



Catholic  
Education  
Commission  
Tasmania

# WORKING WITH VULNERABLE PEOPLE POLICY

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## 1 PURPOSE

- 1.1 The application of registration to work with vulnerable people henceforth referred to as RWVP 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.

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## 2 WHO DOES THIS POLICY APPLY TO

- 2.1 This Policy applies to:
- (a) All CET **School Environments**.
  - (b) All Workers undertaking any form of work on behalf of CET in a CET School Environment at any time.
  - (c) CET staff working in a TCEO Workplace.
- 2.2 Workers and persons exempted from the requirements of this Policy include:
- (a) A person who is engaged to undertake, and only undertake, work of an emergency repair nature and who do not have RWVP registration - provided they will not have more than incidental contact with Children or Young People and their engagement was given prior approval by the Principal and the Principal reports this engagement to the relevant Principal Lead within 24 hours.
  - (b) A person who is 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) A person who has a statutory right to enter a CET School Environment e.g. a TasWater representative.
  - (d) A person who is not providing or being paid to provide a regulated activity that has been invited to attend a TCEO Workplace provided CET staff have direct supervision of that individual e.g. a guest speaker/presenter.
  - (e) Additional situations involving parents/guardians/relatives that are not applicable:
    - (i) Dropping off or collecting children, including short periods of settling children in class where the teacher is present.
    - (ii) Attending school community events (e.g. assemblies, school sports carnivals, plays and concerts) where they are not direct participants and/or do not assist in the organisation or execution of these events.
    - (iii) Attending school public events (fair, sporting match open to the public, opening of a new building, new program/initiative launch) where on occasion a person may be a participant (e.g. media accompanying a politician launching a new school program).
    - (iv) Attending school for a parent information evening, parent/teacher interviews or to

hear a guest speaker.

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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 importance 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.

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### **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 undertaking any form of work on behalf of CET in a CET School Environment at any time or who are Staff working in a TCEO Workplace must:

- (a) hold and maintain appropriate RWVP; and
- (b) provide CET with proof of RWVP:
  - (i) prior to commencing employment or an engagement with CET; and
  - (ii) as and when requested by CET.
- (c) complete the designated CET child safety training course on an annual basis.

**4.3** The RWVP status of new Staff must be confirmed during the recruitment process.

**4.4** Workers who are Staff must have their RWVP 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) RWVP 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) RWVP details recorded in CET's External Workers and Volunteers Register, to be

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updated on an annual basis.

- 4.6** Where a Worker who does not hold a RWVP (**Unregistered Worker**) undertakes an EMERGENCY repair activity in a CET School Environment which is not a Child Related Activity irrespective of whether Children or Young People are present:
- (a) a Staff member who holds a current RWVP (**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's Supervisor must ensure the Unregistered Worker has no More than Incidental Contact with a Child or a Young Person.
- 4.7** A Staff member who holds a current RWVP 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 RWVP applications when present in a CET School Environment when Children or Young People are present.
- 4.8** A Worker who holds a current interstate RWVP 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 RWVP registration.
- 4.9** Workers who hold Volunteer RWVP must not commence paid employment with CET until such time that they hold an Employee RWVP.
- 4.10** A Worker must not engage in a Child Related Activity if:
- (a) They do not hold RWVP.
  - (b) They do not hold the RWVP appropriate to the terms of their engagement.
  - (c) Their RWVP has expired.
  - (d) They have been issued with a proposed negative notice or a negative notice by the Registrar; or
  - (e) Their RWVP has been suspended or cancelled.
- 4.11** Where a Worker ceases to hold RWVP 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 CET 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 Worker's employment or engagement
- 4.12** Appropriate records relevant to child safety shall be created and kept in accordance with CET's records management guidelines.

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## 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:

<b>People who are:</b>	<b>Must:</b>
<b>Directors</b>	(a) Ensure compliance with this Policy.
<b>CET's Child Safety Officer</b>	(a) Ensure the screening of Workers for RWVP during recruitment. (b) Develop and ensure the adequate implementation of fit-for-purpose school / college entry RWVP checking processes. (c) Ensure periodic checking of the External Workers and Volunteers Register for annual unregistered Worker attendance totals. (d) Periodically assess compliance with the RWVP requirements as set out in this Policy. (e) Ensure all matters that could alter a Worker's RWVP registration status are reported to the Registrar for RWVP registration in a timely manner.
<b>Workplace Managers</b>	(a) Ensure the relevant Principal Lead has been contacted and approved the use of an Unregistered worker to undertake work of an EMERGENCY repair nature to ensure the safety of children and staff members and/or to ensure the site can continue to operate appropriately. (b) Ensure adequate checking of external worker and volunteer RWVP registration upon initial entry per year to a CET School Environment. (c) 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"> <li>Full name.</li> <li>Their RWVP registration number.</li> <li>The date and outcome of periodic RWVP verification (not required for workers whose RWVP is linked to the school).</li> <li>The expiry date of their registration.</li> </ol> (d) 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. (e) Monitor and record unregistered Worker attendance in a CET School Environment using the External Workers and Volunteers Register.
<b>Staff</b>	(a) Update their RWVP details, using the RWVP webpage, within ten (10) days of commencing work with CET. (b) 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. (c) Be responsible for applying for, payment of prescribed fees and maintaining the appropriate type of RWVP. (d) Renew their RWVP prior to expiry.

	<p>(e) Provide evidence of RWVP renewal, in accordance with the specified means, to the relevant CET payroll service.</p> <p>(f) Complete designated child safety training course(s) on an annual basis.</p> <p>(g) Notify the Executive Director of CET in writing, within seven (7) days of having their RWVP suspended or cancelled.</p>
<b>Workers</b>	<p>(a) Comply with this Policy</p> <p>(b) Provide proof of RWVP 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.

## 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.

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**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.

Incidental contact refers to unplanned contact with children that may occur during a person's work or volunteer duties.

An example of incidental contact in a regulated activity includes:

1. A person works as a payroll officer in the Head Office of a company that runs childcare centres across Tasmania. As part of their normal work duties, the person does not have any contact with children or communicate with children. So, the person does not need to register to work with vulnerable people.
2. If a group of children visits the Head Office on a school tour, where the person tells the children about their job, they still do not need registration. This is considered incidental contact.
3. If the person visits some of the childcare centres to pick up papers from the 'back of house' area every so often, they still do not need registration. This is also considered incidental contact.

HOWEVER:

If the person is promoted to the role of Centre Manager where they regularly go into the childcare rooms to direct staff, the person will need to be registered. This is considered more than incidental contact.

**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 RWVP registration and who is not being supervised by a Staff member who holds a current RWVP 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.

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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.

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## **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.

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## **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.