



# Guidance on Working with Vulnerable People Reporting Requirements for Grant Recipients

## Overview

As part of the National Indigenous Australians Agency's (NIAA) response to the Royal Commission into Institutional Responses to Child Sexual Abuse, in July 2018 the NIAA introduced Working with Vulnerable People, including Children (WWVP) requirements for all grant recipients.

## What are the WWVP reporting requirements?

Grant recipients are required to comply with the WWVP and provide the NIAA with annual confirmation of their compliance with the WWVP requirements included their funding agreements. This is the Annual Statement of Compliance declaration due in October each year.

### 1. Risk Assessments

Grant recipients must:

- assess their level of contact with vulnerable people, including children for each activity funded by the NIAA (please see Table 1); and
- if there is any contact with vulnerable people – whether Low, Medium, High or Extreme – undertake a full risk assessment to identify and analyse all risks of harm or abuse to vulnerable people, including children, in relation to the activity; and implement appropriate strategies to manage those risks.

**Table 1: Risk Self-Assessment**

| What level of contact does the grant recipient have with vulnerable people for the funded activity? | None                                               | Low                                                                                                                                                                                                                                                        | Medium                                     | High                                     | Extreme                                  |
|-----------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|------------------------------------------|------------------------------------------|
|                                                                                                     | No contact with vulnerable people                  | Contact with vulnerable people in very limited circumstances                                                                                                                                                                                               | Contact with vulnerable people on occasion | Contact with vulnerable people regularly | Contact with vulnerable people every day |
| Annual reporting to be provided to NIAA                                                             | Confirmation of no contact with vulnerable people. | <ul style="list-style-type: none"><li>- Confirmation that a Risk Assessment is in place</li><li>- Confirmation of compliance with State and Territory Legislation</li><li>- Confirmation that staff training and compliance regimes are in place</li></ul> |                                            |                                          |                                          |



The NIAA does not mandate the form a risk assessment must take. A risk assessment might be basic and short for an activity where there is low contact with vulnerable people, and more detailed for an activity involving contact with vulnerable people every day. Grant recipients are encouraged to access resources available on the websites for the relevant legislative body in the State or Territory where the activity is being delivered.

Additional risk assessment tools and guidance can also be found on the Australian Human Rights Commission's [Child Safe Organisations](#) and the [National Office for Child Safety](#) websites:

[Child Safe Organisations: Introductory Self-Assessment tool](#)  
[Child Safety Risk Identification Checklist](#)  
[Child Safety Risk Management Guide](#)

## 2. Compliance and Training Regime

Grant recipients with activities that have any contact with vulnerable people must have in place WWVP compliance and staff training regimes for those activities. These are necessary to make staff aware of, and compliant with, relevant legislation in the locations where the activities are being delivered, including Working with Children Checks and mandatory reporting requirements.

A compliance regime in this context is a procedure in place for each funded activity to ensure that the grant recipient is complying with relevant legislation for WWVP.

Examples of compliance regimes:

- Including WWVP checks in recruitment and engagement processes
- Including WWVP requirements in employment contracts
- Conducting regular reviews to make sure all staff and contractors are compliant with requirements like training and holding a current WWVP card
- Maintaining up-to-date registers of the required WWVP registrations and checks, as well as criminal history and police checks
- Having processes and systems in place to easily update WWVP records by those in an authorised position
- Policies on the immediate and longer-term steps to take if a staff member or relevant third party fails to comply with WWVP requirements.

Examples of training regimes:

- Developing WWVP policies and guidance material that are easy to access and understand
- Regular training to staff and relevant third parties on complying with WWVP State and Territory legislation
- Education and training on WWVP safety to promote awareness and understanding of risks and organisational responsibilities
- Making sure staff and contractors have easy access to state and Territory Legislation for WWVP
- Making WWVP a key feature of induction training and guidance.

The Australian Human Rights Commission has developed practical tools and resources to support organisations in implementing the National Principles for Child Safe Organisations. These include a suite of 11 [E-learning modules](#).

These modules are designed to support people working or volunteering in organisations that engage with children and young people. This includes organisations of all sizes, across all sectors, and throughout Australia. The modules offer foundational knowledge, along with links to more detailed resources and practical tools to support implementation.



There is an introductory module that provides an overview of the development and content of the National Principles, followed by individual modules dedicated to each of the 10 Principles. Each module takes about 20 minutes to complete. Together, the modules provide your organisation with a free, ready-made WWVP training package that reflects national better practice.

### 3. Compliance with Legislation for WWVP

Grant recipients with NIAA funded activities that include any contact with vulnerable people must confirm annually that Personnel working with vulnerable people on those activities comply with relevant WWVP legislation (such as Working with Children Checks and mandatory reporting requirements) for the locations where the activities are being delivered. The definition used in funding agreements is very broad, so you need to take care to include everybody:

Personnel means a funded organisation's officers, including all directors and board members, employees, agents, contractors, subcontractors and volunteers.

The NIAA cannot advise whether Personnel working with vulnerable people on funded activities are compliant with relevant legislation. If you're unsure whether a person working with vulnerable people complies with relevant legislation for WWVP, you must contact the relevant legislative body in the state or territory where the activity is being delivered for advice.

## How does the NIAA define WWVP?

State and Territory legislation and definition of working with vulnerable people varies across Australia. NIAA uses the broader definition of working with vulnerable people, including children. The definition used in funding agreements is as follows:

A vulnerable person means a child, being an individual under the age of 18 or an individual aged 18 years and above who may be unable to take care of themselves against harm or exploitation by reason of a, illness, trauma or disability or any other reason.

## Where can I get further information?

There are a number of practical tools and resources available that will assist grant recipients to promote a culture of child safety and wellbeing in ensuring compliance with their WWVP obligations. The National Office for Child Safety have created the Keeping Our Kids Safe resources that support organisations working with Aboriginal and Torres Strait Islander children, young people and communities to implement the National Principles for Child Safe Organisations. More information is available at the following links:

- [Keeping Our Kids Safe: Cultural Safety and the National Principles for Child Safe Organisations \(Guide\)](#)
- [The National Principles for Child Safe Organisations](#)
- [Practical tools for Implementing the National Principles](#)
- [Royal Commission into Institutional Responses to Child Sexual Abuse - Final Report](#)



If you have any questions, please liaise with your NIAA contact or refer to the following state/territory links for further information:

- Australian Capital Territory  
[Working With Vulnerable People - Access Canberra](#)
- New South Wales  
[Working with Children Check | Service NSW](#)
- Northern Territory  
[Working with children clearance: apply and renew | NT.GOV.AU](#)
- Queensland  
[Blue cards for working with children | Your rights, crime and the law | Queensland Government](#)
- South Australia  
[SA.GOV.AU - Screening checks](#)
- Tasmania  
[RwVP - Application Start | TAS](#)
- Victoria  
[Working with Children Check | vic.gov.au](#)
- Western Australia  
[Working with Children Check | WA](#)

