



**AASW**  
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**Australian Association  
of Social Workers**

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*Submission to the Royal Commission into  
Institutional Responses to Child Sexual  
Abuse*

*Issues Paper 1: Working with Children  
Check*

**Submission – Aug 2013**

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## Introduction

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The Australian Association of Social Workers (AASW) is the key professional body representing more than 7000 social workers throughout Australia. Social work is the profession committed to the pursuit of social justice, to the enhancement of the quality of life, and to the development of the full potential of each individual, group and community in society.

Concern for the wellbeing of children and young people has been a core element of social work practice internationally since the development of social work as a distinct profession. Significant numbers of social workers work in the child wellbeing and protection field in a range of roles including direct case work, management and policy. No other professional discipline is so immersed in the areas of knowledge that are essential for quality relationship-based child welfare practice. As a result, social workers are recognised throughout the world as the core professional group in child protection policy, management and practice.

We are therefore pleased to provide the following submission to the Royal Commission into Institutional Responses to Child Sexual Abuse in response to **Issues Paper 1: Working with Children Check**.

## Responses

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### 1. Should there be a national Working with Children Check (WWCC)?

1.1. Yes. The AASW supports the development of a **national WWCC** that is legislated and administered at the federal level. The AASW believes a national check will:

- ensure consistency in the depth and breadth of backgrounds checks for people who work in child-related fields
- improve and facilitate the transfer of relevant information across State and Territory boundaries for the duration of the WWCC
- allow staff and volunteers to work across jurisdictions
- underscore a national commitment to the safety of Australian children in our institutions

1.2. The AASW acknowledges that screening is a critical component of preventing child maltreatment in institutional settings insofar as it makes it difficult for unfit persons to have access to children. However, current research shows that there is no reliable 'profile' of a perpetrator of child sexual abuse or any maltreatment type and that 'the majority of perpetrators detected do not have prior convictions for any form of child maltreatment' (National Child Protection Clearinghouse 2006). Therefore screening alone is insufficient. Rather the AASW proposes a WWCC *system* that also addresses the **management of situational risk**.

1.3. The AASW recommends that a WWCC system should address **three key areas**. These are: administrative functions (ensuring adoption of the latest screening and other personnel practices); physical environments (to reduce opportunities for situational maltreatment); and organisational culture (creating a child-focused environment of respect)' (National Child Protection Clearinghouse 2006).

1.4. Accordingly, the AASW endorses the essential elements of a WWCC system identified by the National Operators Forum (FaHCSIA 2010). These are:

- **Effective screening** that is 'robust, efficient...reliable [screening] based on a sound and defensible decision making frame'.
- **Robust risk management obligations** at the institutional level to:
  - 'ensure that relevant people have undergone the appropriate screening and received approval
  - assess the institutions environment and activities in relation to risks to children and reduce any opportunity for exposure to abuse
  - develop a risk management strategy to address those risks'.
- **Ongoing criminal history monitoring, compliance and reporting**. This means that once a WWCC has been issued, there should be processes 'in place to detect if there is any change in their criminal history, and for appropriate action to be taken with regard to these changes' (FaHCSIA 2010, p. 8).

1.6. The implementation of such a WWCC system would require commensurate **investment to support these initiatives at the community level**. The AASW suggests that funding, training and operational guidance is provided by the National Children's Commissioner.

## 2. What features should be included in any national scheme?

The AASW believes the key features of a national scheme should include:

- 2.1 Processes for ensuring the timely and comprehensive **sharing of relevant information** across jurisdictions for the purposes of conducting initial background checks and monitoring changes in eligibility
- 2.2 **Consistency** in the scope and type of information considered relevant to making a determination regarding eligibility for a WWCC
- 2.3 A comprehensive and transparent **decision-making framework** to ensure determinations regarding eligibility is consistent and fair. Such a framework should consider in detail the kinds of information that is relevant to making a determination and should outline special considerations, such as the challenges faced by Aboriginal and Torres Strait Islander communities.
- 2.4 **An appeals process** underpinned by the principles of natural justice
- 2.5 **Specific responsibilities for employers** including:
  - ensuring that all staff in child-related work have a valid WWCC
  - the requirement that disciplinary or conduct proceedings relevant to an individual's fitness to work with children be reported to the relevant screening body within 21 days
- 2.6 **Specific responsibilities for individuals** including:
  - Payment of fees associated with acquiring and maintaining a WWCC
  - Informing the relevant screening agency of a change of employment within 21 days for the duration of the WWCC validity
  - Informing the relevant screening agency of any incidents or issues that may be relevant to an individual's eligibility for a WWCC
- 2.7 Recognition of some of the **unique challenges for Aboriginal and Torres Strait Islander communities**, particularly those based in regional, rural and remote locations. These are outlined in detail in point 11.3 below.

## 3. If there is no national scheme, should there be minimum requirements for each state and territory scheme?

In the absence of a national scheme, the AASW endorses a **nationally consistent approach** to Working with Children Checks as reflected in the *National Framework for Protecting Australia's Children 2009-2020* (FaHCSIA 2008) and the *National Framework for Creating Safe Environments for Children* (Community and Disability Services Ministers' Conference 2005).

The key features of a nationally consistent approach are:

- Efficient, consistent and timely cross-jurisdictional sharing of information relevant to the assessment of an individual for a WWCC and for the duration of the validity of the check
- Consistency in the scope and type of information taken into account
- Consistency in the decision making framework utilised in each jurisdiction
- Ongoing criminal history checking, compliance checking and reporting to ensure that matters relevant to an individual's fitness to practise or have contact with children is monitored for the duration of the validity of the WWCC and shared across jurisdictions.

#### 4. How long should any clearance be granted for?

The period for which clearance should be granted is contingent on the measures in place to monitor changes in an individual's status including efficient and effective processes for identifying and notifying relevant person(s) of charges, convictions or disciplinary proceedings relating to inappropriate conduct with children once a WWCC has been issued. Assuming such processes are in place, are consistent across all jurisdictions (in the case of a state-based scheme) and are regularly updated and maintained, the AASW recommends a WWCC be issued for a period of **3 years**.

#### 5. Should a person be able to commence work before the check is completed?

The AASW recommends that an individual should **not be allowed any contact with children** until such time as a WWCC has been issued.

The AASW understands that WWCC processing times currently vary considerably and range from weeks to several months. In order for our recommendation to be feasible for individuals and employers the processing of WWCC applications will need to be streamlined. The AASW believes that a centralised and adequately legislated, resourced and funded national scheme provides the best possible mechanism for ensuring efficient processing of WWCC applications.

#### 6. How should child-related work be defined?

**6.1** The AASW recommends that child-related work is defined as **any work (paid or unpaid) that involves or is likely to involve, contact with children aged under 18 years**. 'Contact' should be defined broadly to include both face-to-face and regular online and telephone contact.

**6.2** The AASW believes that the expansion of 'contact' to **include interactions with children in a virtual environment** will become increasingly important and reflects:

- the prevalence of children who engage in online environments. The National Association for the Prevention of Child Abuse Neglect (2012) reports that 93% of children and teenagers use the internet, with 83% utilising social networking sites.
- current research on the importance of online safety and the use of online communications for the purposes of grooming, predation and bullying. The Australian Institute of Family Studies (2012a), for example, reporting on findings by Queensland Police and the Australian Communication and Media Authority states that:

*'the Internet provides access to vast amounts of information and the opportunity for children to meet and communicate with people from around the world. However, there are also risks for children, such as cyber bullying, stalking, or exposure to illicit materials. Criminal offenders have proved to be highly skilled at exploiting new modes of communication to gain access to children.'*

- the growing number of child related sectors that engage children in on-line environments, such as on-line or telephone counselling, on-line learning and social media. Examples include:
  - Kids Helpline (2013) which provides web, email and phone counselling to over 6000 children and young people between the ages of 5 and 25 each week.
  - Learning OnLine (Department of Education and Early Childhood Development 2013), which provides support to the on-line delivery of educational programs in Victoria. The initiative acknowledges that:

*‘Technological change in education means we are facing the largest transformation in how our students receive, interact with and respond to the learning experience that the teaching profession has ever seen. These changes mean that schools and early childhood settings are now broader than the walls of a classroom. Teachers, students and parents are increasingly using digital technologies to teach, learn and communicate, challenging the traditional concept of a school.’*

- the fact that many organisations that deliver services to children have Facebook pages and Twitter accounts.

## 7. How should child-related sectors and roles be defined?

**7.1** The AASW recommends that **child-related sectors** should be defined in very broad terms to include any institutional setting, as defined in the Letters Patent of the Royal Commission (Royal Commission into Institutional Child Sexual Abuse 2012). This will include employees and volunteers in the following settings:

- Child protection services
- Child care services
- Children’s services
- Educational institutions including pre-school
- Students who have to undertake a placement in a child-related setting
- Community health and welfare services
- Remand centres
- Youth residential centres
- Youth justice settings
- Refuges or other residential facilities used by children
- Paediatric wards of public and private hospitals
- Clubs, associations or movements (incorporated or not) including those of a recreational, sporting or cultural nature that provide services or conduct activities with children
- Religious institutions
- Commercial babysitting or child minding services
- Foster care services
- Transportation services for children including taxi services
- Coaching or tuition of any kind
- Counselling or other support services to children
- Camps for children
- School crossing services
- Entertainment or party services
- Gym or play facilities
- Photography services that photograph children
- Talent or beauty competitions held for children
- Community detention facilities for children

**7.2** The AASW recommends that a **child-related role** should be defined as any role within a child-related setting that requires child-related work as defined in point 6.1 above.

## **8. Are current exemptions for a WWCC adequate or appropriate – in particular, should a WWCC apply to those:**

The AASW acknowledges that the implementation of child-safety systems, including the WWCC, may have unintended consequences that require careful consideration.

### **a) Living in homes of children in out-of-home care**

In relation to out-of-home-care the AASW understands the need to ensure that institutional arrangements designed to foster stability and security must and should address principles of child safety. At the same time, such arrangements should not be so cumbersome as to prevent or inhibit positive, timely and flexible care arrangements that have the capacity to promote the wellbeing and development of children.

Accordingly, the AASW recommends that people living in the homes of children in out-of-home-care should undergo a WWCC but that:

- processing times and costs must be streamlined and affordable to facilitate best possible outcomes for children in out-of-home-care settings
- the WWCC should be funded by the relevant Government department

### **b) Parent volunteers**

The AASW believes that requiring parent volunteers to obtain a WWCC will support the creation of child-safe and aware institutions. However, the requirement to do so should not be so cumbersome as to prevent, inhibit or preclude parents from undertaking such activities. Accordingly, the AASW recommends that WWCC's for parents volunteers are organised by the relevant institution and consideration given to how these can be made as cost effective as possible.

## **9. What records should be included in the check? For example, should the check include juvenile records?**

The AASW recommends that the records relevant to a WWCC are as follows:

- National Police Check for charges and convictions, including spent convictions
- A review of relevant findings from professional disciplinary bodies associated with child-related sectors and roles. This would include, for example, social workers, teachers, childcare providers, foster carers, nurses, midwives and some medical professionals.
- Employment history including any relevant disciplinary or conduct proceedings
- Information from other relevant bodies such as courts, including where a court made a formal finding of guilt in relation to an offence; convicted the applicant of an offence; accepted a plea of guilt from the applicant; or acquitted the applicant of an offence because of mental impairment (AIFS 2012b)
- Consideration of whether a person is a respondent to or subject to an application for a child protection order
- Information from police investigations into allegations of serious child related offences where charges were not laid due to the child being unable or unwilling to proceed



## 10. How should an appeal process operate?

The AASW recommends that an appeal process should:

- operate according to the principles of natural justice
- consist of a panel of appointed people to hear appeals and complaints. The panel should include a consumer representative or peer along with some key disciplines, including Justice, Social Work and Law.

## 11. What issues arise from the current regime of records that result in automatic barring of a person working with children?

**11.1** The AASW recognises some of the unique challenges for Aboriginal and Torres Strait Islander communities, particularly those based in regional, rural and remote locations in relation to securing a WWCC. The AASW is aware of many situations where this has resulted in the prevention of Aboriginal and Torres Strait Islander kin from being able to provide kinship or alternative out of home care. This can result in children being removed from country and community to be placed in regional towns, which is particularly difficult and problematic.

The AASW recognises this is a very complex issue, however it requires attention and careful consideration if the overrepresentation of Aboriginal and Torres Strait children and young people who are removed from not only their homes, but also communities because of a lack of carers is to be addressed.

The AASW recommends that engagement with Aboriginal and Torres Strait Islander services is essential to identify ways of addressing this important issue.

**11.2** Indigenous Australians have been identified as being over represented in the criminal history system, which raises the issue of “shame” for Aboriginal and Torres Strait Islander people in having to reveal this for the purposes of obtaining a WWCC. This prevents Aboriginal and Torres Strait Islanders from offering to become kinship or foster carers, and also to actively volunteer or participate in, for example, the child’s school (de Plevitz 2007, p. 63).

**11.3** The following challenges have been identified by the Queensland Commission for Children, Young People and Child Guardian (CCYPCG) in relation to Aboriginal and Torres Strait Islander people:

- *‘Remoteness / isolation – Significant disruptions may occur in mail deliveries and access to legal and other appropriate support service*
- *Establishing contact – Applicants in remote communities often cannot be reached by telephone or email, which can cause significant delays in the regulatory body being able to seek information or engage with the applicant to explain, and if necessary, assist the applicant with the submissions process. This creates challenges where there is the need to make a timely decision in relation to a child or young person.*
- *Language barriers – English is not the first language in many Indigenous communities. For example, in the Torres Strait Islands there are two major languages spoken by 50% of the population (Kala Lagaw Ya and Meriam)*
- *Literacy – Indigenous people are more at risk of literacy disadvantage than non-Indigenous people in Australia. This gap is exacerbated for Indigenous people living in rural or remote communities*
- *Cultural issues – Applicants from particular traditional owner groups may experience cultural difficulties in discussing their offending with the regulatory body of a particular*

*gender, inhibiting their ability to engage in the assessment process or support their eligibility for a blue card.*

- *Proof of identity – Identity issues are recognised as an issue in Indigenous communities with applicants often uncertain of their exact date of birth and sometimes unable to provide the necessary proof of identity documents required in the application process’ (CCYPCG, 2012).*

**11.4** A further issue relates to educating the community around which offences would preclude someone being eligible to receive a WWCC and which would not. For example, in Queensland, the CCYPCG does not preclude individuals from receiving their WWCC (Blue Card) if for example, they have a criminal history relating to drug and alcohol offences, where there has been no recent concerns. However, there is ongoing misperception around this which can then prevent eligible individuals applying for the WWCC (CCYPCG, 2012). This highlights the importance of education but also of the need for practical support for Aboriginal and Torres Strait Islander communities, particularly those based outside of regional cities.

As outlined elsewhere, the AASW believes a national Office of the Children’s Commissioner has a role in addressing the need to educate and promote child-safety and related requirements, such as WWCC requirements, to the broader community.

## 12. The adequacy of the risk assessment process.

The AASW believes more can and should be done to improve risk assessment and management processes as part of a comprehensive WWCC system as outlined in question 1 above. In relation to the WWCC specifically, the AASW recommends:

- 12.1 that regardless of whether or not a national check is adopted, the current risk assessment process must be consistent across all jurisdictions in terms of the information considered when conducting the check and the types of information that is considered relevant to making a determination regarding eligibility for a WWCC
- 12.2 that institutions and employers have appropriate knowledge and understanding of what information CRIM TRACK has and has not utilised in the provision of any recommendation regarding the suitability of an individual for employment / volunteering activities
- 12.3 that institutions have the knowledge and capacity to undertake their own risk assessments. As outlined above, the AASW believes this should be facilitated through funding, training and operational guidance provided by the National Children's Commissioner.
- 12.4 In addition, the AASW suggest the Royal Commission consider the recommendations regarding the prevention of child maltreatment in organisations put forth by the National Child Protection Clearinghouse (NCPC) (2006, pp. 12-13), which states that:

*'Research has shown that many perpetrators of child abuse are people who have taken advantage of situations, or who manipulate environments, in order to abuse children... Using the situational crime prevention model empowers organisations to create environments that are child-safe and minimise situations in which children are vulnerable.'*

*'A situational crime prevention approach is about creating safe environments rather than creating safe individuals...[and] involves opportunity-reduction through manipulation of environmental dimensions'.*

As outlined earlier this is achieved through a combination of screening (WWCC processes) as well as effective policies and procedures for responding to allegations of abuse and creating a positive organisational culture. Such a culture is fostered through training and awareness regarding grooming and inappropriate behaviour; empowering and facilitating staff and volunteers to voice their concerns; and embedding a stated commitment to upholding and recognising the rights of children into practice (NCPC 2006, p. 18).

### **13. To what degree should the WWCC minimise the need for institutions to establish clear processes for responding to inappropriate behaviour of staff in child-related positions?**

- 13.1** The AASW recommends that the issuing of a WWCC should in no way diminish the need for institutions to establish clear processes for responding to the inappropriate behaviour of staff or volunteers in child-related positions. The AASW believes that screening should not be the sole focus on child safety measures and that a comprehensive risk management strategy at the organisational level is a critical and necessary component of fostering a child-safe environment.
- 13.2** The AASW believes that screening authorities, and more specifically Children’s Commissioners in each State and Territory, should have a role in educating and supporting institutions in the development of policies, procedures and practices that effectively manage and respond to risk.
- 13.3** The AASW recommends that further research is undertaken to inform the development of such educational and practical resources to support organisations in creating a child-safe environments.

### **14. How should the effectiveness of any existing or proposed WWCC be evaluated and / or monitored?**

The AASW will not be making a detailed submission regarding the evaluation and monitoring of the WWCC at this time, however we do recommend that:

- 14.1** Before the formation of a National WWCC scheme a formal evaluation of State-based WWCC systems is undertaken.

We believe such an evaluation would need to consider:

- the current effectiveness of the WWCC as a tool to protect children in institutional settings. For example, can it be shown that incidences of institutional child sexual abuse have declined since the introduction of the WWCC?
- the costs of operating a WWCC system including an analysis of the cost effectiveness of this
- an analysis of current inefficiencies in processing WWCC applications to identify how time frames can be improved and processes streamlined
- the relative benefits and problems associated with the inclusion of various records across current state-based systems
- unintended consequences. The AASW is concerned for example that Aboriginal and Torres Strait Islander people may be deterred from employment, volunteering or kinship care opportunities if they have criminal history records of any kind
- accessibility of the WWCC system to Aboriginal and Torres Strait Islander people with consideration to limitations outlined in point 11.3 above.

The AASW recommends that the results of such an evaluation should inform the development of a National scheme.

- 14.2** The AASW recommends that any future evaluation and monitoring strategy should include a grievance process for individuals who were unsuccessful in obtaining a WWCC through the general and appeals process but who wish to pursue a complaint or grievance regarding this finding.

## 15. General Comment

- 15.1 While beyond the scope of the Issues Paper into the WWCC, the AASW would like to highlight the need to apply some of the principles outlined here to work with other vulnerable groups, such as people requiring personal care, aged care or disability support. The AASW wishes to acknowledge that many of the issues raised here have relevance to other vulnerable groups and that the principles of child-safety can and should have application beyond those outlined here. Accordingly, the AASW recommends that governments consider how the WWCC might be applied to institutions that work with vulnerable people more broadly.
- 15.2 The AASW has highlighted the important role we believe the Children's Commissioners have to play in the implementation and success of a WWCC system. We are aware that the recent Commission of Inquiry into the Child Protection System in Queensland has recommended the disbanding of the Children's Commissioner. The AASW wishes to re-state its strong objection to this proposal. The AASW believes the proposal to abolish this Commission will mean that we are out of step with national best practice and potentially in breach of our international obligations under the United Nations Convention on the Rights of the Child.

## Conclusion

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The AASW believes the nationalisation of the Working with Children Check will improve the capacity to consistently and adequately screen individuals undertaking child-related work. However current research clearly indicates that screening alone is insufficient. Child-safe institutions require attention to administrative functions (screening), physical environments (risk management obligations at the institutional level) and organisational culture (creating child-focused environments). The AASW believes these three aspects of child-safety should be addressed as part of a WWCC system with commensurate investment to support the implementation of these measures at the institutional level. The AASW suggests that funding, training and operational guidance be provided to institutions through the Office of the Children's Commissioner nationally.

The AASW acknowledges the risks and unintended consequences of any attempt to define the circumstances in which an individual should be required to obtain a WWCC, the information that should be used to make a determination regarding eligibility and when exemptions are appropriate. This submission has outlined some of these considerations based on the experience and expertise of our members, however the AASW recommends that prior to the development of a national or nationalised scheme current WWCC systems should be formally evaluated to explore in more depth the relative strengths and weaknesses, risks and opportunities of the WWCC model.

**Submitted for and on behalf of the Australian Association of Social Workers Ltd**



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**Chief Executive Officer**

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