A Child Safe safety audit

ChildSafe

safe people • safe programs • safe places

REGISTERED CHARITY
acnc.gov.au/charityregister

Purpose

ChildSafe believes that care for the safety of children is an indispensable part of the work of an organisation working with Children. Typically this is why your organisation is evaluating a safety audit, to determine how your policies, procedures, and essentially your practices, compare with the National Principles (derived from the Royal Commission into Institutional Responses to Child Sexual Abuse, Standards, 2017). These Principles now set the benchmark for organisations working with children and young people across Australia, and are described below.

Safety audits are seeking to support your organisation's overall purpose by identifying opportunities for improvements. Such safety audits are meant to be independent exercises built on audit industry factors that include.

- **Impact-oriented**: audit work is focused on an established risk culture model that predicts outcomes and identifies root causes, providing the necessary foundation for action to drive genuine improvement.
- **Sustainable:** the process must be managed with integrity, be cognisant of risks (to all parties) and ensure conclusions are reliable.
- **Evidence-based:** all conclusions must be underpinned by reliable, relevant and useful information including qualitative and quantitative data sources.
- **Objective:** the methodology should employ techniques that minimise bias, both conscious and unconscious.
- **Insightful**: conclusions should seek to highlight and provide evidence on issues that have been difficult to see, understand or act on in the past.

Derived from, Auditing Risk Culture: A practical guide, IIAA, p15, 2021

Effective prevention is predicated on creating a positive, open and inclusive organisational culture in which the safety of children is paramount. This culture should be led by senior management and wholeheartedly endorsed and owned by staff at all levels.

Risk profiles for institutional child sexual abuse: A literature review. Professor Keith Kaufman and Marcus Erooga, p11, 2016

The National Principles

The National Principles for Child Safe Organisations have been endorsed by members of COAG, including the Prime Minister and state and territory First Ministers, as at February 2019. The principles aim to provide a nationally consistent approach to creating organisational cultures that foster child safety and wellbeing.

The National Principles reflect ten child safe standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse, and are the vehicle for giving effect to recommendations relating to the standards. The National Principles have a broader scope that goes beyond child sexual abuse to cover other forms of potential harm to children and young people.

These Principles are being adopted per State, at a schedule to be determined per State., with some already there. Accordingly, these principles provide a common standard and best practice for organisations working with children, and are used for safety auditing purposes. Of course, all child-related regulations that exist per State, remain an additional focus and obligation for organisations. Screening and reporting are two of the most prominent regulations here, but not exclusive ones. General State advice for screening and reporting can be reviewed at these two Federal sites:

https://aifs.gov.au/cfca/publications/pre-employment-screening-working-children-checks-and-police-checks
https://aifs.gov.au/cfca/publications/cfca-resource-sheet/reporting-child-abuse-and-neglect

The National Principles

1. **Child safety and wellbeing is embedded in organisational leadership, governance and culture.**

   1.1 The organisation makes a public commitment to child safety.

   1.2 A child safe culture is championed and modelled at all levels of the organisation from the top down and the bottom up.

   1.3 Governance arrangements facilitate implementation of the child safety and wellbeing policy at all levels.

   1.4 A Code of Conduct provides guidelines for staff and volunteers on expected behavioural standards and responsibilities.

   1.5 Risk management strategies focus on preventing, identifying and mitigating risks to children and young people.

   1.6 Staff and volunteers understand their obligations on information sharing and recordkeeping.

2. **Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.**

   2.1 Children and young people are informed about all of their rights, including to safety, information, and participation.

   2.2 The importance of friendships is recognised and support from peers is encouraged, to help children and young people feel safe and be less isolated.

   2.3 Where relevant to the setting or context, children may be offered access to sexual abuse prevention programs and to relevant related information in an age-appropriate way.

   2.4 Staff and volunteers are attuned to signs of harm and facilitate child-friendly ways for children to express their views, participate in decision-making and raise their concerns.

3. **Families and communities are informed and involved in promoting child safety and wellbeing.**

   3.1 Families participate in decisions affecting their child.

   3.2 The organisation engages and openly communicates with families and the community about its child safe approach and relevant information is accessible.

   3.3 Families and communities have a say in the development and review of the organisation's policies and practices.

   3.4 Families, carers and the community are informed about the organisation's operations and governance.

4. **Equity is upheld and diverse needs respected in policy and practice.**

   4.1 The organisation, including staff and volunteers, understands children and young people's diverse circumstances, and provides support and responds to those who are vulnerable.

   4.2 Children and young people have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.

   4.3 The organisation pays particular attention to the needs of Aboriginal and Torres Strait Islander children, children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people.

5. **People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.**

    5.1 Recruitment, including advertising, referee checks and staff and volunteer pre-employment screening, emphasise child safety and wellbeing.

    5.2 Relevant staff and volunteers have current working with children checks or equivalent background checks.

    5.3 All staff and volunteers receive an appropriate induction and are aware of their responsibilities to children and young people, including record keeping, information sharing and reporting obligations.

    5.4 Ongoing supervision and people management is focused on child safety and wellbeing.

6. **Processes to respond to complaints and concerns are child focused.**

    6.1 The organisation has an accessible, child focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report.

    6.2 Effective complaint handling processes are understood by children and young people, families, staff and volunteers, and are culturally safe.

    6.3 Complaints are taken seriously, and responded to promptly and thoroughly.

    6.4 The organisation has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and co-operates with law enforcement.

    6.5 Reporting, privacy and employment law obligations are met.

7. **Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.**

    7.1 Staff and volunteers are trained and supported to effectively implement the organisation's child safety and wellbeing policy.

    7.2 Staff and volunteers receive training and information to recognise indicators of child harm including harm caused by other children and young people.

    7.3 Staff and volunteers receive training and information to respond effectively to issues of child safety and wellbeing and support colleagues who disclose harm.

    7.4 Staff and volunteers receive training and information on how to build culturally safe environments for children and young people.

8. **Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.**

    8.1 Staff and volunteers identify and mitigate risks in the online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities.

    8.2 The online environment is used in accordance with the organisation's Code of Conduct and child safety and wellbeing policy and practices.

    8.3 Risk management plans consider risks posed by organisational settings, activities, and the physical environment.

    8.4 Organisations that contract facilities and services from third parties have procurement policies that ensure the safety of children and young people.

9. **Implementation of the national child safe principles is regularly reviewed and improved.**

    9.1 The organisation regularly reviews, evaluates and improves child safe practices.

    9.2 Complaints, concerns and safety incidents are analysed to identify causes and systemic failures so as to inform continuous improvement.

    9.3 The organisation reports on the findings of relevant reviews to staff and volunteers, community and families and children and young people.

10. **Policies and procedures document how the organisation is safe for children and young people.**

    10.1 Policies and procedures address all national child safe principles.

    10.2 Policies and procedures are documented and easy to understand.

    10.3 Best practice models and stakeholder consultation informs the development of policies and procedures.

    10.4 Leaders champion and model compliance with policies and procedures.

    10.5 Staff and volunteers understand and implement policies and procedures.

Assessment Criteria

The basis of the audit is the ChildSafe Standards based on the National Principles. These have been utilised and applied for audit since 2018, initially based on the Royal Commission into Institutional Responses to Child Sexual Abuse Standards (2017). ChildSafe have added some additional indicators reflecting ChildSafe's long-standing holistic approach to children's well-being, that extends well beyond child sexual abuse. These additional indicators would only be applied with permission and agreement, and typically with organisations that subscribe to ChildSafe, and utilise the ChildSafe framework.

Your organisation is asked to provide all applicable policies, procedures and support auditors questions around policy and practice, in accordance with the *scope and method* section below.

The organisation is then assessed against the ChildSafe Standards using the indicators shown in the standards. This detailed audit analysis is consolidated and provided in the Audit Summary Assessment tables together with summary conclusions.

It is the organisation's responsibility to provide evidence that the standards are being met. Where no evidence is given to the audit about an indicator, the lack of evidence is noted accordingly in the Summary Assessment. If a policy or procedure isn't in place, it can't be implemented, although evidence of good practice can still be noted accordingly. No assumptions can be made, in lieu of no evidence provided.

Assessment Tables

An assessment will be made of the organisation's performance on a four-point scale against each of the criteria in the ChildSafe Standards.

Column A shows the extent to which the criteria are in place: **A: In Place,** *and*

Column B shows the extent to which the criteria are implemented **B: Implemented**.

The scale is shown below.

In Place		Implemented	
3 ✓	In place	3 ✓	Implemented
2 ✓	In place but could be improved	2 ✓	Implementation could be improved
1 ✗	In place but not adequate	1 ✗	Not adequately implemented
0 ✗	Not in place or evidence not supplied	0 ✗	Not implemented

Example report table excerpt.

Standard 2 *(sample only)*

Children and young people are informed about their rights, participate in decisions affecting them

Standard	Indicator	A	B	Comment
a) Children are able to express their views and are provided opportunities to participate in decisions that affect their lives	1.1. rules of behaviour are negotiated with participants	✓	✓	Rules of behaviour are negotiated with participants.
	1.2. opportunities are provided to choose activities to participate in	✓	✓	Some opportunities are provided for participants to choose activities to participate in, but could be more clearly expressed or communicated.
	1.3. participants can opt out of activities that make them feel unsafe	✓	✓	Participants are able to opt out of activities that make them feel unsafe.
	1.4. there is an evaluation process which obtains feedback from participants about how they experienced the program	✗	✗	There is no evaluation process that obtains feedback from participants about how they experienced the program. Families are occasionally surveyed, but the response rate is moderate to poor. Mechanisms for surveying children and recording their responses should be considered.

Scope and Method

The audit is an external audit conducted by selected ChildSafe auditors. The scope of the audit is shown by what happens and what does not happen as indicated below.

What *happens*:

a. Initial discussion of audit plan with customer audit manager, including locations and schedule

b. **Desktop audit**: call on, supply of, and review of relevant organisation safety documentation to establish and review what policies and procedures are in place.

c. **Implementation audit**: personal contact via scheduled audit plan, clearly quantified for location, times and people. establishes if policies and procedures are being implemented against the standards (may include video meetings under certain health or geographical reach conditions)

d. Visiting head office to conduct interviews with senior officers

e. Visiting program location(s)

f. Interview of participant(s)

g. Interview of team member(s)

h. Assessment of the organisation against ChildSafe Standards using indicators shown in the standards

i. Reporting on the outcomes of the audit

What does *not happen*:

a. Interview parent(s) of participants

b. Analysis of evaluation responses

c. Analysis of data provided by the organisation

d. Interviews with staff, volunteers and participants; for a desktop audit

Method

The organisation should provide documents for review and facilitate the site visits necessary to achieve as a representative sample of the organisation's activities and operations. The interviews with staff and volunteers are conducted face to face where possible (see, *what happens-c* above), and some children, the latter only by approved arrangement with supervision, and where possible.

Assessments are based on review of the documentation, interviews of people at different levels within the organisation, and first-hand auditor assessments of operations. Criteria are checked against the National Standard benchmarks, to highlight what is happening now, and identify gaps, to guide the purpose of improvement for future development of the safety system, that support the well-being of children.

Deliverables

Following the completion of your requested audit, your organisation will receive a comprehensive ChildSafe audit report that will generally include the following:

- An executive summary
- Summary of findings
- Recommendations arising from audit observations, for your organisation to improve implementation in identified area
- Summary of interviews.
- Detailed Assessment Tables as a detailed multi-indicator assessment against each of the criteria in the ChildSafe Standards (see assessment table image above).
- Outline of method and scope of the report.
- Assessment criteria and limitations.
- Summary of documented child safety management data

Limitations and Findings

The findings of the audit are based on the documentation provided and site visits / interviews. It is possible that the organisation meets some of the criteria shown in an audit as, *not met* or *with room for improvement*, but the information/evidence demonstrating this simply wasn't provided to the auditor. It is also possible that there are problems in the culture, or organisation of child safety is not revealed by discussions with the sample people interviewed. Either way these are likely to be addressed if the organisation continues its commitment to child safety including implementing the recommendations made by the audit.

In the limited time available for the site visits / interviews, it is not possible to test the accuracy of <u>all responses</u> to interview questions. It is assumed that people are doing the things that they say they are doing, unless clear objective evidence exists to the contrary.

ChildSafe recommend an organisation can further detail evidences of any limited audit findings, as an appendix to an audit for their own internal record. The audit will <u>not</u> be re-visited to this effect, by subsequent discussion, though a post audit discussion is provided for, before the final audit report is presented.

Findings

This audit purpose is to make recommendations designed to enhance an organisation's ability to keep the children in its care, safe from harm. These recommendations are also made in the context of acknowledging the good work already done to achieve a safe environment for children. Any noted deficiencies should not be solely viewed as poor practice, but an opportunity for genuine improvement and care.

Even organisations which are handling child safety and care well need to be vigilant and strive for continuous improvement. Where serious incidents are typically rare, vigilance and identification of poor practice can lapse. This can occur to the point some organisations and their workers, become cynical about parts or the entire safety process. This requires that managers continually monitor and endorse protection policies to stress the importance of vigilance, to avoid such a

drift into failure

Ref. Hear no evil, see no evil, RC Report, Prof. Eileen Munro and Dr Sheila Fish, p6, 2015