2021–22 Commonwealth Child Safe Framework

Annual Statement of Compliance

Our commitment to child safety

The Australian Communications and Media Authority (ACMA) and the eSafety Commissioner (eSafety) are committed to helping keep children and young people free from abuse or harm, and that all our interactions with them uphold their rights. Part of our remit is to help safeguard all Australians, including children and young people, from abuse or harm that may occur across the communications and media environments for which the ACMA and eSafety have regulatory responsibility.

How we comply with the Framework

Our Child Safety Policy is a key part of how we have implemented the Commonwealth Child Safe Framework and the National Principles for Child Safe Organisations. The Policy clearly outlines our approach to being a child-safe organisation and informs our leaders and workers about their obligation to act legally and ethically towards children and young people. The Policy was developed in consultation with all workers, promoted broadly and reviewed in May 2022. In addition, eSafety has issued operational guidelines and standard operating procedures to guide our workers when supporting vulnerable children and young people.

The ACMA and eSafety have formed a Child Safety Working Group to collaborate and monitor all aspects of child safety. The Working Group coordinated and reviewed the 2021–22 child safety risk assessment, which found that the ACMA and eSafety have a low-medium child safety risk rating due to the nature of work undertaken by eSafety. Risks identified included a lack of awareness of child safety requirements, vicarious trauma, psychological abuse and sexual abuse. The overall rating considered the ACMA and eSafety's established child safety governance arrangements, rare in-person interactions with children and eSafety's regular contact with vulnerable children through phone and online conversations.

In addition to the Policy and operational guidelines, the ACMA and eSafety have general governance arrangements in place that support child safety. These arrangements include ACMA's recruitment, induction and training processes, security and fraud measures, performance management procedures, procurement of goods and services and technical mitigations that monitor the use of ACMA and eSafety ICT assets.

How we interact with children in our work

A part of eSafety's role is to provide education and specialist support to children and young people to prevent and address online harms, such as cyberbullying and image-based abuse. Online safety education is provided through various platforms including online resources for teachers, advice through our website, virtual classrooms and our Trusted eSafety Provider Program. Support for children and young people reporting online harms through our regulatory schemes is provided through phone calls and emails. Given the nature of this work, eSafety workers are likely to be considered mandatory reporters under some state and territory child protection laws. These workers also have an increased chance of encountering child abuse offences that are required to be

reported to police under some state and territory criminal laws. To address the specialist nature of eSafety's work, the operational guidelines outline our internal procedures on these legal requirements. These workers are also provided specialised training on their roles and responsibilities.

How we monitor our compliance

eSafety has developed a detailed implementation plan to monitor the implementation of the 10 National Principles and 42 Key Action Areas and measure ongoing compliance. The implementation plan is overseen by the eSafety Risk and Compliance Committee that also oversees other systems of risk management and internal control. We continue to embed the policy, risk controls and guidelines in day-to-day operations.

For these reasons we assess our compliance with the CCSF as:

Requirement 1 - Compliant	Requirement 2 - Compliant
Undertake risk assessments annually in relation to activities of the entity, to identify the level of responsibility for, and contact with, children, evaluate risks to child safety, and put in place appropriate strategies to manage identified risks.	Establish and maintain a system of training and compliance, to make staff aware of, and compliant with, the Framework and relevant legislation, including Working with Children Checks / Working with Vulnerable People Checks and mandatory reporting requirements.
Requirement 3 – Mostly Compliant	**Requirement 4 - Compliant**
Adopt and implement the National Principles for Child Safe Organisations.	Publish an annual statement of compliance with the Framework including an overview of the entity's child safety risk assessment.

Future child safety initiatives

In the next 12 months, the ACMA and eSafety will continue to lower our child safety risks, further protect children from harm and embed the National Principles in our work culture. This work includes ongoing improvement of training materials, improved record keeping procedures, greater internal communications as well as ongoing consultation with young people.

Members of the public, children, young people, parents, carers, guardians, families and communities should feel confident that the ACMA and eSafety, when working with children or young people, will provide a safe environment in which their rights, needs and interests are upheld.

Nerida O'Loughlin PSM
Chair and Agency Head
Australian Communications and Media Authority
24 October 2022

Julie Inman Grant
eSafety Commissioner
The eSafety Commissioner
19 October 2022