

Working with Children Checks – Student Monitoring Procedure - SA

Procedure Code: PR-058

Version: 2.0

Effective Date: 9 November 2020

Related Policy Code: STU-003

Related Policy Name: Working with Children Checks Policy

Purpose

This procedure outlines the process to be followed when a student on the Adelaide campus enrolls into a course with a practicum component that requires them to possess a current Working with Children Check (WWC Check) as a condition of enrolment and the Quality & Compliance Department are required to monitor and report on the status of student WWC Checks.

Definition of “College” – *In the higher education sector, the Australian College of Natural Medicine Pty Ltd (ACNM) trades as Endeavour College of Natural Health. For the purpose of this procedure, any reference to ‘College’ or ‘the College’ should be considered a reference to each or any of these respective trading names / entities.*

Scope

- Adelaide Students
- Adelaide Student Services Staff
- Adelaide Wellnation Clinic Supervisors
- Adelaide Campus Management
- Nominated Officers of the College

Procedure:

Overview

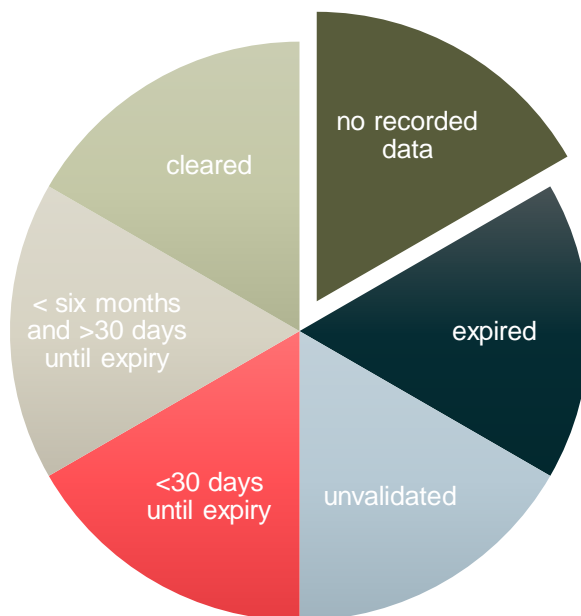
Any person enrolling into a course that has a work integrated learning / practicum component requires a WWC Check.

In South Australia, students requiring a WWC Check are required to undergo ‘DCSI Child-related Employment Screening Clearance’ and obtain a ‘Clearance Letter’ as evidence they have been successful. Once the clearance letter has been presented to the College and validated by a Nominated Officer, information pertaining to the clearance letter is recorded in the student’s SMS file, in the Admissions & Enrolment tab.

As students apply for screening throughout the calendar year, and each clearance letter is valid (unless cancelled) for a period of three (3) years, it is necessary to monitor and report on the status of the validated clearances in an ongoing manner to ensure work integrated learning / practicum component participation is prevented without a valid and validated DCSI Child-related Employment Screening Clearance.

The College shall monitor the expiry dates of all recorded screening clearances to ensure currency is maintained for students undertaking work integrated learning / practicum components and clearance renewals are initiated and followed up within required timeframes. For students enrolled at the Adelaide campus, the Director, Student Services & Retention has delegated this to the Quality and Compliance Department.

Monitoring and reporting must occur on a monthly basis at a minimum. Outcomes must be reported to (all) Requesting Officers on a monthly basis. See *Working with Children Checks - Student Application Procedure - SA*, 'Nominated Officers' section.



Any student identified as no longer cleared by a WWC Check for work integrated learning / practicum components shall be excluded from work integrated learning / practicum components immediately by the Director, Student Services & Retention. The Director, Student Services & Retention shall advise the Associate Director - Clinical Services and the relevant Head/s of Department when a student is to be excluded.

The decision shall stand until such time as the student who requires a WWC Check:

- is granted a DCSI Screening Child-related Employment Clearance or is granted as exemption; and
- the clearance or exemption is evidenced, validated and recorded by the College.

Having lodged an application for screening clearance (without yet having received clearance) **is not sufficient** under the current legislation for SA students.

Maintenance

Ensuring that students apply for and obtain a WWC Check does not fulfil the College's responsibilities. The College is obligated to ensure any WWC Check remains current and valid for all students partaking in work integrated learning / practicum component and this is performed through system maintenance procedures such as monitoring the status of WWC Checks.

For students on the Adelaide campus, the Director, Student Services & Retention has delegated the initial monitoring and reporting tasks to the Quality & Compliance Department. Secondary monitoring and reporting may be required however due to the confidential nature of the data involved the task may involve the Office of Student Records.

This procedure outlines the steps to perform initial monitoring and reporting.

Initial Monitoring

Data Exporting

The Quality & Compliance Department are required to export data reports from FileMaker and sort the data therein to establish the status of WWC Checks currently recorded for students on the Adelaide campus.

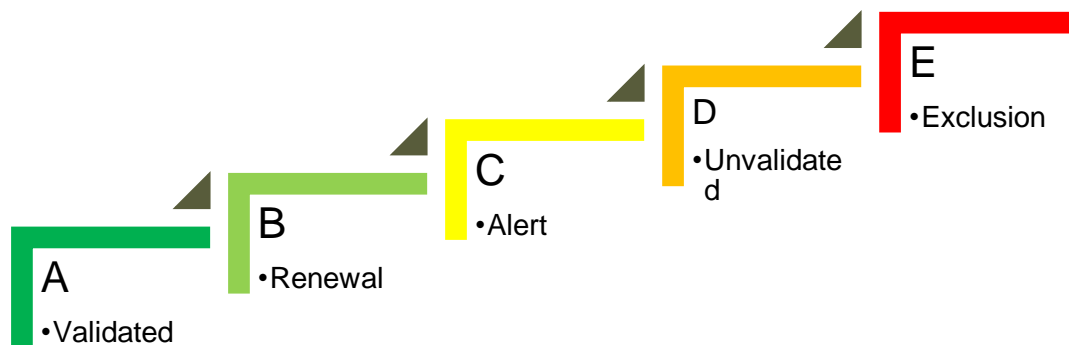
This monitoring must take place on a monthly basis at a minimum, and may occur more frequently in preparation for an upcoming study period. Quality & Compliance Department shall nominate the chosen time of the month at which reporting shall continuously occur. Should this timing need to be altered, **prior** approval shall be sought from the Director, Student Services & Retention in each instance.

This is to ensure all action taken by the College is timely and proactive, and students are given every opportunity to rectify outstanding WWC Checks **before** attendance requirements for a work integrated learning / practicum component may be impacted.

The Quality & Compliance Department shall export and filter the data to establish the priority of follow up action required. As work integrated learning / practicum component are delivered via on-campus subjects, online subjects do not require monitoring or reporting. Adelaide reporting shall be limited to: Bachelor of Health Science degrees regardless of specialisation; and Honours enrolments when identified by the Office of Research as pertaining to child-related work (research projects).

Categories of Risk

Once the data has been sorted, students shall be managed according to a risk rating system, where Category A is the lowest risk category, and Category E, the highest. In instances where a student may fall in to more than one category, they shall be managed under the higher risk category.



Category A - Validated - Students cleared for work integrated learning / practicum component subjects

- ⌚ Students that possess a current and validated WWC Check with more than six (6) months before expiry.

Category B - Renewal - Students due for renewal

- ⌚ Students that have presented a valid or current WWC Check which has been validated by the College and the timeframe until expiry is six (6) months or less, but greater than 30 days.

Category C - Alert - Students approaching exclusion from work integrated learning / practicum component subjects

- ⌚ Students that have presented a valid or current WWC Check which has been validated by the College and the timeframe until expiry is less than 30 days.
- ⌚ Automatic alert in FileMaker generated to highlight expired check details.

Category D - Invalidated - Students pending validation

- ⌚ Students that have presented a valid or current WWC Check however the WWC Checks *has not* been validated* by the College (Check recorded as received however 'Date Validated' and 'Validated By' data fields are empty).

* Includes students that *were not able to be validated* using the online validation tool. Students that were not able to be validated using the online validation tool shall contact DCSI Screening Unit for further information and remain excluded from work integrated learning / practicum component subjects in the interim.

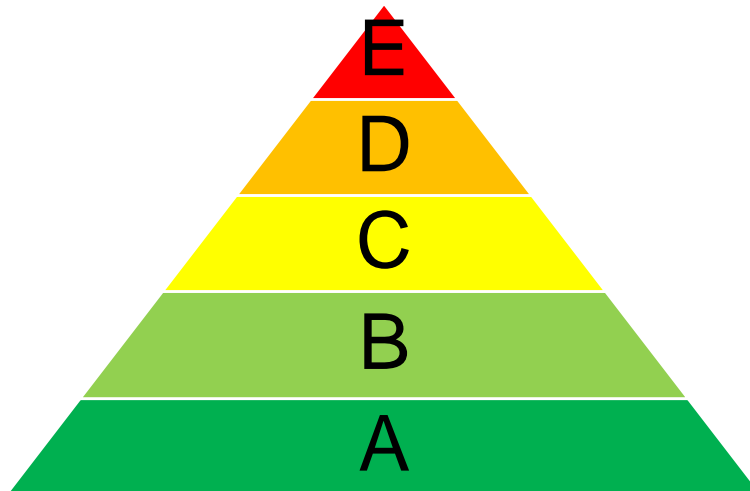
Category E - Exclusion - Students to be excluded from work integrated learning / practicum component subjects

- ⌚ Students that have not presented a valid or current WWC Check (All WWC Check data fields are empty **or** fields are filled in however Expiry Date has passed).
- ⌚ Automatic alert in FileMaker generated to highlight expired check details.

Providing Reports

The aim is to ensure no student falls into Categories C, D or E. It is the intention of the College that once this procedure is well established:

- Students shall move between Category's A and B: renewing their WWC Check promptly, to avoid moving into Category C, and
- Students entering categories C-E will through the College's diligence, continue to reduce in number over time.



Compliance Staff shall ensure reports reflect the different categories in an easily interpretable manner. This shall be achieved by colour coding, and adding one column of data stating the applicable 'Category' on a per student basis; and second column for follow up related 'Comments'.

Preventative and Remedial Action

Not all students will require action or follow up on a monthly basis however the status of each student shall be reviewed on a monthly basis to assess the level of action required, if any.

Students that fall under Category A do not require action. As time passes, students that once fell into this category shall eventually move into Category B where it is expected that they will renew their WWC Check after being prompted by a College-initiated email issued by the DCSI Screening Unit (portal).

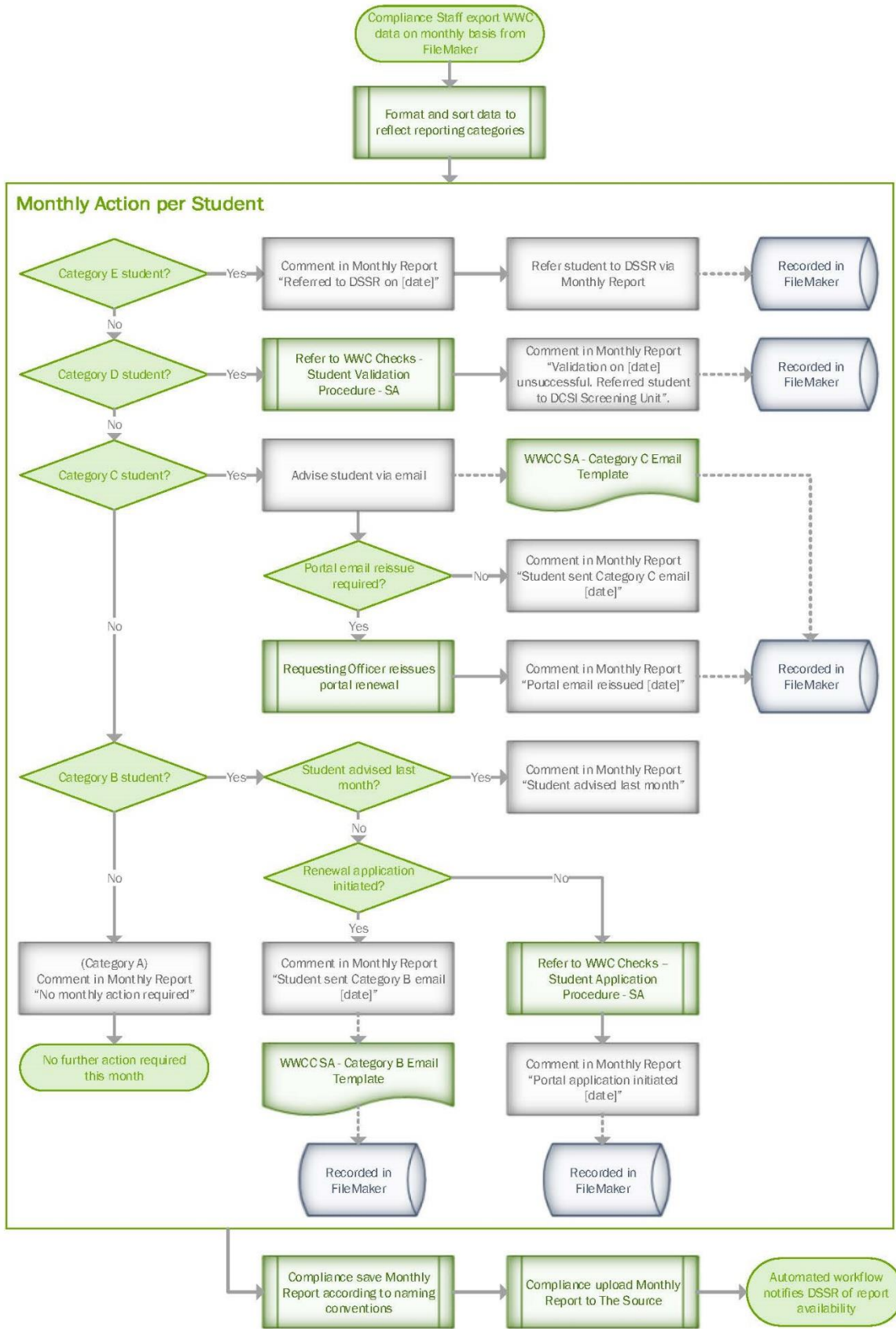


Figure 1 WWC Checks - Student Monitoring - SA: Monthly Maintenance

Category E - These students shall be referred to the Director, Student Services and Retention. This referral action shall be recorded in each affected student SMS file as a communication log (Category: Blue card/WWC Checks), and recorded in the Monthly Report with comment "Referred to DSSR on [date]".

Note: If an international student, include National Higher Education Compliance Manager in referral action.

Category D - Requesting Officers shall attempt validation of DCSI Screening Unit Child-related Employment Clearance Letters. Note: Validation is to occur when the student presents their Clearance Letter, as per the Validation Procedure. Shall an outcome of a 'Person Search' not successfully validate a student's clearance, ensure the details are being entered correctly. Should the search remain unsuccessful, refer the student to the DCSI Screening Unit for further advice. Record in FileMaker and the Monthly Report that this action has been taken. Record in the Monthly Report with comment "Validation on [date] unsuccessful. Referred student to DCSI Screening Unit".

Category C - Students shall be contacted by email using the *WWCC SA - Category C Email Template* which advises that:

- An email from the DCSI Screening Portal has been issued and states the action required to renew their clearance, and
- Should they not meet the requirements of the *Working with Children Checks Policy* prior to the expiry date of their existing clearance, they will be excluded from attending work integrated learning / practicum component subjects in which they are enrolled and this will impact attendance requirements and may result in a Fail grade.

If the student requires the email from the DCSI Screening Unit to be re-sent, they shall request this in writing via email to wwcchecks@endeavour.edu.au and the Quality & Compliance Department shall respond promptly.

Record in FileMaker and the Monthly Report comments which of these actions have been taken:

- "Student sent Category C email [date]", and/or
- "Portal email reissued [date]".

Category B - Students due for renewal shall be prompted to renew their Clearance Letter firstly via an email from the DCSI Screening Unit organisational portal. For this to occur, a Requesting Officer shall initiate the application procedure, in accordance with the *Working with Children Checks - Student Application Procedure - SA*. Once the application process has been initiated and the student has received their portal email, further contact with the student shall be made directly **every second calendar month** by the Quality & Compliance Department using the *WWCC SA - Category B Email Template*. Students from category B shall be contacted no more than once every 28 days.

Record in FileMaker and the Monthly Report which of these actions have been taken:

- "Portal application initiated [date]" (initial contact)
- "Student sent Category B email [date]" (subsequent bi-monthly contact)
- "Student advised last month" (alternate monthly contact)

Category A - No follow up is necessary. Renewal applications will not be processed by the DCSI Screening Unit more than six (6) months prior to the current clearance expiry date.

Communicating Compliance Reports

Once exported, required action is completed and the Monthly Report is ready for publishing, the report shall be:

- Saved according to naming conventions ([Campus]_[Year]_[Month]_WWCC Report), and
- Uploaded to the WWC Checks storage facility in The Source.
- The Quality & Compliance Department will notify all Authorised Officers via email that the report is now available.

Definitions

Authorised Officer - This person is required to have a working knowledge of the screening applicant's prospective role and duties and has the high-level responsibility and authority to make recruitment and employment decisions in relation to the applicant.

The DCSI Screening Unit may liaise with the Authorised Officer in cases where potential risks have been identified during an assessment. Only the Authorised Officer will receive confidential screening assessments relating to students.

Clearance Letter - For the purpose of this procedure, any reference to 'clearance letter, or 'letter', should be considered a reference to DCSI Child-related Employment Screening Clearance Letter issued by the DCSI Screening Unit on behalf of the South Australian Government.

Exemption - Refers to an instance where an applicant is free from obligation to obtain a WWC Check and provides appropriate evidence to the College that either: reflects the WWC Check is not legislatively required or; an equivalent screening process or background check ('equivalent') has been undertaken. Refer to [Working with Children Checks Policy](#).

Requesting Officer - This person is the primary contact in the organisation regarding administrative matters associated with screening applications. Requesting Officers will receive notification emails from the DCSI Screening Unit including when an applicant receives a general clearance.

Site Administrator - This person manages the Organisation's registration on DCSI's on-line application system and is responsible for completing the organisation's initial registration and maintaining the currency of the registration.

Validation - Refers to the process undertaken by any Nominated Officer after a Clearance Letter is presented to the College and before a student is cleared to participate in work integrated learning / practicum component subjects. Details from the letter are confirmed by the DCSI Screening Unit and the College accepts the WWC Check evidence as current and valid until such time as the letter expires or is cancelled.

Note: Validation and verification are separate processes.

Verification - Refers to the process of verifying an applicant's Proof of Identity documentation and is performed by a 'Verifying Officer'.

Verifying Officer - This person is responsible for verifying the applicant's identification using the one hundred (100) point check.

Verifying Officers must meet the requirements set out in [Permitted Verifiers Information Sheet](#).

WWC Check - For the purpose of this procedure, any reference to 'WWC Check', 'Check', 'DCSI Screening Clearance', or 'Clearance', should be considered a reference to DCSI Child-related Employment Screening Clearance issued by the DCSI Screening Unit on behalf of the South Australian Government.



Further Information

Related Policies

- Academic Progression Policy - Higher Education*
- Academic Progression Policy - VET*
- Admissions Policy - Undergraduate - Higher Education*
- Admissions Policy - VET*
- Working with Children Checks Policy*

Related Procedures

- WWC Checks - Student Application Procedure - SA*
- WWC Checks - Student Validation Procedure - SA*

Related Documents

- WWCC SA - Category C Email Template*
- WWCC SA - Category D Email Template*
- Working with Children Checks (WWC Checks) FAQs*
- Clinic Handbook*
- Clinic Guide - FAQs*

Instructions

- Instructions - Recording WWC Checks - SA*
- Instructions - Validating WWC Checks - SA*
- Instructions - Monitoring WWC Checks - SA*
- Instructions - Reporting WWC Checks*

Benchmarking

Not Applicable

Supporting Research and Analysis

Not Applicable

Related Legislation

Not Applicable

Review and Approval

Procedure Author

Higher Education Compliance Administrator

Procedure Owner

National Quality, Governance and Compliance Manager

Contact

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Approval Body

Not Applicable

Procedure Status

Reviewed

Responsibilities for Implementation

- Director of Clinic and Campus Operations
- Director of Education
- Director, Student Services & Retention
- Quality and Compliance Staff
- Student Services Staff

Key Stakeholders

- Director of Clinic and Campus Operations
- Campus Managers and Coordinators
- Director of Education
- Director, Student Services & Retention
- Educational Technologies Manager
- National Quality, Governance and Compliance Manager
- National Student Records Coordinator
- Student Services Staff