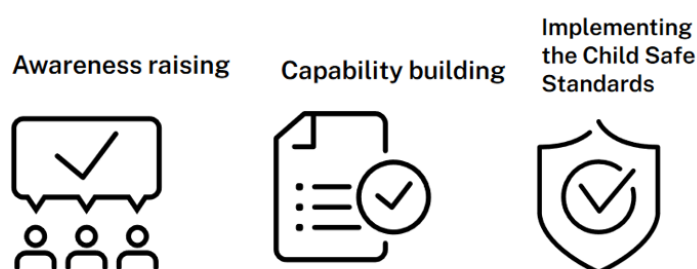


# Child Safe Action Plan – approved by the OCG on 25 October 2023

## Purpose and objectives

The NSW Education Standards Authority (NESA) [Child Safe Action Plan \(CSAP\)](#) outlines the actions we will undertake to promote and support the safety of children. As a prescribed agency under the *Children’s Guardian Act 2019* (CG Act), NESA has a legislative requirement to develop a CSAP. Our CSAP aims to drive cultural change and influence the system to embed child safety within NESA and the NSW school sectors.



## Scope

Our 4-year plan (2023-2027) includes strategies that NESA will take within the agency and with external stakeholders, including related bodies to:

1. Build awareness about the importance of child safety,
2. Build the capability of child safe organisations to implement the Child Safe Standards, and
3. Improve the safety of children by implementing the Child Safe Standards.

A *related body* means a child safe organisation (as specified under section 8H the CG Act) that the NESA funds or regulates, namely the NSW school sectors<sup>1</sup>.

## Child Safety: Functions and role of NESA

As an independent statutory regulator, NESA performs a variety of functions as outlined in the *NESA Act 2013*:

- i. The school curriculum for primary and secondary school children,
- ii. The approval of initial and continuing teacher education courses and programs relevant to the accreditation of persons under the *Teacher Accreditation Act 2004*,
- iii. The accreditation of teachers and the monitoring of the accreditation process across all schools and early childhood centres under the *Teacher Accreditation Act 2004*,
- iv. Basic skills testing,
- v. The granting of Records of School Achievement and Higher School Certificates,
- vi. The registration and accreditation of schools,
- vii. The approval of providers of courses at schools to overseas students,

<sup>1</sup> NSW school sectors refers to the Department of Education, Independent Schools, and Catholic Schools NSW

- viii. The development, content and application of professional teaching standards, and
- ix. Reporting and advising on matters relating to the Authority's functions.

In addition, NESA's staff may interact with children in the following contexts:

- i. The examination and/or supervision of Higher School Certificate (HSC) and Australian Music Examinations Board (AMEB) exams
- ii. The regulation of schools, schooling systems, teachers, home schooling parents, and professional development providers
- iii. Engagement with students online, for example, through surveys and StudentsOnline
- iv. Storage of sensitive information relating to children.

## Role of the Office of the Children's Guardian (OCG)

The OCG is leading the implementation of the [Child Safe Scheme](#) (the Scheme) in child-related organisations across NSW. The Scheme aims to drive cultural change by raising awareness, building capability, and holding organisations to account for their implementation of the Child Safe Standards, recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse.

The OCG has regulatory oversight of the Scheme and monitors, investigates, and may enforce implementation of the Standards.

The *CG Act* requires that NESA, as regulator, develop strategies to increase community awareness regarding the importance of child safety, and to build the capability of schools to implement the Child Safe Standards.

## Development

### Consultation

The CSAP has been developed through an in-depth internal and external consultation process, including:

- Consultation across NESA's four divisions to identify key risk areas, pre-existing initiatives and/or gaps in the draft plan.
- Developing a range of draft actions to address child-related areas across NESA and mapping the Child Safe Standards against these actions.
- Engaging with team leads across NESA to identify responsible owner(s) for each action, agree upon measures, timelines, and expected outcomes.
- Consultation with the Office of the Children's Guardian (OCG) and submitting draft plans for feedback to ensure its compliance with the *CG Act*.
- Consultation with the Department of Education on the development of their plan, with approved plans to be exchanged and further consultation.

### Implementation

The CSAP's implementation will be an ongoing process which aims to drive continuous improvement.

Our CSAP implements a range of protective strategies to raise awareness, build capability and embed the [Child Safe Standards](#) into our:

- Code of Ethics and Conduct

- Internal and external communication and engagement strategy
- Risk Management Framework
- Policies and procedures for schools and teachers
- Training for staff NESAs-wide, including specialised training for staff who interact directly with children
- Onboarding and recruitment, including working with children checks, and
- Safeguarding child-related data, including reviews of our Record and Information Policy and Privacy Management Plan.

## Implementation governance



- The Implementation Working Group will oversee the progress and delivery of CSAP actions
  - Membership will represent a variety of directorates across NESAs with specialised knowledge and relevant expertise
  - This will enable collaboration and visibility across NESAs of child safety
- The Working Group will meet and report quarterly to the Organisational Excellence Program Control Group who is accountable to the Executive Leadership Team.
- The Executive Leadership Team at its Quarterly Portfolio Review will oversee the Plan's progress, implementation, and compliance.

## Reporting

**Annual reporting:** NESAs must link to its CSAP in its annual report and assess the effectiveness of the Plan in promoting and supporting the adoption and implementation of the Standards by related bodies (*CG Act* s 8N).

**Progress reports:** the OCG may require NESAs to provide a progress report on the Plan's implementation (*CG Act* s 8M).

Child Safe Action Plan (CSAP)

Action(s)	Responsible owner	Accountable Executive Director	Measurement(s)	Expected outcome(s)	Timeline
<p><b>1.</b> Develop a Child Safe Policy:</p> <p><b>a)</b> an organisational statement of Commitment to Child Safety</p> <p><b>b)</b> Incorporate commitment into NESA's Code of Conduct and Ethics</p> <p><b>c)</b> Informs NESA staff of their obligations and responsibilities in keeping children safe</p> <p><b>d)</b> Review Child Safe Policy annually</p>	<ul style="list-style-type: none"> <li>Executive Leadership Team (ELT)</li> <li>People Operations</li> </ul>	Strategy and Capability	See related measures in Actions 2 and 3	<p>Increased awareness of NESA's CSAP and the Child Safe Standards across the organisation and in the community</p> <p>Build the capacity of NESA to implement the Child Safe Standards</p> <p>See Actions 2 and 3</p>	6-12 months
<p><b>2.</b> Develop an internal communication and engagement plan to raise awareness of the Child Safe Standards and the CSAP among NESA staff</p>	People Operations (intranet)	Strategy and Capability	Number of staff visits to intranet page(s) relating to the Child Safe Standards/the CSAP	Build awareness about the importance of child safety among NESA staff.	6-12 months
<p><b>3.</b> Develop an external communication and engagement plan to:</p> <p><b>a)</b> expand awareness of and responsibility for child safety with our external stakeholders, specifically NSW school sectors</p> <p><b>b)</b> enable the NSW school sectors to embed Child Safe Standards to ensure that child</p>	Communications and Engagement with input from School and Teaching Standards Division	Strategy and Capability	<ul style="list-style-type: none"> <li>Number of unique visits to NESA's CSAP webpage</li> <li>Number of downloads of child safe resources from NESA's website (if made available)</li> <li>Record of number of communication and engagement channels NESA uses to</li> </ul>	Build awareness in the community about the importance of child safety in child safe organisations.	12-18 months

Action(s)	Responsible owner	Accountable Executive Director	Measurement(s)	Expected outcome(s)	Timeline
<p>safety systems, policies and processes are in place</p> <p><b>c)</b> promote the Child Safe Standards through relevant communication and engagement channels</p> <p><b>d)</b> promote NESA's organisational commitment to child safety and the CSAP on public-facing website, including the use of child-friendly resources</p> <p><b>e)</b> communicate NESA's commitment to Child Safety and relevant OCG resources to NESA's key stakeholders via existing channels of communication</p>			<p>communicate with stakeholders about child safe standards</p>		
<p><b>4.</b> Review school and teaching related policies and processes:</p> <p><b>(a)</b> Review manuals and resources provided to schools, exploring opportunities to include additional Child Safety resources</p> <p><b>(b)</b> Explore options for accrediting Child Safe training programs developed by the OCG</p>	<ul style="list-style-type: none"> <li>• Teacher Education and Accreditation</li> <li>• Regulation of Schooling</li> <li>• Teacher Policy and Professional Conduct</li> </ul>	<p>School and Teaching Standards</p>	<ul style="list-style-type: none"> <li>• Publication on NESA website of child safe resources developed in consultation with NSW school sectors.</li> <li>• Engagement of OCG Child Safety training officers to provide professional learning for School Registration Officers.</li> </ul>	<p>Build awareness in the sector about the importance of child safety in child safe organisations</p>	<p>18-24 months</p>

Action(s)	Responsible owner	Accountable Executive Director	Measurement(s)	Expected outcome(s)	Timeline
<p><b>5.</b> Review/develop a risk management framework that embeds child safety and is:</p> <p><b>a)</b> focuses on identifying, preventing, and lowering risks to children</p> <p><b>b)</b> ensures that NESA's systems, policies, and processes mitigate against any recurrence of failures to keep children safe</p> <p><b>c)</b> visible and easily accessible to all NESA staff</p>	<p>Risk management framework developed for all directorates which have child-related operations, including:</p> <ul style="list-style-type: none"> <li>• Teacher Policy and Professional Conduct</li> <li>• School Registration and Accreditation</li> <li>• NAPLAN and HSC</li> </ul> <p>People Operations: publish related intranet content</p>	<p>School and Teaching Standards</p> <p>Curriculum and Assessment</p>	<ul style="list-style-type: none"> <li>• NESA staff have the knowledge and skills they need to keep children safe</li> <li>• Managers and senior leaders have increased risk management capability in relation to the Child Safe Standards</li> <li>• Number of intranet site visits/document downloads of updated risk management framework by NESA staff</li> </ul>	<p>Increase awareness about the importance of child safety among</p> <p>a) NESA staff b) NSW school sectors</p>	<p>12 months</p>
<p><b>6.</b> Onboarding, recruitment, and employee life cycle</p> <p><b>a)</b> review and harmonise working with children check (WWCC) processes and embed an annual WWCC employer compliance check</p> <p><b>b)</b> continuously monitor staff in high-risk roles, including casuals and contractors</p> <p><b>c)</b> review which roles at NESA meet the requirements for a WWCC and incorporate if necessary</p>	<p>People Operations, with input from relevant NESA divisions, including</p> <ul style="list-style-type: none"> <li>• Curriculum and Assessment</li> <li>• School and Teaching Standards</li> </ul>	<p>Strategy and Capability</p>	<ul style="list-style-type: none"> <li>• Number and percentage of staff that complete child safe training at induction</li> <li>• Number of staff accessing identified relevant existing online training resources</li> <li>• Percentage of hiring managers trained in child safe recruitment practices</li> </ul>	<p>People working with children are suitable and supported (Child Safe Standard 5)</p> <p>Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training (Child Safe Standard 7)</p> <p>Build awareness about the importance of child safety and build the capacity of NESA to implement the Child Safe Standards</p>	<p>6 – 12 months</p>

Action(s)	Responsible owner	Accountable Executive Director	Measurement(s)	Expected outcome(s)	Timeline
<p><b>d)</b> employment advertising includes NESAs Statement of Commitment to Child Safety</p> <p><b>e)</b> ensure staff receive appropriate induction and are aware of their child safety responsibilities, including reporting obligations</p> <p><b>f)</b> promote access to existing training resources, including through the OCG</p> <p><b>g)</b> emphasise the importance of child safety in recruitment, especially for identified child-related roles</p> <p><b>h)</b> train hiring managers in child safe recruitment practices</p>					
<p><b>7.</b> Child safe training for NESAs staff at induction and annually:</p> <p><b>(a)</b> General awareness raising for all staff</p> <p><b>(b)</b> In-depth training for frontline staff to build capability, including casual employees</p>	<p>6(a) People Operations</p> <p>(b) Directorates with staff who have direct or indirect contact with children (including casual employees), including:</p> <ul style="list-style-type: none"> <li>School Registration and Accreditation, including school inspectors</li> </ul>	<p>Strategy and Capability</p> <p>School and Teaching Standards</p> <p>Curriculum and Assessment</p>	<p>Number and percentage of staff that complete annual child safe training</p> <p>Number and percentage of frontline staff that complete child safe training annually</p> <p>Number of training sessions held on child safety / Child Safe Standards</p>	<p>Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training (Child Safe Standard 7)</p> <p>People working with children are suitable and supported (Child Safe Standard 5)</p> <p>Build the capability of NESAs to implement the Child Safe Standards</p>	<p>General awareness: 12 months</p> <p>In-depth training: 24 months</p>

Action(s)	Responsible owner	Accountable Executive Director	Measurement(s)	Expected outcome(s)	Timeline
	<ul style="list-style-type: none"> <li>Curriculum and Assessment, including NAPLAN, HSC, AMEB</li> </ul>				
8. Review NESA's procedures for handling teacher complaints and ensure they reflect the Child Safe Policy and the Child Safe Standards	Teacher Policy and Professional Conduct (TPPC) School Registration and Accreditation	School and Teaching Standards	Complaints resolved appropriately in a timely manner	NESA's policies and procedures about teacher complaints align with the Child Safe Policy	12-24 months
9. Ensure confidential information about children is protected <b>(a)</b> Ensure our data governance is fit for purpose and considers child safety <b>(b)</b> Review NESA's records and information policy and update our business classification system to ensure it is reflective of the Child Safe Standards <b>(c)</b> Review NESA's Privacy Management Plan	8(a) S&C- Executive Director's office, with input from relevant divisions, including: <ul style="list-style-type: none"> <li>Curriculum and Assessment student data collection</li> </ul> (b), (c) Finance & Governance	Strategy and Capability	Zero breachers or infringements on quality control  Records management audits to determine rate of correct classification	Reduce risk to child safety by ensuring that access to child-sensitive data is restricted and monitored  Increase staff awareness of the importance of child safety	12-24 months