non-Faculty areas or Director Human Resources will, directly or through the relevant manager, advise the University Member that they must be removed from the activities involving children (vulnerable people in the ACT). Such communication may be verbal, in the first instance, but will be confirmed in writing.

The mechanism for removal of the University Member from the activities will be determined on a case by case basis and may include one or more of those listed below. Further information about the consideration and actions of the DVC(R), Executive Deans/ relevant Executive member for non-Faculty areas or Director Human Resources is provided in Attachment 4.

- Exclusion or suspension pending the outcome of:
 - the process of consideration by the DVC(R), Executive Deans/ relevant Executive member for non-Faculty areas or Director Human Resources; or
 - an investigation by the police and the relevant state or territory government agency in relation to the matter which has resulted in the suspension of the WWC/V clearance.
- For students, an inability to complete course requirements.
- Redeployment or re-allocation of activities to ensure that the University Member has no involvement in activities or contact with children or vulnerable adults.
- Termination of appointment for University Members other than students.

5.7 Record-keeping, Privacy, Confidentiality and Disposal

5.7.1 Record-keeping

The Organisational Contact Officers are responsible for records relevant to WWC/V checks in accordance with Attachment 3.

5.7.2 Privacy and confidentiality

Reasonable steps must be taken to protect the personal information contained within the documents pertaining to WWC/V checks and other background checks from misuse, loss, unauthorised access, modification or disclosure. It may be unlawful to disclose information about WWC/V checks to third parties without the permission of the person who is the subject of the check.

5.7.3 Disposal

Documents pertaining to WWC/V checks and other background checks must be retained and disposed of securely and in accordance with ACU [Records Retention and Disposal Schedule](#) and [Records and Archive Management Policy](#).

6 Consent from a parent or guardian for participation in ACU activities

There are circumstances where consent is required from a parent or guardian of a child or vulnerable adult. This should be considered as part of the Risk Management Planning process for activities involving children and/or vulnerable adults.

Consent must be obtained in advance of an activity. Some examples of activities for which consent may be required are listed below:

- Participation of ACU students who are under 18 in field trips, professional practice placements, community engagement, sporting activities, overseas pilgrimages, conferences, etc.
- Children accessing services through ACU Health Clinics.
- Children involved in research.
- Visits by a school or community group (consent would normally be arranged and managed by the school or community group; however, if not then the Responsible Officer must ensure that consent is obtained).
- Participation of children in ACU hosted or badged forums, conferences, etc.
- Any of the above arrangements for vulnerable adults with a legal guardian.

The consent form should include the following:

Information provided to the parent or guardian	Information sought from the parent or guardian
<ul style="list-style-type: none"> • a description of the activity and those involved • measures taken to protect safety and wellbeing of those involved • contact details of University Member(s) for further information prior to the activity and during the activity • expectations of behaviour including reference to Student Conduct and Discipline Policy for ACU students under 18, or Code of Conduct for All Staff for others • information about the Protecting Children and Vulnerable Adults Policy and Procedures. 	<ul style="list-style-type: none"> • consent to attend • consent for ACU to use and/or retain any images (photographs or video) or sound recordings, if applicable • confirmation of the relationship with the child or vulnerable adult • relevant information about medical conditions and health needs • special dietary requirements, allergies and/or anaphylaxis, if applicable • emergency contact details

Reasonable steps must be taken to protect the personal information contained within the signed consent forms from misuse, loss, unauthorised access, modification or disclosure. The Responsible Officer will ensure that the signed consent forms are retained for the following period and disposed of securely and in accordance with the ACU [Records and Archive Management Policy](#):

- consent for participation in events and activities - seven (7) years after the activity;

- consent in relation to photographs and video and sound recording - fifteen (15) years after the images or sound recording have stopped being used.

7 Reporting and responding to concerning behaviour

As stated in the Policy, the protection of the safety and wellbeing of children and vulnerable adults relies on every University Member accepting responsibility to report any concerning behaviour towards them.

7.1 What to report

The responsibility to report applies to when a University Member considers that a child or vulnerable adult is at risk of being harmed including by concerning behaviour and/or child abuse and/or neglect as defined in section 2. This may come to the attention of a University Member by, for example:

- observing or witnessing behaviour towards a child or vulnerable adult; and/or
- a disclosure about behaviour or incidents by a person including by a child or vulnerable adult; and/or
- a child or vulnerable adult exhibiting signs (e.g. behaviour or appearance) which suggests they may not be receiving proper care.

7.2 Making a report

The process of making a report is represented diagrammatically in Attachment 6. The process is aligned to the ACU Critical Incident Management Policy and Procedures. Reports of concerning behaviour about a University Member or a person on an ACU site or while participating in an ACU activity should be made immediately to the following:

	Nature of concerning behaviour	Report to
(1)	Situation requires an emergency response . That is, a child or vulnerable adult is being harmed or in imminent danger of being harmed	Police - call 000 Also notify ACU National Security Centre (telephone ext 8888 or 1300 729 452) or one of the University Officers identified below in (3), providing the same information.
(2)	Child abuse and/or neglect is witnessed or suspected	The relevant state or territory child protection statutory authority . Contact details for these agencies is provided in Attachment 7. Also notify ACU National Security Office Centre (telephone ext 8888 or 1300 729 452) or one of the University Officers identified below in (3), providing the same information.
(3)	Other concerning behaviour (i.e. not specifically identified in (1) or (2)).	A University Officer in a position of authority within ACU such as: (i) the ACU person associated with the activity involving children and/or vulnerable adults. This may be the Responsible Officer for the activity (refer to section 3) or a supervisor, manager or coordinator;

		(ii) National Child Protection Manager on extension 3364, telephone 03 9953 3364.or email ChildProtection@acu.edu.au.
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7.3 Emergency response or child abuse and/or neglect (i.e. (i) or (2) above)

When a report is made to the Police or a state or territory child protection statutory authority and ACU National Security Centre or University Officer in accordance with (1) or (2) above, the matter will be handled by activating the ACU Critical Incident Management Policy. These Procedures may inform the actions of the Incident Response Group or Critical Incident Response Group established under the Critical Incident Management Policy.

7.4 Other concerning behaviour (i.e. (3) above)

Reports to University Officers under (3) above may be made **verbally or in writing**. The University Officers will **act immediately** on all reports of concerning behaviour, whether they are made formally or informally, and in accordance with sections 7.5 and 7.6 of these Procedures.

If an initial complaint of harm and/or child abuse and/or neglect is made to a University Officer under (3), the person reporting (referred to as the “reporter”) will be advised to contact the Police (1) or relevant child protection statutory authority (2). In any case, **the University Officer must refer the reported harm and/or abuse and/or neglect** to the following and the matter will then be handled by activating the ACU Critical Incident Management Policy (refer to section 7.3 above):

- **the Police and/or relevant child protection statutory authority, and**
- **ACU National Security Centre (telephone ext 8888 or 1300 729 452).**

7.5 All reports are documented

A report of concerning behaviour will be documented by:

- the reporter, if they make their report in writing; and/or
- the University Officer based on the information communicated verbally by the reporter. It is the responsibility of the University Officer to record any additional information not recorded in the reporter’s written report.

The written report of the concerning behaviour will include the following information:

- the name and contact details of the reporter;
- time, date and place of the event(s) leading to the report;
- as close as possible to ‘word for word’ account of the reporter’s description of the event(s) including the names or a description of the adult(s) and child(ren) or vulnerable adult(s) involved;
- what was said by both parties (i.e. University Officer and reporter) before and after the reporters account of the event(s);
- any actions that are taken; and
- date of report and signature.

7.6 Action following a report

7.6.1 University Officer

The University Officer will refer the report of concerning behaviour, including the written report, to:

- the Associate Vice-Chancellor or Campus Dean of the ACU site on which the concerning behaviour occurred or on which the University Officer in a position of authority is located, and
- if ACU students are involved, the Deputy Vice-Chancellor (Student, Learning and Teaching), referred to as DVC(SLT), or
- if ACU staff are involved, Director, HR.

7.6.2 Associate Vice-Chancellor or Campus Dean and DVC(SLT) or Director Human Resources

The relevant Associate Vice-Chancellor or Campus Dean **and** DVC(SLT) (student matters) or Director Human Resources (staff matters) will take immediate action to:

- if required, activate the Critical Incident Management Policy.
- ensure that children and vulnerable adults are safe and supported, through relevant managers, as appropriate. This may involve action to remove the University Member or member of the public from contact with children or relevant vulnerable adults.

The relevant Associate Vice-Chancellor or Campus Dean **or** DVC(SLT) **or** Director Human Resources will:

- initiate processes for appropriate further action to be taken by the University in response to the report, and ensure that further action is taken by the appropriate area(s) of the University;
- provide or make arrangements to provide appropriate feedback and support to the reporter; and
- ensure that the written report together with records of actions taken are handled in accordance with Accident and Incident Reporting Guidelines and that copies of all records are provided to the National Child Protection Manager.

Further action that may be taken by the University may include but is not limited to:

- in the case of harm and/or child abuse and/or neglect, reporting the matter to the Police or relevant child protection statutory authority;
- suspension or exclusion of the University Member from ACU sites or activities (e.g. on non-ACU sites) pending investigation by ACU or government agencies;
- in the case of research, revoking Human Research Ethics Committee approval;
- investigating the concern reported;
- undertaking risk assessment and implementing strategies to ensure the reported behaviour is managed and eliminated;
- if the reported behaviour occurred at a non-ACU site in the course of undertaking ACU related activities (e.g. students or staff engaged in community activities, professional experience, research, etc) and if appropriate, notifying a relevant officer within the organisation in which the behaviour occurred that a report has been made;
- invoking policies and procedures relevant to the situation (e.g. ACU Staff Enterprise Agreement, Code of Conduct for All Staff, Student Conduct and Discipline Policy and

8 Roles and Responsibilities

8.1 All University Members

Refer to the Policy.

8.2 Responsible Officers

The Responsible Officers for different categories of activities involving children and vulnerable adults are identified in section 3. The role of Responsible Officers includes:

- taking actions to ensure activities involving children and/or vulnerable adults are approved and conducted in a manner which contributes to their safety and wellbeing (refer to Attachment 2).
- in accordance with section 6, ensuring secure retention and disposal of consent forms, signed by parents and guardians, associated with activities for which they are responsible.
- fulfilling the role of a University Officer (for reporting concerning behaviour) (refer to section 8.4).

8.3 Organisational Contact Officers (for WWC/V checks)

The Organisational Contact Officers are identified in section 5.2.3 and a list of names is maintained on the [ACU Working with Children and the Vulnerable Adults Webpage](#). The responsibilities of Organisational Contact Officers are outlined in Attachment 3.

8.4 ACU National Security Centre (for reporting concerning behaviour)

If a report is received of a child or vulnerable adult being harmed or in imminent danger of being harmed or of child abuse and/or neglect, handle the matter in accordance with the ACU Critical Incident Management Policy and Procedures.

8.5 University Officers (for reporting concerning behaviour)

The University Officers who are contacts for reporting concerning behaviour are identified in section 7.2(3). The responsibilities of University Officers include:

- acting on all reports of concerning behaviour, whether they are made formally or informally.
- if a complaint is made of harm, abuse and/or neglect, advising the person reporting to contact the Police or relevant child protection statutory authority, and reporting the reported harm, abuse and/or neglect to the Police or relevant child protection statutory authority and ACU National Security Centre (telephone ext 8888 or 1300 729 452) in order to activate the ACU Critical Incident Management Policy and Procedures.
- ensuring that a report of concerning behaviour and any actions that they take is documented in accordance with section 7.5
- referring a report of concerning behaviour to the relevant Associate Vice-Chancellor or Campus Dean and DVC(SLT) (student matters) or Director Human Resources (staff matters) in accordance with section 7.6.2.

8.6 DVC(SLT), Director Human Resources, Associate Vice-Chancellors and Campus Deans

The relevant Associate Vice-Chancellor or Campus Dean or DVC(SLT) or Director Human Resources are responsible for taking immediate action following a report of concerning behaviour from a University Officer, in accordance with section 7.6.2.

The Director Human Resources is also responsible for:

- approving police checks for University Members other than students in the event that a WWC/V check is considered appropriate but the relevant state or territory government agency does not require a check to be undertaken (refer to section 5.1).
- in relation to University Members who are not students, taking immediate action following advice of the failure to obtain or notifications of suspension or removal of WWC/V clearances and disclosures regarding changes of police information in accordance with section 5.6.2 and Attachment 4.

8.7 DVC(R)

In relation to higher degree research students, the DVC(R) is responsible for taking immediate action following advice of the failure to obtain or notifications of suspension or removal of WWC/V clearances and disclosures regarding changes of police information in accordance with section 5.6.2 and Attachment 4.

8.8 Executive Dean and relevant Executive member for non-Faculty areas

The Executive Deans of Faculties and relevant Executive member for non-Faculty areas with students are responsible for:

- appointing nominees for the following purposes:
 - to act as Organisational Contact officers for the purposes of WWC/V Checks for students in accordance with section 5.2.3.
 - to be responsible for record-keeping in relation to background checks for students in accordance with section 5.7.1.
- in relation to students (excluding higher degree research students), taking immediate action following advice of the failure to obtain or notifications of suspension or removal of WWC/V clearances and disclosures regarding changes of police information in accordance with section 5.6.2 and Attachment 4.

Executive Deans are also responsible for approving police checks for students in their Faculty in the event that a WWC/V check is considered appropriate but the relevant state or territory government agency does not require a check to be undertaken (refer to section 5.1).

8.9 Members of the Executive

Members of the Executive are authorised to approve events involving children and/or vulnerable adults in the area for which they are responsible in accordance with section 3.

9 Revisions made to this Procedure

Date	Major, Minor or Editorial	Description
3 April 2019	Editorial	Updated to include reference to Australian Catholic University Staff Enterprise Agreement 2017 – 2021 and Service Central.

The University may make changes to these procedures from time to time to improve the effectiveness of its operation. In this regard, any staff member who wishes to make any comments about these procedures may forward their suggestions to Human Resources.

10 Further Assistance

Any staff member who requires assistance in understanding this policy should first consult their nominated supervisor who is responsible for the implementation and operation of these arrangements in their work area. Should further information or advice be required staff should visit [Service Central](#).

Attachment 1: Definitions

The following terms have specific meanings in these Procedures:

“**ACU Site**” refers to an ACU Campus or Satellite Centre.

“**Child / Children**” is a person or persons under the age of 18.

“**Child abuse and/or neglect**” can generally be defined as occurring when a child has been, is being, or is likely to be subjected to physical, emotional or sexual actions or inactions which have resulted in, or are likely to result in, significant harm or injury to the child. This definition is a generalisation of the definitions at law. Jurisdictionally applicable definitions can be obtained from the relevant legislation in each state and territory.

“**Concerning behaviour**” is the actions or inactions of a person that cause or are perceived to cause or could potentially cause harm (defined below) to a child or vulnerable adult.

“**Deputy Vice-Chancellor (Research)**”, “**Deputy Vice-Chancellor (Students, Learning and Teaching)**”, “**Chief Operating Officer**”, “**Director, Human Resources**”, “**Associate Vice-Chancellor**” and “**Campus Dean**” refers to the person appointed to each of these positions, including on a temporary or acting basis, or any nominee of each person.

“**Harm**” is defined as the detrimental impact on the physical, psychological, emotional or social safety, wellbeing and development of a child or vulnerable adult.

“**Organisational Contact Officer**” has the definition provided in sections 5.2.1 and 5.2.3.

“**Responsible Officer**” has the definition provided in sections 3 and 8.2.

“**University Officer**” has the definition provided in section 7.2(3).

“**University Members**” are the students, staff and affiliates of the Australian Catholic University including:

- students (i.e. a person who is enrolled in any program, unit of study or research or non-award study offered by or at the University);
- staff (i.e. academic, professional and senior staff employed on a full-time, part-time, fractional, sessional, continuing, fixed term, and casual basis)
- affiliates including:
 - religious members
 - members of affiliated institutions performing work for ACU
 - volunteers
 - contractors and consultants performing work for ACU
 - agency staff, e.g. temporary staff
 - committee members who are not ACU employees
 - honorary members
 - visiting members
 - guests of University Members.

“Vulnerable adult” refers to an adult who is experiencing disadvantage and accesses a regulated activity or service in relation to the disadvantage. “Disadvantage” refers to physical or mental disability; social or financial hardship; and difficulty communicating in English and; therefore includes but is not limited to homeless people, victims of crime, migrants, refugees and asylum seekers, and people with addictions. The “regulated activity or service” would relate to a specific service associated with the person’s disadvantage and be offered by or in conjunction with ACU and/or University Members.

“Working with Children or Vulnerable People Check” or “WWC/V Check” refers to the following in the states or territory in which ACU operates:

Blue Card System	Queensland
Working With Children Check	NSW
Working with Children Check	Victoria
Working with Vulnerable People Registration	ACT
Child-Related Employment Screening	South Australia

Attachment 2: The Role of Responsible Officers

Responsible Officers (identified in section 3 of these Procedures) are responsible for the delivery of an approved activity related to children or vulnerable adults in accordance with the Policy and these Procedures, and in a manner which contributes to their safety and wellbeing. Among the matters to consider and actions to take by the Responsible Officer in conjunction with the approval process for the different categories of activities involving to children and/or vulnerable adults (i.e. work, study, research or events) are the following:

1 Work - excluding research and events (see 3 and 4 below)

Recruitment and appointment – new appointments: For staff, ensure that recruitment or appointment proposals are approved and appropriate screening of applicants or appointees is conducted in accordance with the Recruitment and Selection Guidelines. Essentially the key requirements of a recruitment and appointment process for a staff member can apply to the engagement of the other University Members listed above. When any University member is engaged in activities involving children and/or vulnerable adults the processes below should be followed:

- identify the skills, experience and capabilities required to work with children or relevant vulnerable adults;
- conduct an assessment and validation process to ensure that the potential University Member possesses the required background and capabilities to work with children and/or vulnerable adults. The validation process should involve referee checking. Referees should be asked specific questions about the person's experience, background and suitability for working with children and/or vulnerable adults; and
- identify whether background checks are required (see below).

Regular review – existing appointments: Regularly review of the work of existing University Members to identify whether the requirements of the role have changed and there are activities that involve increased direct contact with children and/or vulnerable adults. For staff, this should be considered as part of the Performance Review and Planning Process.

Risk Planning and Management: Ensure that Risk Management Plans are developed, approved and implemented on an ongoing basis in order to minimise the risks associated with activities involving children and/or vulnerable adults. Refer to section 4 of these Procedures for further information on Risk Management Planning.

Background checks: Prior to appointment or engagement or following the review of an existing appointment / engagement, consider whether background checks are required by the relevant state or territory and ensure that they are obtained in accordance with section 5 of these Procedures.

Consent of parents or guardians: Consider whether any of the specific work activities of the University member that involve children or vulnerable adults require consent. Refer to section 6 of these Procedures for further information.

2 Study - excluding research and events (see 3 and 4 below)

Approval of course or unit: Ensure that student activities involving children or vulnerable adults (e.g. professional placement, community engagement, clinics, field trips, etc.) which are part of a course and/or unit are approved by Academic Board or Faculty / unit approval process (for minor unit changes) in accordance with the Policy and Guidelines on Course Approval, Amendment and Review (Award Courses).

Risk Planning and Management: Ensure Risk Management Plans are developed, approved and implemented for all student activities involving children or vulnerable adults. Risk Management Planning is part of the required documentation under the Policy and Guidelines on Course Approval, Amendment and Review (Award Courses). It is also required for minor amendments to units approved at a Faculty level. Further information on Risk Management Planning is provided in section 4 of these Procedures.

Background checks: Ensure that arrangements are made for background checks to be conducted if required by the relevant state or territory, or another organisation involved in the activity, and that they are obtained in accordance with section 5 of these Procedures.

Consent of parents or guardians: Consider whether any of the specific activities within the course or unit that involve children or vulnerable adults require consent. Refer to section 6 of these Procedures for further information.

3 Research

Approval: Ensure that a research proposal which involves children and/or vulnerable adults is approved by HREC before the research commences. Applicants should refer to relevant chapters of section 4 of the [National Statement on Ethical Conduct in Human Research](#) (e.g. Chapter 4.2 refers to children and young people).

Risk Planning and Management: Ensure that a Risk Management Plan is developed, approved and implemented. A Risk Management Plan is part of the research proposal submitted to HREC. Refer to section 4 of these Procedures for further information on Risk Management Planning.

Background checks: Background checks are required for researchers engaged in research involving children or, in the ACT, vulnerable adults. Ensure that background checks have been conducted. Normally the background checks will be completed prior to application and evidence is submitted as part of the application. Refer to section 5 of these Procedures for further information.

Consent of parents or guardians: Ensure that the application addresses this and provide the proposed consent documentation will be submitted with the research proposal to HREC. The assent of the children or vulnerable adults to participation in the research will also normally be required. Refer to section 6 of these Procedures for further information.

4 Events

Events may be organised by University Members on ACU sites or elsewhere, or by or for an external person or organisation on an ACU site.

4.1 Events organised by University member

Approval: Ensure that any event involving children or vulnerable adults have been approved by the relevant Member of the Executive (or nominee).

Risk Planning and Management: Ensure that a Risk Management Plan is developed, approved and implemented. The Risk Management Plan will be submitted as part of the proposal for the event. Refer to section 4 for further information on Risk Management Planning.

Background checks: Consider whether supervisors of the event require background checks based on state or territory requirements, or if requested by another organisation involved in the activity (refer to section 5).

Consent of parents or guardians: The proposal will include proposed consent documentation. Refer to section 6 for further information.

4.2 Events - organised on an ACU site by or for an external person or organisation

Approval: Associate Vice-Chancellors/Campus Deans are responsible for approving venue hire or use for events for groups of children or vulnerable adults on their respective campuses.

Risk Planning and Management: Ensure that an appropriate Risk Management Plan has been developed for any event identified as involving children and/or vulnerable adults. Refer to section 4 for further information on Risk Management Planning.

Background checks: As part of Risk Planning and Management ensure that the host organisation has arranged background checks, if required or appropriate (refer to section 5).

Consent of parents or guardians: As part of Risk Planning and Management ensure that the host organisation has arranged consent, if appropriate (refer to section 6).

Attachment 3:

Role of Organisational Contact Officers – WWC/V Checks

The Organisational Contact Officers are identified in section 5.2.3. The key responsibilities of the Organisational Contact Officers are the key contact point for matters relating to the WWC/V check and other background checks including for the following purposes:

- receiving and taking action in relation to notifications by University members of their WWC/V clearance.
- monitoring expiry dates of WWC/V clearances and taking action if a University Member's WWC/V clearance expires.
- receiving and taking action in relation to failure to obtain, suspension, removal of WWC/V clearances, and other matters which may affect WWC/V clearances.
- ensuring files and other records of background checks are maintained, in accordance with University policies in relation to record-keeping, privacy, confidentiality and disposal.

Further information in relation to the above responsibilities is provided below:

Actions relating to notification of a WWC/V clearance

Informing University Members of requirements to provide evidence WWC/V clearance

The University Member is responsible for providing the Organisational Contact Officer with evidence of their WWC/V clearances. In order to meet this responsibility, the University Member must be informed of:

- the ACU organisational area and organisational contact person to nominate when completing WWC/V check forms applicable to WWC/V checks (including change of organisation details forms for existing WWC/V clearances).
- the requirement to submit evidence of their WWC/V clearance to the Organisational Contact Officer. This applies even when the activity for which the WWC/V check is required is undertaken by a University Member within a different organisation (not ACU).

Unless other arrangements are made within a particular organisational area, the Organisational Contact Officer will be responsible for providing University Members with the above information.

Actions following receipt of evidence WWC/V clearance

Upon receipt of evidence of a WWC/V clearance from a University member, either following an application (refer to section 5.2.1) or an existing clearance (refer to section 5.2.2), the Organisational Contact Officer will ensure that:

- (i) the clearance is appropriate to the engagement of the University member in terms of the following:
 - the location of activity (e.g. the relevant state), and
 - the category of activity (e.g. for a staff member, a paid employment clearance must be used)

AND

- (ii) the WWC/V clearance is verified if verification is required by the relevant state or territory agency, and in accordance with the table below:

State / Territory	University member	Requirement for verification
NSW	<u>all</u> University Members, including students	The NSW New Working with Children Check application process is not concluded until the notification of clearance has been verified via the Office of Children’s Guardian online system
Other states or territories with an online verification system (e.g. Victoria and Queensland)	all University Members, excluding students	Wherever the facility is available, WWC/V clearance will be verified
Other states or territories with an online verification system (e.g. Victoria and Queensland)	Students (excluding those in NSW – refer above)	Nominees of the Executive Dean or relevant Executive member for non-Faculty areas have discretion to determine whether the WWC/V checks are verified.

AND

- (iii) details of the WWC/V clearance are entered into the relevant University source system (i.e. In Place, Banner and Pay Global) and integrated with the University Wide Background Checks Database (under development at the time of writing).

Monitoring expiry dates of WWC/V clearances and taking action if a University Member’s WWC/V clearance expires

Section 5.5 sets out the periods that WWC/V clearances are in place within the jurisdictions applicable to ACU and the responsibilities of University Members and ACU in ensuring that University Members involved in activities related to children (vulnerable in the ACT) have and continue to have current and valid WWC/V clearances.

The Organisational Contact Officers are responsible for:

- monitoring the expiry dates of WWC/V clearances. For example, by periodically reviewing the expiry dates of WWC/V clearances of University Members within their area of responsibility, and
- taking appropriate and immediate action if a University Member’s WWC/V clearance has expired without evidence of a new clearance being provided, when the activities of the University Member continue to require a WWC/V clearance. Appropriate action would include:
 - notifying the University Member of the expiry of their WWC/V clearance and requesting that they provide evidence of their current WWC/V clearance.
 - if the University Member advises that the WWC/V clearance has lapsed, taking action in accordance with section 5.6.2 of these Procedures.

Receiving and taking action in relation to matters which may affect WWC/V clearances

Organisational Contact Officers should be the recipients of all notifications of failure to obtain, expiry, suspension or removal of WWC/V clearances and disclosures regarding changes of University Members' police information. An Organisational Contact Officer must act immediately to refer the matter to the ACU Officer identified in section 5.6.2 when:

- the activities of a University Member require a WWC/V clearance, and
- the Organisational Contact Officer receives notifications of failure to obtain, expiry, suspension or removal of WWC/V clearances or other disclosures by a University Member.

Record-keeping, Privacy, Confidentiality and Disposal

The Organisational Contact Officers are responsible for maintaining files and other records of WWC/V checks, including ensuring that details of WWC/V clearance are entered correctly into the relevant University source system so that they flow to the University Wide Background Checks Database (under development at the time of writing).

Organisational Contact Officers also have responsibilities to protect the privacy and confidentiality of personal information contained within the documents pertaining to WWC/V checks, and for the retention and secure disposal of those documents in accordance with section 5.7 of these Procedures.

Attachment 4:

Role of DVC(R), Executive Deans / relevant Executive member for non-Faculty areas or Director Human Resources – WWC/V Checks

Failure to obtain, suspension, removal or expiry of WWC/V Clearance by Existing University Members

Upon being informed by an Organisational Contact Officer of the failure to obtain, suspension or removal of an existing University Member's WWC/V clearance, the DVC(R), Executive Deans/ relevant Executive member for non-Faculty areas or Director Human Resources will:

- (i) take action directly or through the relevant manager to remove the University Member from the activities involving children (vulnerable people in the ACT). Interim arrangements may apply during that process while the matter is considered further.
- (ii) Communicate the action with the University Member. This may be verbal in the first instance and then confirmed in writing.

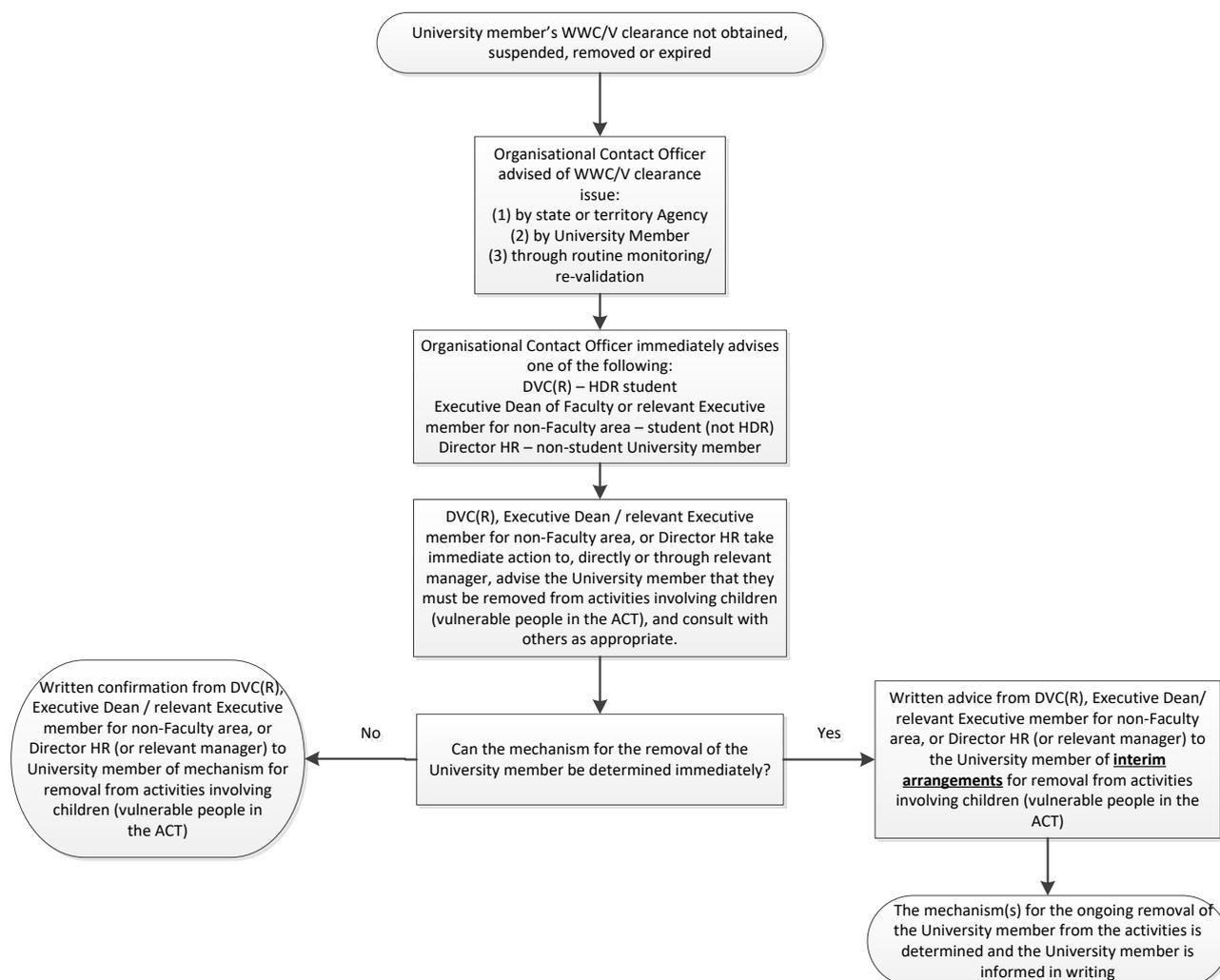
In terms of (i) above consideration will be given to the following:

- the nature of the activities being undertaken by the University Member (e.g. the extent to which the University Member is engaged in activities related to children and/or vulnerable people; whether the activities are related to work, study, research or events);
- the requirements of the relevant jurisdiction;
- in the case of the suspension of the clearance, the likely duration of the suspension (a change in clearance status could arise from a police charge and the ensuing court case may take some time, depending on the charge);
- the history of the University Member's involvement with ACU;
- ACU's commitment to the safety and wellbeing of children and vulnerable adults as well as all University Members; and
- ACU's reputation.

The objective of these considerations is not to investigate the reasons for the change to the WWC/V clearance, rather it is to determine the University's response and action. The DVC(R), Executive Deans / relevant Executive member for non-Faculty areas or Director Human Resources will consult with others as appropriate.

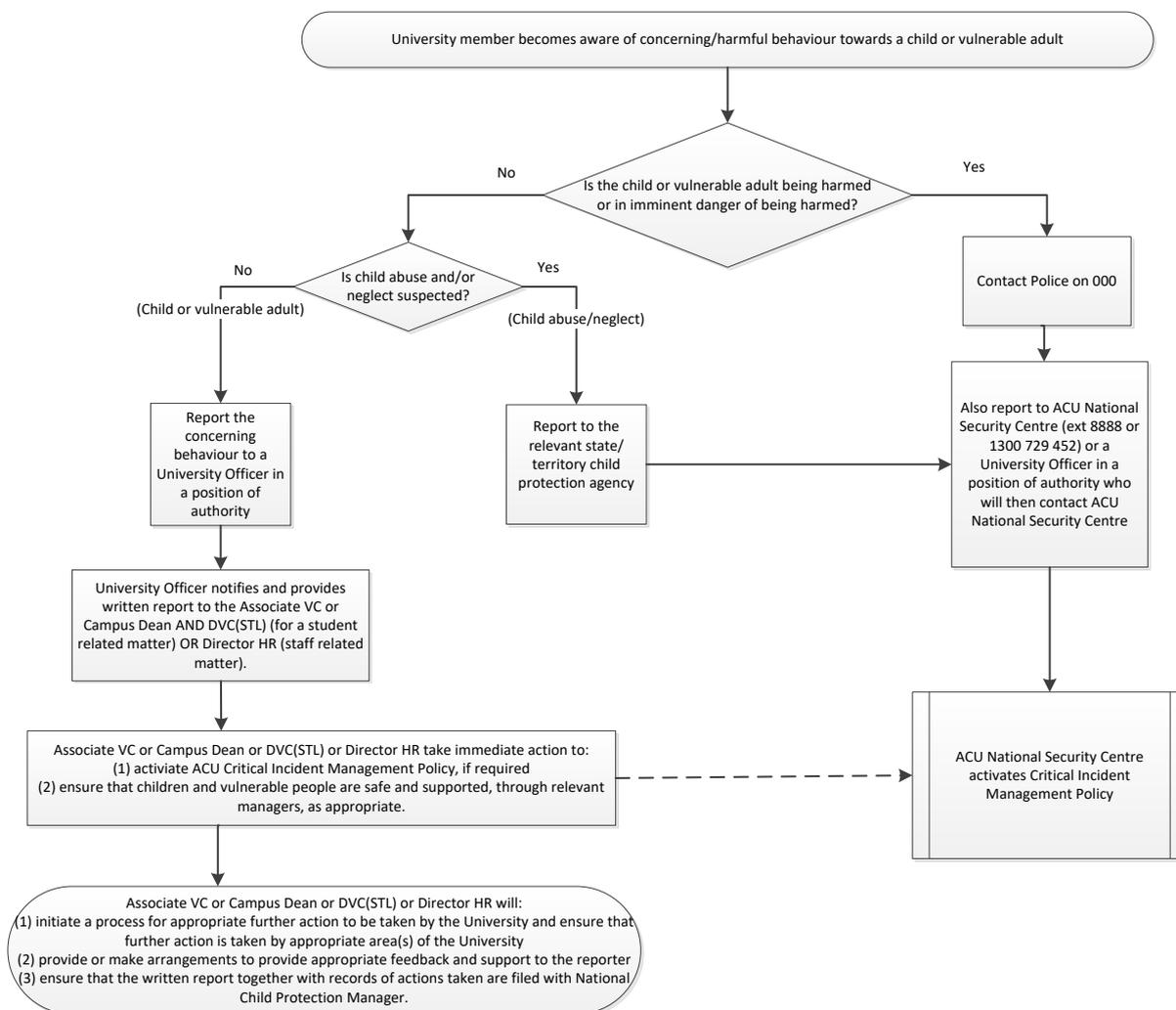
Attachment 5:

Action by ACU following notification of failure to obtain, suspension, removal or expiry of the WWC/V clearance of a University Member (refer to section 5.6.2)



Attachment 6:

Reporting and Responding to Concerning Behaviour (refer to section 7)



Attachment 7:

Child protection agencies for reporting purposes

If a child or vulnerable adult is being (or in imminent danger of being) harmed call the Police (telephone 000).

Also notify one of the University Officers identified in section 7.2 and provide the same information that has been reported to the Police or the relevant child protection statutory authority below.

State / Territory	Name of Statutory authority and website	Telephone
ACT	Carer and Protection Services, Office for Children, Youth and Family Support http://www.communityservices.act.gov.au/ocyfs/services/care_and_protection	1300 556 729 (24 hours) Mandated Persons use 1300 556 728 (24 hours)
NSW	Child Protection Helpline, Department of Family and Community Services http://www.community.nsw.gov.au/preventing_child_abuse_and_neglect/reporting_suspected_abuse_or_neglect.html	132 111 (24 hours)
Queensland	Child Safety Queensland http://www.communities.qld.gov.au/child_safety/protecting-children/reporting-child-abuse	Business hours 1300 682 254 (Brisbane) Other region - http://www.communities.qld.gov.au/child_safety/about-us/contact-us/child-safety-service-centres/regional-intake-services After hours 1800 177 135 or (07) 3235 9999. Online report form - https://secure.communities.qld.gov.au/cbir/home/ChildSafety#
Victoria	Department of Human Services – Children, Youth and Families http://www.dhs.vic.gov.au/for-individuals/children,-families-and-young-people/child-protection	Business hours 1300 664 977 (Melbourne) 1800 000 551 (Ballarat) Other region - http://www.dhs.vic.gov.au/for-individuals/children,-families-and-young-people/child-protection/child-protection-contacts After hours 13 12 78
South Australia	Families SA which is part of Department for Education and Child Development http://www.families.sa.gov.au/default.asp?navgrp=366	13 14 78 (24 hours)