



Catholic
Education
Commission
Tasmania

WORKING WITH VULNERABLE PEOPLE POLICY

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1 PURPOSE

- 1.1 The application of working with vulnerable people (WWVP) registration requirements is an integral part of CET's recruitment processes and workplace entry protocols.
- 1.2 This policy has been developed:
- (a) To prevent the engagement or entry of **Workers** who are known to be a risk to the safety, welfare and wellbeing of children.
 - (b) To establish and maintain CET as a child safe organisation within the context of the *National Principles for Child Safe Organisations* and the *Tasmanian Child and Youth Safe Organisations Framework*.
 - (c) To underpin CET's approach to meeting applicable legislative obligations.

2 WHO DOES THIS POLICY APPLY TO

- 2.1 This Policy applies to:
- (a) All CET **School Environments**.
 - (b) Any Worker who on behalf of **CET** is participating in a **Child Related Activity** or who is working at a CET School Environment.
 - (c) CET staff working in a TCEO Workplace.
- 2.2 Workers exempted from the requirements of this Policy are Workers who:
- (a) Are engaged to undertake, and only undertake, activities when Children and Young People are not present, and that are not Child Related Activities.
 - (b) Are dropping off or picking up goods for a minimal period and not engaging in a Child Related Activity or interacting with Children or Young People e.g. delivery drivers.
 - (c) Have a statutory right to enter a CET School Environment e.g. a TasWater representative.
 - (d) Are emergency management workers for the purposes of dealing with an emergency.
 - (e) Are parent volunteers assisting at a school fundraising event subject to a risk assessment which demonstrates that adequate child safety training and supervisory measures can be implemented.
 - (f) Are invited visitors e.g., a guest speaker, provided they are not being paid.

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3 STATEMENT OF COMMITMENT

3.1 CET has made the following statement of commitment to the safety and wellbeing of young people:

- (a) We are committed to the safety and wellbeing of children and young people while enabling their participation as valued members of our community.
- (b) We have zero tolerance to child abuse and harm. Our people prioritise the safety of the children they interact with in the performance of their role and must report any conduct of concern.
- (c) We recognise the important of child safety in the provision of quality education services. All children who attend Catholic Schools in Tasmania have the right to feel safe, be safe and be heard.
- (d) We recognise our legal and moral responsibilities in keeping children and young people safe and have robust policies and procedures in place to meet this commitment that are aligned with the National Principles for Child Safe Organisations and applicable Tasmanian child safety legislation.
- (e) We want children to thrive, be safe, happy, and empowered, and are dedicated to ensuring their views are listened to and respected, and they are given opportunities to contribute to how we plan and deliver our services that affect them.
- (f) We are committed to being a Child Safe Organisation.

4 POLICY PRINCIPLES

4.1 All persons shall comply with applicable legislation, this Policy and all other elements of CET's **Child Safety Program**.

4.2 All Workers engaged in a Child Related Activity or who are likely to have **More than Incidental Contact** with a **Child** or **Young Person** in a CET School Environment or who are Staff working in a TCEO Workplace must:

- (a) hold and maintain appropriate WWVP registration; and
- (b) provide CET with proof of WWVP registration:
 - (i) prior to commencing employment or an engagement with CET; and
 - (ii) as and when requested by CET.

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(c) complete the designated CET child safety training course on an annual basis.

4.3 The WWVP registration of new Staff must be confirmed during the recruitment process.

4.4 Workers who are Staff must have their WWVP registration linked to the relevant CET school or Workplace using the Department of Justice's Registration to Work with Vulnerable People webpage.

4.5 Workers who are not Staff must have their:

(a) WWVP registration status verified using the Department of Justice's Registration to Work with Vulnerable People webpage:

(i) upon initial entry into a CET school or Workplace; and

(ii) on a periodic basis thereafter.

(b) WWVP registration details recorded in CET's External Workers and Volunteers Register, to be updated on an annual basis.

4.6 Where a Worker who does not hold WWVP registration (**Unregistered Worker**) undertakes an activity which is not a Child Related Activity but which occurs in a CET School Environment where Children or Young People are present:

(a) A Staff member who holds a current WWVP registration (**Worker Supervisor**) and who has satisfactorily completed CET's online child safety training must supervise the Unregistered Worker at all times; and

(b) The Worker Supervisor must ensure the Unregistered Worker has no More than Incidental Contact with a Child or a Young Person; and

(c) The Unregistered Worker must not have undertaken such activities in a CET School Environment or Workplace on more than seven occasions in any calendar year.

4.7 A Staff member who holds a current WWVP registration and who has completed the designated CET child safety training course must provide direct supervision to:

(a) invited visitors who are likely to have More than Incidental Contact with Children or Young People.

(b) Workers who have pending WWVP registration applications when present in a CET School Environment when Children or Young People are present.

4.8 A Worker who holds a current interstate WWVP registration for a similar activity, other than a teacher or a Worker engaged to attend an overnight camp or excursion, must not be permitted to exceed 28 days of work with CET in a calendar year before obtaining the appropriate Tasmanian

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WWVP registration.

4.9 Workers who hold Volunteer WWVP registration must not commence paid employment with CET until such time that they hold Employee/Volunteer WWVP registration.

4.10 A Worker must not engage in a Child Related Activity if:

- (a) They do not hold WWVP registration.
- (b) They do not hold the WWVP registration appropriate to the terms of their engagement.
- (c) Their WWVP registration has expired.
- (d) They have been issued with a proposed negative notice or a negative notice by the Registrar; or
- (e) Their WWVP registration has been suspended or cancelled.

4.11 Where a Worker ceases to hold WWVP registration or is issued with a proposed negative notice or a negative notice, the relevant CET Workplace Manager must take all reasonable steps to ensure that the Worker ceases to engage in all CET Child Related Activities. In accordance with a Worker's terms of engagement and any relevant CECT policies and procedures, such steps may include, but are not limited to:

- (a) If practicable, modifying the Worker's work processes or duties as they relate to engagement in Child Related Activities.
- (b) Suspending the Worker's employment or engagement.
- (c) Re-deploying the Worker.
- (d) Not making an offer or further offer of employment or engagement.
- (e) Terminating the employment or engagement

4.12 Appropriate records relevant to child safety shall be created and kept in accordance with CET's records management guidelines.

5 RESPONSIBILITIES

5.1 For CET to achieve compliance with this Policy the following people must fulfill the responsibilities allocated to them under this Policy:

People who are:	Must:
Directors	1. Ensure compliance with this Policy.

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<p>CET's Child Safety Officer</p>	<ol style="list-style-type: none"> 2. Ensure the screening of Workers during recruitment. 3. Develop and ensure the adequate implementation of fit-for-purpose school / college entry WWVP registration checking processes. 4. Undertake periodic checking of the External Workers and Volunteers Register for annual unregistered Worker attendance totals. 5. Periodically assess compliance with the WWVP requirements as set out in this Policy. 6. Report all matters that could alter a Worker's WWVP registration status to the Registrar for WWVP registration in a timely manner.
<p>Workplace Managers</p>	<ol style="list-style-type: none"> 7. Ensure adequate checking of external worker and volunteer WWVP registration upon initial entry per year to a CET School Environment. 8. Ensure the External Workers and Volunteers Register is kept up-to-date. The register must record the worker's: <ol style="list-style-type: none"> i. Full name. ii. Their WWVP registration number. iii. The date and outcome of periodic WWVP registration verification (not required for workers whose WWVP registration is linked to the school). iv. The expiry date of their registration. 9. Notify the Department of Justice, using the RWVP webpage, within ten (10) working days, of a member of staff commencing or ceasing employment with CET. 10. Monitor and record unregistered Worker attendance in a CET School Environment using the External Workers and Volunteers Register.
<p>Staff</p>	<ol style="list-style-type: none"> 11. Update their WWVP registration details, using the RWVP webpage, within ten (10) days of commencing work with CET. 12. Update their details, using the RWVP webpage, when there is any change relating to their name or address within ten working days of the change occurring.

	<p>13. Be responsible for applying for, payment of prescribed fees and maintaining the appropriate type of WWVP registration.</p> <p>14. Renew their WWVP registration prior to expiry.</p> <p>15. Provide evidence of WWVP registration renewal, in accordance with the specified means, to the relevant CET payroll service.</p> <p>16. Complete designated child safety training course(s) on an annual basis.</p> <p>17. Notify the Executive Director of CET in writing, within seven (7) days of having their WWVP registration suspended or cancelled.</p>
Workers	<p>18. Comply with this Policy</p> <p>19. Provide proof of WWVP registration upon entry to a CET School Environment as required by the relevant CET Workplace.</p>

6 COMPLIANCE (LEGISLATION AND OTHER DOCUMENTS)

6.1 Applicable legislative instruments containing overarching obligations:

Tasmanian legislation

- (a) *Child and Youth Safe Organisations Act 2023.*
- (b) *Children, Young Persons and their Families Act 1997.*
- (c) *Criminal Code Act 1924*
- (d) *Registration to Work with Vulnerable People Act 2013.*
- (e) *Registration to Work with Vulnerable People Regulations 2014.*
- (f) *Teachers Registration Act 2000.*

Other

- (a) *National Principles for Child Safe Organisations.*
- (b) *Tasmanian Office of the State Archivist Notice of a disposal freeze on records relating to children*

6.2 Any failure to comply with an obligation under this Policy will likely result in disciplinary action taken under CET's Workplace Behaviour Policy and CET's Code of Conduct.

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7 DEFINED TERMS

Child Related Activity means an activity or service, including but not limited to a child education service, that relates to or involves a Child or Young Person. Where the only contact a person has with a Child or Young Person is working with a record of a Child or Young Person, that will not be considered a Child Related Activity.

Child Safety Program means CET's suite of child safety governance instruments that collectively form CET's Child Safety Program i.e.:

- (a) Child Safety Policy
- (b) Child Safety Code of Conduct
- (c) Reportable Conduct Policy
- (d) Mandatory Reporting Policy
- (e) Working with Vulnerable People Policy (this Policy)
- (f) TCEO Child Safety Committee Terms of Reference.

Contact includes:

- (a) Physical contact, which includes taking part in the Child Related Activity at the same place as a Child or Young Person; or
- (b) Face-to-face contact; or
- (c) Oral communication; or
- (d) Written communication, which includes electronic communication.

More than incidental contact includes but is not limited to activities or circumstances that allow the building of rapport with a Child or a Young Person, getting to know a Child or Young Person in any way or physical contact with a Child or Young Person.

School means any archdiocesan or religious institute school (Dominic College, St Francis Flexible Learning Centre, St Virgil's College) operating in the Archdiocese of Hobart

Staff or Staff Member means a person whose wages are paid by CET or who is engaged as a volunteer on a regular basis.

Unsupervised means a person in a CET School Environment or Workplace who does not hold WWVP registration and who is not being supervised by a Staff member

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who holds a current WWVP registration and who has satisfactorily completed CET's online child safety training.

Worker means any person who carries out work or services in any capacity for CET either as a member of staff, a volunteer, a cleric, a member of a religious institute or lay catechist, member of a religious order, a nun or a brother, a contractor, a subcontractor, an employee of a contractor, a consultant, a counsellor, a casual worker, an employee of an employment agency or labour hire company, an apprentice or trainee or an external person gaining work experience or on work placement.

For the purposes of this policy the meaning of worker does not include:

- (a) A school student on a work experience placement.
- (b) A worker under the age of 16 years.

Workplace manager means a member of staff with team leadership responsibilities e.g. a principal.

Young person means a person who has attained the age of 16 years but has not attained the age of 18 years.

Definitions for all other key terms used in this document are included in the *CET Terms and Definitions* document available on the CET Website

8 FURTHER INFORMATION AND ASSISTANCE

- 8.1 For further information and assistance in relation to this Policy please contact CET's Child Safety Officer (the TCEO's Executive Manager: People Services) T: 03 6210 8888.

9 REVIEW OF THIS POLICY

- 9.1 This Policy will be reviewed every four years.
- 9.2 Updated versions of this Policy will be available on the CET website and on request.

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