



Working with Children Check



VICTORIA

Victorian
Auditor-General

Working with Children Check

Ordered to be printed

VICTORIAN
GOVERNMENT PRINTER
October 2008

ISBN 1 921060 83 2

VAGO

Victorian Auditor-General's Office
Auditing in the Public Interest

The Hon. Robert Smith MLC
President
Legislative Council
Parliament House
Melbourne

The Hon. Jenny Lindell MP
Speaker
Legislative Assembly
Parliament House
Melbourne

Dear Presiding Officers

Under the provisions of section 16AB of the *Audit Act 1994*, I transmit my performance report on the implementation of the *Working with Children Check*.

Yours faithfully



D D R PEARSON
Auditor-General

29 October 2008

Foreword

The Working with Children Check (WWCC) was established to reduce the risk of physical and sexual harm to children by stopping unsuitable people from working or volunteering to work with them. This audit examined the effectiveness, efficiency and economy of the WWCC.

The audit found that the Department of Justice (DOJ) is managing the implementation of the WWCC well in spite of short time frames and the stronger than anticipated demand.

We identified areas for improvement including:

- the WWCC card renewal period
- document maintenance relating to complex applicant assessment files
- an internal review of decisions, following the issuing of Interim Negative Notices.

The department estimates that by 2011 around 650 000 people who work or volunteer with children will be subject to the check. This equates to around 20 per cent of all Victorians aged between 18 and 65 years. Although there is a very real need to protect vulnerable children from individuals whose history suggests they pose an increased threat, this check significantly extends the notion of *in loco parentis*.

Administration of the WWCC is a complex task not just because of the sheer volume of applications, but because of the need to balance the protection of children against the imperatives of natural justice and the protection of an individual's privacy. Although protecting children is the government's prime objective, it is important that there are administrative safeguards to defend the civil liberties of those who may otherwise have irrelevant past convictions, and those who have already received their punishment through the criminal justice system.

In regard to the significant expense of administering WWCC and the substantial number of people who are subject to the scheme, DOJ needs to develop outcome measures that will enable it to determine the extent to which the WWCC assists in protecting children from physical and sexual harm. Such measures could provide valuable input into the review of the WWCC legislation scheduled for 2009.



D D R PEARSON
Auditor-General

29 October 2008

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1 Executive summary

1.1 Introduction

In September 2005, the Victorian Parliament passed the *Working with Children Act 2005*. The Act established the Working with Children Check (WWCC). It is designed to help protect children from physical and sexual harm by ensuring that the suitability of those who work with or volunteer with children is checked by an appropriate body.

Applicants for the WWCC are subject to a minimum assessment of suitability through a review of their criminal history for serious sexual, violence and drug offences.

The WWCC assessment process is managed through the WWCC Unit in the Department of Justice (DOJ). The WWCC is being phased in over a five-year period from 1 July 2006, with new categories of child-related employment being introduced each year. DOJ anticipates that by 2011 approximately 650 000 Victorians who work or volunteer in child-related work will be subject to the check.

The audit examined:

- whether the WWCC system had been implemented effectively
- whether the WWCC system had an adequate quality assurance framework
- evidence of improved outcomes as a consequence of the system's establishment
- if the operation of the WWCC system was economical and efficient.

The audit focused on the WWCC Unit, which has responsibility for administering the Act. The WWCC Unit oversees the WWCC implementation plan, application and assessment processes and the issuing of WWCC Assessment Notices and WWCC Cards.

1.2 Findings

Implementation of the WWCC

DOJ demonstrated a clear and comprehensive approach to the implementation of the WWCC, establishing all key components of the project on schedule. We found that:

- DOJ developed a comprehensive implementation plan that incorporated key elements of project management, including milestones, resource allocation, oversight arrangements, quality assurance and evaluation
- major risks were identified and monitored through a risk register and senior management maintained oversight throughout the implementation process, establishing clear accountabilities

- the implementation process was closely monitored and reviewed for progress
- stakeholder input was sought throughout the implementation process and a communications strategy was developed that appropriately targeted relevant client groups.

We concluded that there is scope for DOJ to extend the WWCC card renewal period, based on the current effectiveness of the ongoing monitoring arrangements in place with Victoria Police.

Quality assurance

DOJ has established a comprehensive quality assurance framework that provides an appropriate level of control and review over WWCC application and assessment processes. We found that there was:

- a detailed quality plan and risk register to identify and mitigate risks and set standards for managing the quality of service delivery
- a comprehensive data verification process, with internal audits and external reviews
- a continuous improvement approach to the development and enhancement of operational systems and processes
- appropriate guidance, training and support for staff.

DOJ has a formal Triage Panel that confirms relevant offences and determines if additional information is required to enable the applicant to be assessed against the factors in the Act, which must be taken into account for applications with relevant offences. However, the process lacks a formalised systematic approach to determining when further information is required and the reasons for arriving at these decisions is poorly documented.

The audit identified areas for improvement, particularly in relation to the review and assessment process and the need to record the reasons for decision on the Triage Action Cover Sheets (TACS).

In relation to the Triage Panel process, current operational procedures would be improved by:

- establishing formal risk guidelines to inform the process of determining when section 11 requests to applicants for further information should be issued
- ensuring the reasons for decisions are recorded on the TACS.

In relation to the review and assessment process, where the Secretary DOJ has exercised discretion to issue an Interim Negative Notice, a process for applicants to request an internal review of the decision prior to the issue of a Negative Notice should be established.

Efficiency and effectiveness of the WWCC system

The WWCC system has processes that enable monitoring, management and reporting of operational costs and key processes.

Management information provided through the WWCC Unit's monthly activity report covers a range of operational and financial issues but could be improved through the:

- inclusion of narrative information that explains the drivers of the system's actual operating costs and any variations from budget
- inclusion of the full suite of contractors' performance measures
- refinement of benchmark targets to assess internal operational performance.

The overall objective and expected outcome of the WWCC is clearly defined in the *Working with Children Act 2005*. DOJ helps to protect children from sexual and physical harm by ensuring that the suitability of those who work or volunteer with children is checked by an appropriate body.

The relevant output measures specified in Budget Paper No. 3 are not sufficient to demonstrate the effectiveness of the WWCC system.

DOJ should build on the information it has collected and reported through its monthly activities reports on the operations of the WWCC Unit and continue to develop performance measures and associated benchmark targets to enable it to report on the economy and efficiency of its operations.

1.3 Conclusion

DOJ complies with the legislative requirements of the *Working with Children Act 2005* and has implemented the WWCC system effectively and efficiently. DOJ has demonstrated:

- a clear and comprehensive approach to the implementation of WWCC system
- the implementation of child-related work categories, to be phased in over the five-year period, is based on the perceived risk that these occupations present to children
- that key implementation milestones have been achieved despite stronger than anticipated demand for WWCC by the community
- that it has established a quality assurance framework that provides an appropriate level of control and review over WWCC application and assessment processes
- that the WWCC system has processes that enable monitoring, management and reporting of the system's operational costs and key processes.

The overall objective of the WWCC is clearly defined in the Act and since 1 April 2006, 85 applicants have been deemed unsuitable for child-related work, having received a Negative Notice and, as at 30 June 2008, 63 have received an Interim Negative Notice.

Areas for improvement in the administration of the WWCC system include:

- extending the card renewal period, based on the effectiveness of the ongoing monitoring arrangements in place with Victoria Police acting to mitigate the risk of current WWCC cardholders becoming unsuitable to work with children
- better documentation of reasons for decisions taken at the Triage process

- establishing a process for applicants to request an internal review of decisions following issue of Interim Negative Notices
- enhancing performance monitoring and reporting of WWCC operations and costs.

Given the considerable public resourcing of the WWCC scheme, DOJ should be developing quality measures that demonstrate the effectiveness of the WWCC system in achieving the scheme's objectives.

1.4 Recommendations

Implementation of the WWCC

Subject to cost-benefit and risk assessments, DOJ should consider extending the period for which WWCC cards are valid. **(Recommendation 3.1)**

Quality assurance

DOJ should:

- ensure that reasons for decisions made during the Triage process are comprehensively documented on the Triage Action Cover Sheet (TACS) and applicant files
- establish pre-assessment guidance for Triage that ranks or filters WWCC applications using risk-based criteria
- where the Secretary has discretion, enable an applicant receiving an Interim Negative Notice to request an internal review by a suitably qualified independent person. **(Recommendation 4.1)**

Efficiency and effectiveness of WWCC system

DOJ should develop performance measures that demonstrate the achievement of the objectives and expected outcomes of the WWCC scheme. **(Recommendation 5.1)**

RESPONSE provided by Secretary Department of Justice

The Department of Justice welcomes the report and its conclusions regarding the effective and comprehensive implementation of the Working with Children Check. The purpose of the Working with Children Check is to assist in protecting children from physical or sexual harm by ensuring that people who work with children in either a paid or unpaid capacity, have their suitability to do so checked. The significant number of Victorians who have already applied for a Working with Children Check demonstrates the community's support for initiatives that help to keep children safe. It is also an example of a strong partnership between the community and government, together helping to create safe environments for Victoria's children.

RESPONSE provided by Secretary Department of Justice – continued

The department is committed to providing high quality services to the community. As noted in the report, the Working with Children Check operates with a focus on continuous improvement. It therefore welcomes the report and the opportunity to further enhance and refine the operations of the Working with Children Check as it continues along its implementation pathway.

The department generally supports the recommendations in the report, and careful consideration will be given to the implications resulting from them.



2 Background

2.1 Background

2.1.1 Origins

In establishing the Working with Children legislation in Victoria, the state government reviewed similar checking processes in New South Wales and Queensland, and monitored the introduction of a similar scheme in Western Australia. An overview of interstate working with children schemes is provided at Appendix A. Regard was also given to the Birchard Inquiry in the United Kingdom, which found that failures in recruitment strategies and background checks had been contributing factors to incidents of abuse, such as the murder of two British schoolgirls by a school caretaker in 2002.

Working with Children Exposure Draft Bill 2003

The Victorian Government's intention to introduce legislation to prohibit convicted sex offenders from having direct unsupervised access to children was first announced by the Attorney-General in July 2002, and the *Working with Children Exposure Draft Bill 2003* was released for public consultation in late 2003.

Working with Children Bill 2005

In late 2004 DOJ redrafted the legislation when the then Premier requested the Attorney-General to develop a new Exposure Draft Bill imposing tougher conditions. These were to include criminal records checks, with convictions for 'relevant offences' (based on the list contained in the *Sex Offender Registration Act 2004*) making persons automatically ineligible for employment in professions with regular contact with children.

The draft legislation and second discussion paper generated considerable public discussion and controversy. More than 160 written submissions were received by the department and a number of articles, letters and editorials appeared in the daily media.

More than half the submissions raised the issue of the cost of the Working with Children Check (WWCC) and potential adverse effects on organisations, employment and volunteering. Sporting and volunteer groups argued that the WWCC should be free for volunteers.

Many submissions concerned exemptions to the scheme and cited research that a child is most likely to be abused by a family member or close relative.

A number of submissions raised concerns about the potential for unreasonable invasions of individual privacy and prejudicial treatment of potential employees or volunteers. Particular concern was raised about the stigma attached to an Interim Negative Notice, which would be sent to employers and potential employers. A submission from the Privacy Commissioner reiterated these concerns and expressed unease about the significant powers conferred on the Departmental Secretary and her delegates in making assessments about the 'risk' posed by individuals. The then Commissioner argued that the scheme should be administered by an independent statutory office.

Following a review of the submissions, a number of amendments were made and the *Working with Children Act 2005* was passed by Parliament on 6 September 2005.

The Act prescribes three kinds of offences that make people potentially unsuitable to work with children. The Secretary must refuse to grant a WWCC Assessment Notice to an applicant with a category one offence, which includes serious sexual crimes against children. Applications are classified as category two if applicants have committed serious drug or violent crimes, such as drug trafficking, manslaughter or intentionally causing serious injury. Category three offences include crimes, such as causing injury recklessly or obscene exposure and any disciplinary findings from a prescribed professional body. In these cases the Secretary of the Department of Justice (DOJ) has discretion about whether to grant a WWCC Assessment Notice after considering individual applications.

The Child Wellbeing and Safety Act 2005 assigns legislative responsibility to the Child Safety Commissioner to annually review and report to the Minister for Children, the Attorney-General and the Secretary, DOJ, on the department's administration of the *Working with Children Act 2005*, including the WWCC.

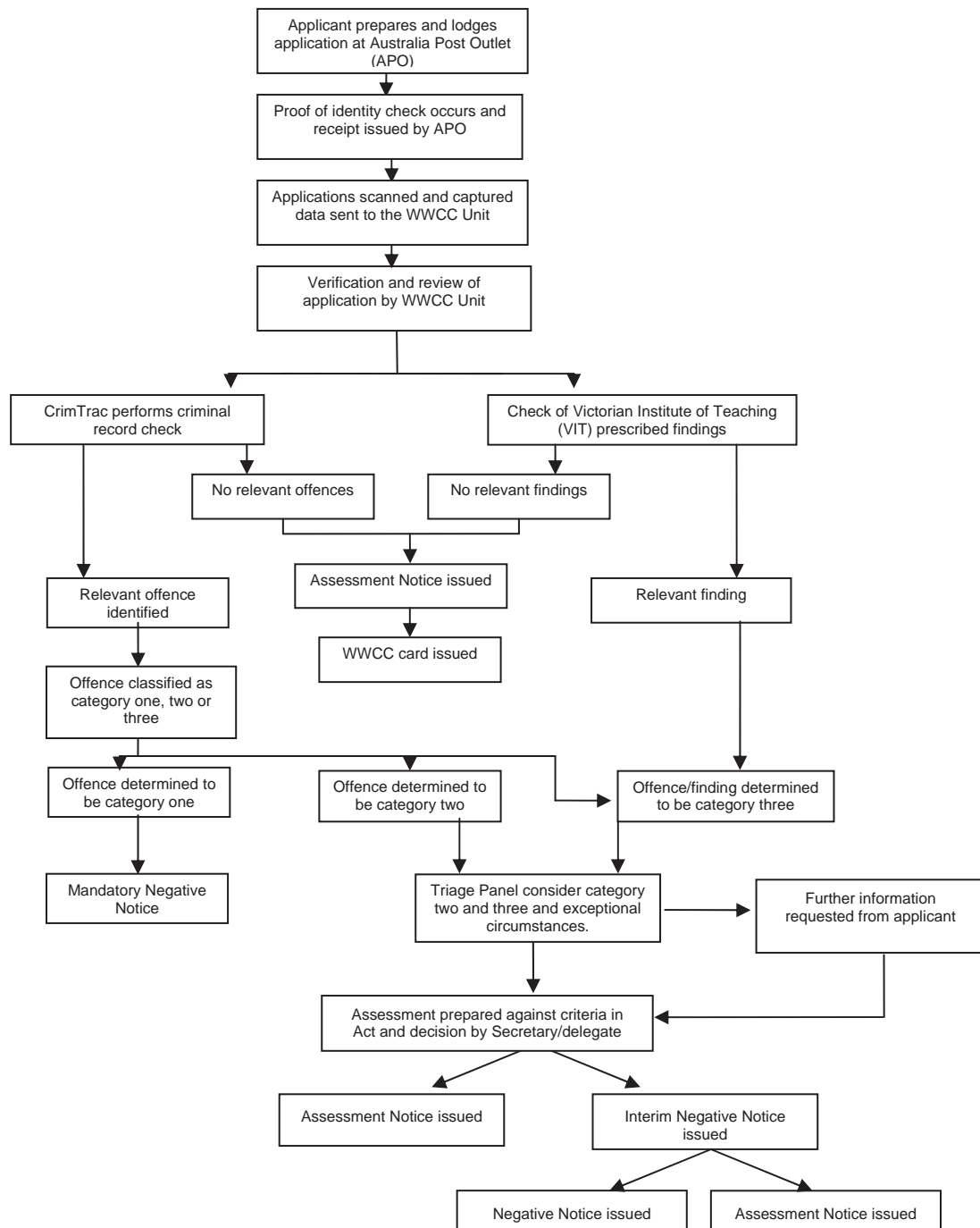
In 2007, the *Working with Children Act 2005* was amended to provide the Secretary with limited 'exceptional circumstances' discretion to consider persons with certain types of criminal histories that do not otherwise fall under categories one, two and three of the Act, but where there may be a significant link between the criminal offences and the risk to the physical and sexual safety of children. Criminal histories could include, for example, an extensive and consistent pattern of violent offences. The amendments also provided for the inclusion of additional offences to be considered relevant in assessing an application.

2.2 The Working with Children Check system

To promote child safety, the Victorian Government has introduced measures to screen and exclude unsuitable people from working with children. The *Working with Children Act 2005* requires all individuals (employers, employees, volunteers and self-employed people) engaged in child-related work as defined by the legislation, to obtain a WWCC if their work involves regular direct contact with a child and when that work is not directly supervised by another person. The WWCC acts as a statewide minimum

assessment of suitability by reviewing a person's criminal history for serious sexual, violence and drug offences. Figure 2A, below, sets out the WWCC application and assessment processes.

Figure 2A
The WWCC application and assessment processes



Source: Victorian Auditor-General's Office.

A description of the process for obtaining a WWCC is detailed in Appendix B.

The WWCC assessment process is managed through the WWCC Unit at DOJ. The WWCC is being phased in over a five-year period from 1 July 2006, with new categories of child-related employment being introduced each year. DOJ estimates that by 2011, approximately 650 000 Victorians who work or volunteer in child-related activities will be subject to a check.

Figure 2B sets out the child-related work categories that have been introduced and the number of applicants who have applied for a WWCC in each category as at 30 June 2008.

Figure 2B
Child-related work categories and application numbers
1 April 2006 to 30 June 2008

Work category	Applications received	Work category	Applications received
Child protection services	2 331	Educational – schools	109 510
Juvenile justice	2 191	Child care services	38 143
Fostering children	1 798	Kindergartens/ preschools	15 009
Community services	13 652	Counselling or other support services	9 769
Coaching/private tuition for children	14 114	Transport services for children	8 023
School crossing services	1 142	Refuges or other residential facilities	2 479
Overnight camps	27 202	Religious organisations	22 084
Commercial children's services	3 888	Babysitting or childminding	2 071
Clubs / associations	35 151	Educational – TAFE, adult education etc.	30 393
Paediatric wards of hospitals	9 702	Other	3 047

Source: Department of Justice.

The total number of applications by work category, noted in Figure 2B, is significantly greater than the total number of WWCC applications received. This is because it is possible for applicants to indicate their intention to undertake child-related work in more than one work category on a single application form.

Each year, nominated child-related work categories will be introduced, consistent with the implementation phasing plan. The phasing plan has been determined on the basis of perceived risk to children. A copy of the implementation phasing plan is provided in Appendix C.

If an applicant has no relevant criminal offences or prescribed findings against them, or it is found that their history is not relevant, they will be issued with a 'WWCC Assessment Notice' and a WWCC Card that will allow them to work or volunteer with children. A WWCC Assessment Notice is not a guarantee that a person is 'safe'. Instead, it is merely a declaration that the person has been assessed and has been judged to be not 'unsuitable' to undertake child-related work.

It remains the responsibility of employers and volunteer organisations to determine whether someone is suitable for their role. The WWCC does not preclude an employer or organisation from applying additional measures to determine whether its volunteers or employees are suitable to work with children or in specific roles.

If an applicant has a relevant criminal history or findings against them, the WWCC Unit may issue a 'Negative Notice', indicating the applicant is unsuitable to work or volunteer with children. In such cases, the applicant is initially sent what is known as an 'Interim Negative Notice' indicating the intention to give a Negative Notice and the reasons for the likely finding. At this stage the applicant can make a submission if they believe they should be issued with a WWCC Assessment Notice.

After the relevant due date, it is a criminal offence for a person without a WWCC Assessment Notice working in any of the child-related work subject to the legislation to work or volunteer to work with children. It is also a criminal offence for an employer or organisation subject to the legislation to engage a person to work or volunteer with children without a WWCC Assessment Notice. It is an offence for a Negative Notice holder to apply for child-related work after receiving the Negative Notice.

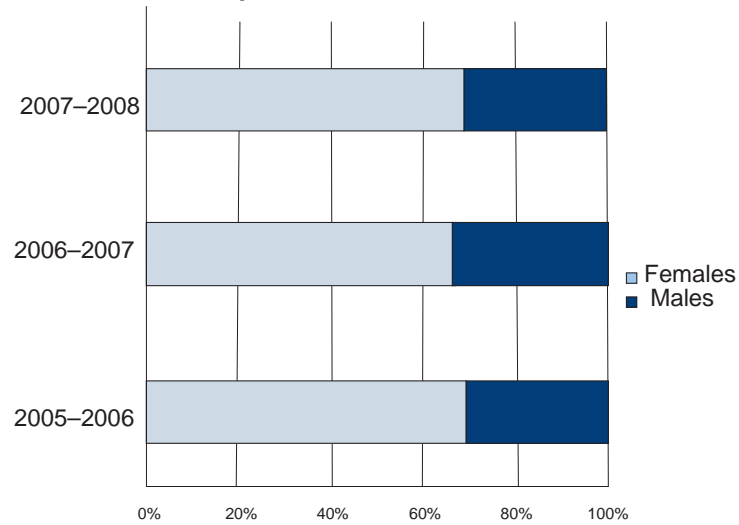
A WWCC card is valid for five years (unless revoked) and is transferable when a cardholder changes their employer or volunteer organisation unless moving from volunteer to paid work. If a person is issued a Negative Notice, they cannot re-apply for a WWCC until five years after the date the Negative Notice is issued (unless there has been a relevant change in circumstances, such as a finding being quashed or set aside).

A small number of individuals are exempt from the WWCC (see Appendix D). A person can make more than one application if they are, for example, moving from working as a volunteer to being an employee. For this reason, the number of applications is more than the number of applicants.

As at 30 June 2008, 304 876 people (313 422 applications) had applied for a WWCC. A total of 286 126 WWCC Assessment Notices have been issued to people who passed the WWCC requirements. Eighty-five applicants were deemed unsuitable for child-related work (less than 0.03 per cent) and received a Negative Notice, with a further 63 currently subject to Interim Negative Notices. Twenty-eight people who received Negative Notices have appealed this decision at the Victorian Civil and Administrative Tribunal (VCAT). Of these, 13 appeals were successful and the applicant was given a WWCC Assessment Notice. Six appeals were unsuccessful.

A further nine appellants lodged an appeal with VCAT, which was yet to be resolved as at 30 June 2008. While approximately 70 per cent of all WWCC applicants are female, as demonstrated in Figure 2C, below, just six of the applicants (7 per cent) who received a Negative Notice are women (one of these is currently subject to an appeal to VCAT).

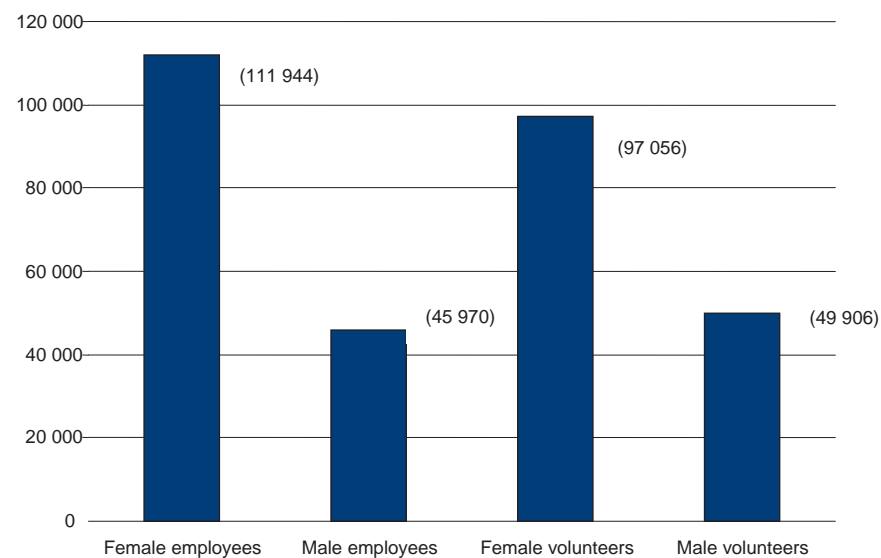
Figure 2C
Percentage of male and female WWCC applicants
1 April 2006 to 30 June 2008



Source: Department of Justice.

As shown in Figure 2D, 157 914 people who lodged an application between 1 April 2006 and 30 June 2008 were employees undertaking child-related work, while 146 962 were volunteering in child-related activities.

Figure 2D
WWCC applicants by gender 1 April 2006 to 30 June 2008



Source: Department of Justice.

2.3 Audit methodology

The audit involved a review of relevant DOJ data, internal processes and procedures. It also involved interviewing key staff of DOJ.

The audit reviewed a risk-based sample of 72 WWCC applications as described in Appendix E.

The audit was performed in accordance with the Australian Auditing Standards applicable to performance audits, and included tests and procedures sufficient to enable audit conclusions to be reached.

The total cost of the audit was \$287 000. This includes staff time, overheads, expert advice and printing.

3 Implementation of the Working with Children Check

At a glance

Background

The *Working with Children Act 2005* was passed by the Victorian Parliament on 6 September 2005. The Department of Justice (DOJ), which is responsible for administering the scheme, then commenced planning and developed an implementation plan, established a risk management process and consulted with stakeholders and the community to assist in the rollout of the scheme. Following a three-month trial, the scheme officially commenced on 1 July 2006, with child-related work categories being phased in over a five-year period.

Key findings

DOJ demonstrated a clear and comprehensive approach to the implementation of the WWCC, establishing all key components of the project on schedule. We found that:

- DOJ developed a detailed implementation plan that identified the key elements of project management, including milestones, resource allocation, oversight arrangements, quality assurance and evaluation
- major risks were identified and monitored through a risk register, and senior management maintained oversight throughout the process, establishing clear accountabilities
- the implementation process was closely monitored and reviewed for progress
- stakeholder input was sought throughout the implementation process and a communication strategy was developed that appropriately targeted relevant client groups.

We identified scope for DOJ to extend the WWCC card renewal period, based on the effectiveness of the ongoing monitoring arrangements in place with Victoria Police.

Key recommendation

- Subject to cost-benefit and risk assessments, DOJ should consider extending the period for which WWCC cards are valid. **(Recommendation 3.1)**

3.1 Implementation of the Working with Children Check

3.1.1 Introduction

To determine whether the WWCC had been implemented effectively, we sought to establish whether:

- input from the community had been considered in the planning of the WWCC implementation
- DOJ had a comprehensive implementation plan that targeted the rollout of the WWCC to the areas of greatest risk/need
- child-related work categories requiring the WWCC were introduced based on an assessment of perceived risk to the community
- implementation milestones and timelines were established, monitored and met, and corrective action taken when necessary.

3.2 Community input and consultation

DOJ consulted with stakeholders and the community during the drafting of the *Working with Children Act 2005* and throughout the WWCC implementation process. Feedback from these processes indicated a high level of support for the introduction of the WWCC. As a result of the consultation process, key aspects of the legislation and WWCC process were reviewed. Consultation measures included:

- discussion papers, canvassing the views of stakeholders and the broader public on how the scheme should operate. More than 160 submissions on the *Working with Children Bill 2005* were received
- focus groups to gauge community views and understanding of the WWCC
- briefings and information sessions held for those occupational groups involved in the implementation trial period. Some adjustments were made to implementation time frames based on this process. Information sessions were also arranged for culturally and linguistically diverse (CALD) and Indigenous communities
- the establishment of a dedicated WWCC information line to respond to general queries from WWCC applicants and stakeholders about the WWCC. Feedback received through the information line has led to changes in the content and usability of the WWCC website
- the establishment of an interdepartmental working group to consider issues for government entities affected by the proposed WWCC scheme.

3.3 Implementation plan

In examining the WWCC implementation plan we assessed whether:

- a comprehensive implementation plan was in place prior to the commencement of the WWCC
- the implementation plan addressed the key elements of project management including key activities, milestones, timelines and task allocation
- implementation risks were identified and strategies developed to reduce or mitigate those risks
- a detailed communications plan was in place prior to implementation of the WWCC.

DOJ's WWCC Unit developed a status monitoring report in 2005, which contained many of the required elements of a project plan and effectively served as the WWCC implementation plan. The department also established a risk management policy and risk register, a communications plan and a community information and education strategy. Combined, these documents provided an effective strategic framework to guide the implementation of the WWCC.

The status monitoring report set out the key activities required to implement the WWCC and specified key tasks, commencement and completion dates, and tracked rates of progress against milestones. Despite the short lead time (nine months) the WWCC Unit was able to guide the implementation of the WWCC on schedule.

The WWCC Unit developed a risk management plan in June 2006 to identify risks and associated mitigation strategies. This has since been superseded by the department's risk management plan. The WWCC Unit also maintains a risk register which records risks to the business unit in an ongoing capacity.

A communication strategy focusing on the period between January and December 2006, which encompassed the trial period, commencement date and introduction of first work categories under the WWCC implementation phasing plan, was prepared.

The strategy involved:

- direct mail, briefings and information sessions to key industry groups
- the establishment of the WWCC information line and website
- information packs, brochures and fact sheets for various organisations and child-related work sectors
- the engagement of consultants to devise an advertising strategy involving print, radio and online media.

The communication strategy also sought to raise overall community awareness about the WWCC. An evaluation of the strategy undertaken in late 2007 found:

- community awareness levels of the WWCC were commensurate with levels of advertising
- steadily growing community agreement with the WWCC introduction
- a 10 per cent increase in the number of respondents surveyed who had applied for a WWCC, or believed they would be required to apply for a WWCC.

Card renewal

A WWCC card is valid for five years unless a relevant change in circumstances results in a revocation before the expiry date. In view of the effective ongoing monitoring arrangements in place with Victoria Police, which identify a relevant change in a cardholder's criminal history, the risk of failing to detect a change in a cardholder's suitability to work with children is low. There is a case for DOJ to consider extending the card renewal period. By extending the period for a card to remain valid, potential savings in administrative costs may be realised, with minimal or no additional risk.

3.4 Introduction of child-related work categories

The implementation phasing plan sets out which child-related work categories will be introduced over the five-year implementation period. We examined the phasing plan to determine if child-related work categories were introduced on the basis of perceived risk to children.

We found the phasing plan was drafted in accordance with a set of guiding principles based on minimising harm to children. Child-related work categories were divided into two priority groups. Stage one included years one and two of the phasing plan and comprised those occupations where the prime focus was to work directly with children or where services were provided to vulnerable or 'at risk' children. Categories considered to present a lower risk were introduced in stage two, comprising years three through five of implementation.

The WWCC phasing plan is also similar to checking schemes introduced in other jurisdictions, where occupations considered 'high risk', such as foster carers, have been prioritised for implementation.

3.5 Milestones and timelines

In assessing whether timelines and milestones for the implementation of the WWCC were monitored, we found that:

- there was an established process for monitoring and reviewing progress on key implementation deliverables
- senior management was kept informed of progress made against the implementation plan
- corrective action was taken where necessary.

DOJ established sound processes for the monitoring and review of progress on key deliverables. Timelines and milestones for the implementation of the WWCC were clearly set out in the status monitoring report, which documented commencement and completion dates, duration and current progress rates for individual tasks.

The WWCC status monitoring report was reviewed by senior management within the WWCC Unit on a weekly basis. This process was supported by the Implementation Steering Committee and Interdepartmental Implementation Committee, who maintained oversight of the implementation process. Committee members were provided with monthly implementation progress reports to assist in the oversight function.

Due to the short time frames, DOJ were forced to expedite elements of the implementation program to meet the scheme's start date. Despite this, the WWCC scheme was fully operational by the official commencement date of 1 July 2006.

WWCC Unit management has demonstrated a willingness to take action to amend policies and processes, as required throughout the implementation process. Scrutiny by the WWCC Unit and DOJ executive management in the assessment of applications has also led to further legislative amendments.

In 2007 the *Working with Children Act 2005* was amended to provide the Secretary with limited 'exceptional circumstances' discretion. This occurred because in the scheme's first year of operation the department considered persons with certain types of criminal histories, which fell outside categories one, two and three should also be assessed as to determine whether they posed an unjustifiable risk to children.

3.6 Conclusion

DOJ demonstrated a clear and comprehensive approach to the implementation of the WWCC, establishing all key components of the project to schedule and within allotted timelines. We found that:

- DOJ developed a detailed implementation plan that identified key elements of project management, including milestones, resource allocation, oversight arrangements, quality assurance and evaluation
- major risks were identified and monitored through a risk register and senior management maintained oversight throughout the process, establishing clear accountabilities
- the implementation process was closely monitored and reviewed for progress
- stakeholder input was sought throughout the implementation process and a communication strategy was developed that appropriately targeted relevant client groups.

We identified scope for DOJ to extend the WWCC card renewal period, based on the effectiveness of the ongoing monitoring arrangements in place with Victoria Police.

Recommendation

- 3.1 Subject to cost-benefit and risk assessments, DOJ should consider extending the period for which WWCC cards are valid.

RESPONSE provided by the Secretary Department of Justice

Recommendation 3.1 – Implementation of the Working with Children Check — this recommendation is supported in principle.

Currently a Victorian Working with Children Check is valid for five years unless revoked. It is noted by the department that in comparison to both the Queensland and Western Australian Working with Children schemes, Victoria currently has the longest validity period compared to the other schemes which require applicants to re-apply in two and three years respectively.

As noted in the report, the feasibility of this recommendation is yet to be assessed. However, the department is keen to explore opportunities which reduce the administrative cost of the Working with Children Check. Consequently, the department will consider the cost-effectiveness and risk impact of extending the validity of the card. At the outset of the Working with Children Check, the Attorney General committed to a review of the legislation following three years of operation. The department in its review of the legislation which is scheduled to commence in 2009 will consider this recommendation.

4 Quality assurance

At a glance

Background

The sensitive nature of the service provided by the WWCC Unit requires an effective quality assurance framework. Key aspects of the quality assurance framework should seek to:

- identify individuals who are not suitable to work with children
- ensure that a WWCC card is not accidentally issued to ineligible applicants
- protect applicants' privacy.

Key findings

- The WWCC Unit has a comprehensive quality assurance framework that provides appropriate controls over the application and assessment processes
- DOJ has a formal Triage Panel that confirms relevant offences and determines if additional information is required to enable the applicant to be assessed against the factors in the Act, which must be taken into account for applications with relevant offences. However, the process lacks a formalised systematic approach to determining when further information is required and documentation of the reasons for arriving at these decisions.

Key recommendation

DOJ should:

- ensure that reasons for decisions made during the Triage process are comprehensively documented on Triage Action Cover Sheets (TACS) and applicant files
- establish pre-assessment guidance for Triage that ranks or filters WWCC applications using risk-based criteria
- where the Secretary has discretion, enable an applicant receiving an Interim Negative Notice to request an internal review by a suitably qualified independent person. **(Recommendation 4.1).**

4.1 Quality assurance framework

4.1.1 Introduction

It is important that agencies, such as the Working with Children Check (WWCC) Unit have a good quality assurance framework that clearly specifies requirements and guidance to make sure that operational processes comply with quality and risk management standards. This framework should include a monitoring and review process that both facilitates continual improvement of internal capabilities and identifies areas for improvement in policies, procedures and processes. It is also important that such a framework should provide staff with appropriate guidance, training and support to enable them to effectively discharge their roles and responsibilities.

The sensitive nature of the service provided by the WWCC Unit necessitates an effective quality assurance framework. Key elements of the quality assurance framework should:

- identify individuals who are not suitable to work with children, as prescribed by the *Working with Children Act 2005*
- ensure that a WWCC card is not accidentally issued to ineligible applicants
- protect applicants' privacy.

In addition to these key elements, the audit also examined whether the WWCC Unit has a quality assurance framework that ensures its operational and procedural risks are mitigated and appropriate standards of performance are achieved.

4.1.2 Quality assurance framework

In assessing the adequacy of the WWCC system, we examined whether there was:

- a risk management plan that identifies key strategic and operational risks and mitigation strategies, is regularly reviewed, with results reported and acted on
- an internal audit function and external review of WWCC operations
- appropriate guidance, training and support given to operational staff
- a continuous improvement process related to WWCC application and assessment processes.

Risk management plan

The WWCC Unit has developed a detailed quality plan that describes quality operational standards that are designed to ensure that WWCC Unit outcomes are met. Monitoring against the approved quality plan is reported to DOJ management.

A critical component of the WWCC Unit's quality plan is a risk register that:

- identifies risks and potential events that could affect strategic and business objectives

- analyses the significance of risks by determining the likelihood and consequences of each event occurring
- prioritises risks based on significance and their level of acceptability
- assigns responsibility for risk identification and control to internal staff and contractors
- identifies mitigation strategies that have been developed for unacceptable risks through the evaluation of current controls and treatments.

The risk register is currently reviewed by management on a quarterly basis, but it is proposed that the register be reviewed every six months.

4.1.3 Application of quality assurance processes

The WWCC Unit has a dedicated quality assurance manager, who is responsible for the development and review of the Unit's quality assurance processes. The audit examined the Unit's quality assurance processes and identified a data verification process, business rules, internal audits, tracking of applications, and the conduct of external reviews of the Unit's operations.

Data verification

The WWCC Unit implemented a data verification process in 2006 to assess and validate the accuracy of each applicant's data and proof of identity, which is lodged with Australia Post. The robustness of the verification process is critical for establishing the correct identity of a person applying for a card and making sure that the issue of appropriate WWCC Assessment Notices of an individual's suitability reach the right person. Applications are verified at different stages during the processing cycle by the verification team, Australia Post and Decipha (the Australia Post subsidiary that electronically scans applications).

To monitor the effectiveness of the data verification process, the WWCC Unit conducts daily, monthly and quarterly audits. The results of these audits have demonstrated an accuracy rate consistently exceeding 99 per cent. In addition, verification by contractors is monitored in KPI reports and on-site audits.

Business rules

To support the data verification process, DOJ developed business rules for compliance with criteria around the applicant's name, address, proof of identity and photographs, and this is used by the verification team, Australia Post and Decipha. If discrepancies are identified they are addressed by the WWCC Unit or they are referred back to Australia Post.

In addition to data verification, the WWCC Unit undertakes monthly quality audits that test a random sample of 50 WWCC applications for accuracy, completeness and compliance with business rules. These audits have consistently shown a high rate of compliance with the Unit's business rules.

Internal audits

The WWCC Unit conducts a number of regular audits, including data quality, privacy and confidentiality, contractor security and critical processes.

Audit reports are provided to management and VAGO found evidence that action is taken to correct errors and, in the case of data quality audits, feedback is given to individual staff as part of ongoing training.

The unit also undertakes regular audits of the *ChildCheck* database, including monitoring of general access and staff record access.

The WWCC Unit recently conducted an audit of the review and assessment process to identify areas for improvement.

Application tracking process

In 2006, the WWCC Unit implemented a process that conveys details of applications that each Australia Post outlet collects via electronic point of sale (EPOS) to the WWCC Unit daily. This data contains information on the applicant's name and phone number, the application fee paid, and the Australia Post outlet, and links with the application in the *ChildCheck* database. This process enables the WWCC Unit to track applications to avoid loss or delay in processing applications. Any applications that are unaccounted for are investigated by a dedicated officer in the WWCC Unit.

External reviews

The WWCC application and assessment processes have been the subject of a number of external audits and reviews including:

- an audit of the WWCC Unit in August 2006 by DOJ internal auditors
- annual compliance reviews undertaken by the Child Safety Commissioner under *The Child Wellbeing and Safety Act 2005*. The reviews have noted scope for improving the documentation of policies and procedures (2006) on which considerable progress has since been made, and a minimal number of improvements to process design in 2007
- an annual audit by CrimTrac to provide assurance that the procedures for handling criminal history information are in accordance with the contract between CrimTrac and DOJ. In 2007 a satisfactory level of compliance with procedures was reported
- a professional services firm commissioned by DOJ in 2007 to provide independent advice on risk assessment, and improvements to existing processes and systems, which provided recommendations, such as improvements to the Triage process and a review of the WWCC Unit's quality plan.

4.2 VAGO file review

As part of assessing the WWCC Unit's operational processes and quality assurance measures, we conducted a risk-based review of 72 finalised WWCC application files (from 2006 to 2008), checking for accuracy, completeness and compliance with WWCC procedures and business rules. The audit criteria and sample selection for the review was targeted to areas of greatest risk and was not a full compliance audit. The file review criteria and process are described in Appendix E.

'Clears' files

Application files with no criminal history are referred to as 'clears' and result in an automatic approval of the applicant's suitability to work with children. More than half (15) of the 24 'clears' files reviewed complied with all of the criteria.

In nine of the applications the issues identified were minor and generally resulted in only partial non-compliance of the audit criteria. The issues were mainly:

- minor errors, such as a spelling error in the street name
- scanning errors, where dates and/or names were illegible.

'Relevant offence' files

Relevant offence files are considered by the case management team, comprising review and assessment, legal, the Unit Director, the Executive Director and the Secretary to the Department of Justice. Through this process the Secretary to the DOJ (or delegate) determines whether to exercise her discretion under the *Working with Children Act 2005* to grant a WWCC Assessment Notice to an applicant with a relevant criminal history, consistent with a category two or category three offence, as prescribed under the Act. Applications with findings of a prescribed kind by a prescribed body are also considered at Triage.

At the initial assessment stage the Triage Panel confirms the relevant offence and whether additional information is required to assess whether the applicant poses a potential risk to the safety of children. Where additional information is not required Triage recommends the preparation of the application assessment briefing. The briefing assesses the relevant offences against the factors nominated in the Act, for determination by the Secretary (or delegate) as to the issue of an Assessment Notice or Interim Negative Notice.

Where additional information is required the Triage panel identifies the source, including the applicant, the employer / volunteer organisation, or other sources, such as Corrections Victoria, courts, and Victoria Police.

The file review showed that records were appropriately maintained. The main issues identified related to procedural non-compliance with the maintenance of Triage Action Cover Sheets (TACS), specifically:

- the absence of TACS in the applicant files
- incomplete TACS, such as an absence of clearly documented recommendations by the Triage Panel and approval signatures.

We identified that the TACS were incomplete in 50 per cent of the 16 category two and three application files reviewed, and both of the applications with findings of a prescribed kind.

Documents and copies of correspondence were missing in nine of the 72 files. Scanned copies of these documents were filed in the WWCC Unit's *ChildCheck* database, and the requirement to file hard copies in the applicant files had not been followed in these instances.

In a recent internal audit of the review and assessment process, the WWCC Unit found similar issues to those identified by the VAGO file review, including missing documentation and incomplete TACS. The WWCC Unit is taking steps to improve quality control in the maintenance of applicant files and general record keeping by conducting a review of all files to correct any issues, implementing monthly audits of files and establishing performance benchmarks for this process.

4.3 Actions taken to support continuous improvement

Improvements have been progressively made to the WWCC Unit's systems and processes since its inception. Improvements to the *ChildCheck* database have been designed and implemented by the WWCC Unit's dedicated in-house IT team.

Application process

In November 2008 Australia Post will implement a new system called *ID Wizard*, which aims to increase the accuracy of proof of identify information and the efficiency of the verification process. Under this process, when a WWCC applicant lodges their form at Australia Post, this information will be entered directly into the electronic point of sale (EPOS) system and transmitted electronically to Decipha.

Verification process

The WWCC Unit verifies the accuracy and completeness of scanned applications and electronic data exported to the *ChildCheck* database from Australia Post and Decipha. By the end of 2006, the WWCC Unit introduced the 'verification log' system to the database, which is designed to improve data quality and automate manual handling processes. Greater efficiencies have been achieved through the introduction of the verification log, including the provision of prompts to operators to ensure that the

critical components of the application, such as proof of identity, photographs and signatures, are correct.

Review and assessment process

More complex files for applicants with a relevant criminal history are required to go through the WWCC Unit's review and assessment process. These systems and procedures, underpinning the review and assessment process, have changed significantly since 2006. Recent improvements include updating of the procedures and the introduction of a closed file checklist, which have been designed to improve record keeping.

The WWCC Unit is also in the process of outsourcing the printing and dispatch of WWCC Assessment Notices to the incumbent card manufacturer. Consolidating these functions with the card manufacturer contractor should result in savings on administrative costs for the WWCC.

Triage process

There are four possible outcomes from the Triage process. These are:

- a request for further information from the applicant (issue of a section 11 letter)
- a request for further information from the employer about their views on the applicant's suitability to work with children (issue of a section 11 letter)
- the preparation of an application assessment briefing recommending a WWCC Assessment Notice, that is the issue of a working with children card
- the preparation of an application assessment briefing recommending an Interim Negative Notice.

Under the current Triage process, each of the panel members indicates their recommendation by signing in the relevant action box on the TACS, which contributes to an overall recommendation for further action that is signed off by the Director of the WWCC Unit, with the final determination made by the Executive Director Community Operations and Strategy.

The department advised that these determinations are reached by measuring the information available against the factors in the Act which must be taken into account for applicants with relevant offences.

Notwithstanding this, the audit found that this process lacked a standardised documented approach to decision-making. There was no evidence of a formalised systematic assessment of applications against specific criteria to determine an applicant's potential risk to the safety of children and an absence of documentation clearly recording how decisions to seek additional information had been determined.

To improve this process, we recommend that the WWCC Unit establishes pre-assessment guidance that incorporates a rating or filtering system that groups applications as low, medium and high risk. This rating should be recorded on the TACS, and the criteria for consideration during the Triage process should be specified. This approach, together with the adequate documentation of relevant facts would provide a more robust approach to the decision-making process by Triage to seek additional information to assess the application.

Interim Negative Notices and appeals

When applicants are assessed by the Secretary (or delegate) through the Triage process as posing an unjustifiable risk to the safety of children, they are issued with an Interim Negative Notice. These applicants can provide additional information in support of their application. This is subsequently considered by the Secretary (or delegate) and a decision is made either to issue a WWCC Assessment Notice, enabling the applicant to work with children, or to issue a Negative Notice, where the applicant has the right to appeal the decision at VCAT.

The legislation prescribes criteria against which applications from people with relevant offences are assessed to determine if they pose an unjustifiable risk to the safety of children. The 10 criteria include the length of time since the crime was committed, the age of the offender and the victim at the time of the offence and the applicant's behaviour since the crime was committed. Since these criteria require interpretation by those assessing the application, there is a risk that decisions will be influenced by the personal values and concerns of panel members.

The decision to issue an Interim Negative Notice potentially affects people's rights and their employment prospects. Accordingly, there should be an opportunity for applicants receiving an Interim Negative Notice to request an internal review of the decision to be undertaken by DOJ, before the issuing of a Negative Notice. This is limited to those circumstances where the Secretary has discretion. The proposed internal review process could involve a further assessment of the application against the legislative criteria.

This is consistent with the principles of administrative law in other legislation, such as Freedom of Information, which provides for an internal review of decisions. Similarly other occupational licensing legislation (*Health Professions Registration Act 2005*) provides the capacity for licensing decisions to be reviewed internally before being referred to VCAT. At a minimum, these internal reviews should be undertaken by a person or persons separate from those making the original assessment and with the requisite expertise, independent of the WWCC Unit.

Introducing a capacity for internal review may lead to delays in finalising the WWCC process; however, this must be weighed against the imperatives of natural justice. Although applicants have the right to appeal to VCAT after the issue of a Negative Notice, many people are reluctant to embark on proceedings through the court system.

Section 11 letters and requests for further applicant information

At Triage it is common for a recommendation to be made to issue a letter, under Section 11 of the Act, requesting further information from the applicant. The letter may also be sent to an applicant's employer/volunteer organisation requesting information about the applicant's suitability for child-related work. Although section 11 letters do not provide any details about the applicant's criminal record to the employer/volunteer organisation, these may cause employers/volunteer organisations to query why further information is being requested.

The WWCC Unit has not developed guidelines about when section 11 letters should be sent and to whom they should be sent. These should be developed and linked to the rating system that we have proposed to guide the Triage process.

Staff training

The audit examined whether guidance, training and support provided to WWCC Unit staff were appropriate to enable them to effectively perform their roles. We found that DOJ has a range of training activities to assist staff to undertake their roles, including:

- individual and group training sessions and on-the-job training
- observing and working alongside experienced staff
- ongoing training and feedback from team leaders.

Conclusion

DOJ has established a comprehensive quality assurance framework that provides an appropriate level of control and review over WWCC application and assessment processes. We found that there was:

- a detailed quality plan and risk register to identify and mitigate risks and set standards for managing the quality of service delivery
- a comprehensive data verification process with internal audits and external reviews
- a continuous improvement approach to the development and enhancement of operational systems and processes
- appropriate guidance, training and support for staff.

However, the audit identified areas for improvement, particularly in relation to the review and assessment process and the need to record the reasons for decisions on the Triage Action Cover Sheets (TACS). In relation to the Triage Panel process, current operational procedures would be improved by:

- establishing formal risk guidelines to inform the process of determining when section 11 requests to applicants for further information should be issued
- ensuring the reasons for decisions are recorded on the TACS.

In relation to the review and assessment process, where the Secretary has exercised discretion to issue an Interim Negative Notice, a process for applicants to request an internal review of the decision prior to the issue of a Negative Notice should be established.

Recommendation

4.1 DOJ should:

- ensure that reasons for decisions made during the Triage process are comprehensively documented on Triage Action Cover Sheets (TACS) and applicant files
- establish pre-assessment guidance for Triage that ranks or filters WWCC applications using risk-based criteria
- where the Secretary has discretion, enable an applicant receiving an Interim Negative Notice to request an internal review by a suitably qualified independent person.

RESPONSE provided by the Secretary Department of Justice

Recommendation 4.1 – Quality Assurance – these recommendations are partially supported.

The department is cognisant of the need to have a robust system of assessing the applications of those who have a relevant offence in light of the potential risk that they may pose to children. As a result, a Triage process was established with representatives from senior management. Triage is at the preliminary stage of the assessment of the application and as such, it plays a critical role in ensuring correct categorisation against the Working with Children Act 2005 and importantly, identifying whether further information is required in order to adequately assess risk.

It is critical that the department has adequate information about applicants in order to undertake careful assessments about the risk an applicant may pose. The role of Triage is to ensure that the decision-maker is adequately informed when making the final decision to grant or refuse a Working with Children Check. Once all required and necessary information nominated by Triage has been provided, a complete assessment against the factors, necessary under the Working with Children Act 2005, is undertaken.

This assessment against the factors, which supports the application outcome that is either an Assessment Notice or Negative Notice (via an Interim Negative Notice), is contained in the Application Assessment Briefing. This briefing, which addresses the required factors against the information collected, is provided to the Secretary to the Department of Justice or her delegate (Executive Director or Director) for consideration. This is a formalised, systematic and documented process, which ensures that when arriving at their decisions, the Secretary or delegate takes into account the information against the factors listed in the Act.

RESPONSE provided by the Secretary Department of Justice – continued

The department accepts the recommendation regarding the establishment of formal risk guidelines as to when section 11 letters should be sent. Further, the department accepts the recommendation that the function of the Triage Action Cover Sheets be expanded to record the reason for arriving at decisions. As noted in the report the Department is currently reviewing processes relating to Review and Assessment for opportunities to improvements. These recommendations will assist this process.

The department will further consider the recommendation that it establish a process for where the Secretary has discretion, to enable an applicant receiving an Interim Negative Notice to request an internal review by a suitably qualified independent person. Applicants under the existing legislation who have received a Negative Notice may appeal the outcome to the Victorian Civil and Administrative Tribunal. Notwithstanding the importance of opportunities to enhance natural justice provisions in the legislation, the department is concerned that in some cases, additional delay to the final assessment process could have a negative impact on the safety of children, given that applicants who have been issued an Interim Negative Notice can continue to engage in child-related work pending a final outcome. The department welcomes the opportunity to further consider this recommendation as part of the review of the legislation which will commence in 2009. Review at this point will enable the opportunity to undertake an in-depth analysis of likely benefits against the associated delay.

5 Efficiency and effectiveness of the Working with Children Check system

At a glance

Background

We reviewed The Department of Justice's (DOJ) systems to monitor and report the costs and key processes associated with the operations of the Working with Children Check (WWCC) system. We also sought to determine whether DOJ could assess the effectiveness of the WWCC system against clearly defined objectives and outcomes.

Key findings

The WWCC system has processes in place that enable appropriate monitoring, management and reporting. Management information provided through the WWCC Unit's monthly activity report covers a range of operational and financial issues but could be improved through the:

- inclusion of narrative information that explains the drivers of the system's actual operating costs
- inclusion of the full suite of contractors' performance measures
- refinement of benchmark targets to assess internal operational performance.

DOJ should also build on the information it has collected and reported through its monthly activities reports on the operations of the WWCC Unit and continue to develop performance measures and associated benchmark targets that will more adequately enable it to report on the economy and efficiency of its operations.

In addition to this, DOJ should be developing performance measures that link to the effectiveness of the WWCC scheme and demonstrate whether the objectives and expected outcomes of the scheme are being achieved over time.

Key recommendation

- DOJ should develop performance measures that demonstrate the achievement of the objectives and expected outcomes of the WWCC scheme.

(Recommendation 5.1)

5.1 Operating cost of WWCC Unit

To determine if DOJ had systems that enabled the monitoring, management and reporting of the costs and key processes involved with the operations of the WWCC system, we examined whether:

- operating costs of the WWCC system and unit costs of key processes are monitored, controlled and reported
- there are mechanisms in place to ensure that the components of the WWCC assessment process delivered by external contractors represent value for money
- the WWCC Unit's performance is monitored and reported.

5.1.1 Operating costs

The cost of the operations of the WWCC Unit for the period 2005–06 to 2007–08 is shown in Figure 5A.

Figure 5A
The cost of operations for the WWCC Unit
(\$ 000)

Year	ERC funding	Carry forward	Total appropriation	DOJ reallocation ^(a)	Actual operational cost	Surplus
2005–06	8 654	-	8 654	-376	3 278	5 000
2006–07	9 943	5 000	14 943	-3 955	7 788	3 200
2007–08	10 171	3 200	13 371	3 295	16 666	-
Total	28 768	8 200	36 968	-1 036	27 732	-

(a) Internal reallocation of appropriated funds by DOJ.

Source: All financial information is provided by DOJ and is unaudited.

Figure 5A shows that there was a significant carryover position in the first three years of the operation of the WWCC Unit, indicating an inability to spend total annual appropriations. The high level of carryover of funds in 2005–06 and 2006–07 was anticipated by DOJ due to the WWCC not commencing until mid-2006. This resulted in the internal reallocation of appropriated funds between other programs administered by DOJ. By 2007–08 all carryover funding was exhausted, which was in part due to the increase in demand for WWCC and the government's decision not to charge a fee for the cost of volunteer WWCCs.

The WWCC Unit's monthly activity report provided to management shows the WWCC Unit's operating costs. No explanation or analysis is provided regarding the actual current year costs and their performance against the budget target. The information provided in this section of the report could be improved by explaining the reasons for actual operational expenditure and the principal drivers of the WWCC Unit's costs. Variations from the budget estimate should be presented similarly. While this is not reported in the WWCC monthly activity report, commentary on the WWCC Unit's performance is contained within other DOJ monthly performance reports.

5.1.2 Community demand

Demand projections

For the years 2008–09, 2009–10 and 2010–11, DOJ has estimated WWCC application volumes and the associated cost of operations as shown in Figure 5B.

Figure 5B
WWCC application volumes and cost estimates

	2008–09	2009–10	2010–11
Estimated application volumes (Number) (a)	139 781	117 395	94 000
Estimated operating cost (\$ '000)	14 878.0	13 934.0	13 548.0

(a) Estimates of application volumes and operating costs will be subject to external review.

Source: All financial information is provided by DOJ and is unaudited.

Monitoring demand

Community support for the WWCC is evident from the high number of applications for the WWCC. Data provided by the department showed that since the scheme was introduced applications were double the number forecast and for 2007–08 applications received were around three times the number forecast for the period. The much greater than expected number of volunteers applying for the WWCC is a major demand driver.

The WWCC Unit's Demand Management Committee meets fortnightly to monitor and review applications lodged against the relevant occupational categories to ensure that annual lodgement obligations under the five-year phasing plan are met. Other components of the demand management strategy include:

- recruitment of temporary staff as required to manage high-volume periods
- the provision of information sessions targeting high-priority groups
- targeted communications (e.g. direct mail) are used to raise awareness of the phasing schedule and obligations with relevant groups.

In addition, the WWCC Unit's monthly activity report provides data on the number of WWCC applications received against the forecast targets. The report also provides analysis of the impact monthly applications have on the operational practices of WWCC Unit, the number and type of investigations undertaken and application processing times.

5.1.3 Key contractual arrangements

Contractual costs

The main contractual arrangements involved in the delivery of the WWCC are:

- application processing by Australia Post
- criminal record checks by CrimTrac (Commonwealth Government agency)
- the issue of WWCC cards by a private provider.

The cost of these services is shown in Figure 5C.

Figure 5C
Costs of main contractual arrangements
(\$ 000)

Contract	Actual costs		Estimated costs		
	2006–07	2007–08 ^(a)	2008–09	2009–10	2010–11
Australia Post	1 829.9	6 910.8	3 142.0	2 718.0	2 242.0
CrimTrac	832.4	3 052.1	928.0	828.0	677.0
WWCC card issue (private provider)	109.9	405.1	259.0	217.0	174.0

(a) Payments are to May 2008.

Source: All financial information is provided by DOJ and is unaudited.

The WWCC Unit's monthly activity reports show the costs of application processing undertaken by Australia Post and the cost of CrimTrac checks of applicants' criminal histories; however, no information is provided on the cost of issued WWCC cards. The information provided is limited to total contractor costs. The usefulness of this information would be improved by providing reasons for actual expenditure and any variations from budget targets.

Contractor performance

Notwithstanding that specific contractual performance measures for Australia Post are monitored by the WWCC Unit, most information provided on contractor performance in the WWCC Unit's monthly activity report relates to the elapsed time for the lodgement of applications with the WWCC Unit, time taken to conduct criminal checks and the time taken to issue WWCC cards.

This information would better reflect contractor performance through the inclusion in the monthly report of:

- benchmark targets for each contractor, comparing these against their actual monthly performance and explaining any variations
- a comparison of actual contractor performance against established contractual measures and explaining any variations.

Conclusion

The WWCC system has processes that enable monitoring, management and reporting of the system's key operational costs and processes. Management information provided through the WWCC Unit's monthly activity report covers a range of operational and financial issues but could be improved through the inclusion of:

- narrative information that explains the drivers of the system's actual operating costs and any variations from budget
- benchmark targets to assess contractor and internal operational performance.

5.2 Effectiveness of the WWCC system

We set out to determine whether DOJ could assess the effectiveness of the WWCC system against clearly defined outcomes. To do so, we examined whether:

- the objectives and expected outcomes of the WWCC system were clearly defined
- performance measures and targets were measurable and logically linked to the system's objectives and outcomes
- data was collected
- performance data was analysed
- data on performance was used to improve the design and administration of the WWCC program.

5.2.1 Program objective and output measures

The main purpose of the Act is to assist in protecting children from sexual or physical harm by ensuring that people who work with, or care for, them have their suitability to do so checked by an appropriate body.

Consistent with State Government Budget requirements, DOJ has developed output measures of performance for the WWCC system, which are included in *Budget Paper No. 3, Service Delivery*.

The output measures for the WWCC are contained within the *Community Safety and Crime Prevention* output group and include:

- Quantity measure—number of WWCCs processed
- Quality measure—issuing of WWCC assessments in accordance with the WWCC Act 2005
- Timeliness measure—timely commencement of occupational phasing for WWCC.

While the quantity measure is adequate as a gauge of throughput or activity, it could be improved by distinguishing between applications from volunteers and employees. As no fee is charged for volunteer applications, a more refined measure would give a better insight into the relative drivers of WWCC system costs.

The quality and timeliness measures are weak and do not enable readers of the budget papers to form a view as to how well the department is performing in key aspects of its operations and whether it is achieving its objectives.

An improved timeliness measure could provide information about application processing times.

5.2.2 Internal performance measures

As indicated above, the WWCC Unit's monthly activity report has a number of useful indicators of activity and performance. This information has been collected since the inception of the WWCC system. The WWCC Unit is therefore in a strong position to enhance the quality of its performance measures through the development of benchmark targets that will enable it to better assess its economy, efficiency and effectiveness.

Given the considerable public resourcing of the WWCC scheme, DOJ should be developing quality measures to demonstrate the effectiveness of the WWCC system in achieving the scheme's objectives.

DOJ has advised that to be able to demonstrate changes in the rate of harm against children there must be a reputable base measure from which to assess performance; however, no such measure exists at this stage.

We were unable to form any conclusions about the effectiveness of the WWCC in reducing the incidence of harm to children because the data held by Victoria Police does not relate to occupational category. At best the data currently collected through Law Enforcement Assistance Program only offers general information about the incidence of offences against children.

Nevertheless, it is incumbent on DOJ to identify data gaps by working with other government agencies if necessary, and to develop quality measurement options to improve the public reporting of the effectiveness of the WWCC scheme over time.

The 2008–09 business plan for the WWCC Unit has been enhanced to include additional operational performance measures. Beginning in July 2008, the WWCC Unit has commenced incorporating performance measures and targets into the monthly report to monitor the efficiency of their internal operations. These measures include:

- substantiated complaints about inaccuracy of WWCC information provided
- the timeliness of phasing in target occupational groups
- application processing times.

Conclusion

The overall objective and expected outcome of the WWCC is clearly defined in the *Working with Children Act 2005*. The primary focus of the WWCC system is to protect children from harm by checking on the suitability of persons who work with, or care for children, as prescribed in the legislation.

The relevant output measures specified in Budget Paper No. 3 are inadequate and should be improved to provide more pertinent information about the WWCC system, including an indication of the effectiveness of the WWCC system and whether it is achieving its stated objectives.

In terms of its internal performance measures, DOJ should also build on the information it has collected and reported through its monthly activities reports on the operations of the WWCC Unit and continue to develop performance measures and associated benchmark targets that will more adequately enable it to report on the economy and efficiency of its operations.

In addition, DOJ should be developing performance measures that link to the effectiveness of the WWCC scheme and demonstrate whether the objectives and expected outcomes of the scheme are being achieved over time.

Recommendation

- 5.1 DOJ should develop performance measures that demonstrate the achievement of the objectives and expected outcomes of the WWCC scheme.

RESPONSE provided by the Secretary Department of Justice

Recommendation 5.1 – Efficiency and Effectiveness of the Working with Children Check system – this recommendation is supported

The department notes the audit finding of the existence of a comprehensive quality assurance framework that provides an appropriate level of control and review. The department accepts that there are opportunities to continue to build and enhance existing performance measure monitoring.

The department accepts the recommendation that the Working with Children Check monthly report can be improved by the inclusion of narrative information that explains drivers and, the full suite of contractor performance measures. The department will also further consider the development of alternative measures, including potential modification to the Budget Papers No 3 Output Measures, which would further demonstrate the achievement of the objectives and expected outcomes of the Working with Children Check scheme.

Appendix A.

Interstate working with children schemes

Interstate working with children schemes

Queensland, New South Wales and Western Australia currently have schemes in place to check the suitability of people engaged in child-related work. The key characteristics of the screening processes in place for people who work with children in each jurisdiction are set out in Figure A1 below.

Figure A1
Comparison of interstate working with children schemes

	Victoria	NSW	QLD	WA
Transferable between work categories	Yes	No	Yes	Yes
Responsibility for submitting application	Applicant	Employer or organisation	Employer or organisation	Applicant
Statutory declaration required	No	Yes	No	No
Do volunteers require the check?	Yes	No	Yes	Yes
Ongoing monitoring	Yes	No	Yes	Yes
Check includes professional bodies	Yes	Yes	Yes	No
Responsible for final decision on suitability	WWCC Unit, DOJ	Employer or organisation	Commission for Children and Young People	WWC Screening Unit
Application fee	\$70 ^(a) free for volunteers	Nil	\$60. Free for volunteers	\$50 paid employees. \$10 for volunteers
Validity of check	Five years	One-off assessment per employment	Two years	Three years

(a) Fee increased to \$73.90 on 1 July 2008.

Source: Victorian Auditor-General's office.

Queensland (QLD)

The Victorian WWCC incorporated many of the major elements of Queensland's Working with Children Check. The QLD check has similar assessment processes to those in Victoria and applies to paid or voluntary employment. The check requires applicants to undergo a criminal record check and takes into account relevant disciplinary findings held by certain professional bodies.

The employer, volunteer organisation or education provider has responsibility for applying to the Children's Commissioner for a positive notice letter and a 'blue card' on behalf of their employee, volunteer or student. A blue card is valid for two years and is transferable across certain child-related employment, whether as a volunteer, paid employee or self-employed individual.

In Queensland, each employment category or business type has different requirements and exemptions, and applicants may be exempt from a check in one category but not under another.

If a blue cardholder commits an offence that will alter their criminal record, they are legally required to notify their employer or organisation immediately. The employer must notify the Commission for Children of a change in circumstances and a reassessment of the individual's suitability to undertake child-related work occurs.

New South Wales (NSW)

There are two key elements of the NSW Working with Children Check scheme. Under the *Child Protection (Prohibited Employment) Act 1998*, potential employees and volunteers who will be working with children are required to make a statutory declaration to their employer declaring that they have not been convicted or found guilty of certain sexual offences, which could classify them as an unsuitable or a 'prohibited person'.

Employers are then required to sight and verify proof of identity documents and apply for a Working with Children background check of those preferred applicants for paid child-related employment positions, foster carers and ministers of religion. Volunteers are not required to undergo a Working with Children Check in NSW. The assessment is based on the results of checks of the person's criminal history for relevant offences and disciplinary proceedings.

Unique to NSW, the results of the risk assessment are provided to employers, who retain ultimate responsibility for the decision as to whether or not the person should be employed in child-related employment and in what capacity.

The Working with Children background check is a one-off check in NSW, which is conducted before an applicant commences paid work in an organisation. The check remains valid as long as the person remains employed in the same position.

Western Australia

The Western Australian scheme has a number of similarities to the Victorian WWCC. It screens employees, self-employed persons and volunteers in defined categories of employment and takes into account convictions and charges for serious sexual and violent offences but, unlike other states, it does not consider disciplinary findings or proceedings of professional bodies.

The Working with Children Check in Western Australia is valid for three years and is transferable between work categories. Similar to the Queensland Check process, if a cardholder's criminal record alters, it is their responsibility to advise their employer or volunteer organisation of the change in circumstances immediately. A reassessment process will then occur.

Appendix B.

The Working with Children Check application and assessment processes

Application and assessment processes

Applicant preparation

After determining that they need a Working with Children Check (WWCC), an applicant must find out when they need to apply according to the phased implementation plan (Appendix C). If working or volunteering in two or more occupational fields, applicants must apply by the earliest of the two or more due dates.

A signed WWCC application form is lodged with appropriate proof of identity documentation at a participating Australia Post outlet. The applicant pays the application fee if undertaking paid 'child-related work'. In 2007–08 this amount was \$70. If the applicant is a volunteer, the WWCC is free.

Process application and proof of identity check

Staff at the Australia Post outlet review the lodged form and verify supporting documents, ensuring the application is complete.

The applicant is issued with an application receipt confirming lodgement. This enables them to prove they have commenced the WWCC process if so required.

Scan/capture data

Applications are scanned and converted to electronic form.

The scanned data is forwarded to the WWCC Unit via a secure process and uploaded to the ChildCheck database.

Verification process

The verification team within the WWCC Unit check the scanned application on the ChildCheck database to ensure it is complete.

The applicant's details are forwarded to CrimTrac, the federal agency that undertakes the National Criminal History Record Check.

Criminal record check

CrimTrac performs the criminal history record check by searching the National Names Index, a central index of names of persons of interest to police for a possible match.

If there is no name match, CrimTrac notifies the WWCC Unit that the applicant does not have a criminal history.

If the applicant has a potential match with the National Names Index, CrimTrac seeks further details from the relevant police jurisdiction. If the match is sustained, CrimTrac will fax the relevant information to a secure room at the WWCC Unit.

Perform professional body check

The WWCC Unit also asks prescribed professional bodies whether applicants have relevant disciplinary records that need to be taken into account (currently only the Victorian Institute of Teaching).

Review and assessment and Triage process

Applications with a relevant or non-relevant criminal history match are initially assessed by a member of the review and assessment team and given an initial offence type category, as prescribed under the Act. Based on this offence category, cases may be allocated for further consideration through the WWCC Unit's Triage process.

Category one

The Secretary must refuse to give a WWCC Assessment Notice to a category one application and issue a Negative Notice.

Triage—Category two, category three and exceptional circumstances

Applicant offences that are initially assessed as category two or three or potential exceptional circumstances, as prescribed under the Act, tend to be more complex than category one cases and require a more in-depth assessment. These cases are considered at the preliminary stage in the assessment of an application by a Triage Panel consisting of the Case Manager, Policy Manager and Legal Manager, Director of the WWCC Unit and the Executive Director of Community Operations and Strategy.

Applications with findings of a prescribed nature by a prescribed body (Victorian Institute of Teaching) are also considered at triage.

At the initial assessment stage the Triage Panel confirms the relevant offence and if additional information is required to assess whether the applicant poses a potential risk to the safety of children. Where additional information is not required the panel recommends the preparation of the application assessment briefing. The briefing assesses the relevant offences against the factors nominated in the Act, for determination by the Secretary (or delegate) as to the issue of an Assessment Notice or Interim Negative Notice.

Where additional information is required the Triage panel identifies the source, including the applicant, the employer/volunteer organisation, or other sources such as, Corrections Victoria, courts, and Victoria Police.

The Triage Panel decisions are recorded on the Triage Action cover Sheets (TACS).

As well as the triage process and following the receipt of any additional necessary information (if required), an application assessment briefing is prepared by the WWCC Unit. The briefing assesses the relevant offences against the factors nominated in the Act, for determination by the Secretary (or delegate) as to the issue of an Assessment Notice or Interim Negative Notice. The issuing of Notices is undertaken by the appropriate delegate level and can include the Director WWCC, Executive Director Community Operations and Strategy, and the Secretary, depending on the application category and notice being issued.

Decision

If a WWCC Assessment Notice is to be issued, the WWCC Unit forwards the relevant details to the card manufacturer, who then produces and issues the card. The WWCC Unit produce and issue the WWCC Assessment Notice.

If the Secretary (or delegate) intends to, or must, issue a Negative Notice, an Interim Negative Notice is issued first. The applicant is informed of the intention to issue a Negative Notice and afforded the opportunity to lodge a submission by a set date explaining why they believe they should pass the WWCC. This will be considered by the Secretary (or delegate) in assessing the application.

The WWCC Unit sends a copy of the Interim Negative Notice to the applicant's employer or volunteer organisation where known. No information about the person's criminal history is included in the correspondence.

The applicant is not prevented from continuing their child-related work while a final decision about their application is made; however, their employer, agency, or volunteer organisation may wish to put in place other arrangements while the application is being decided.

If a person subsequently receives a Negative Notice, they must inform their employer or volunteer organisation in writing within seven days. A copy of the Negative Notice is also forwarded by the WWCC Unit to the applicant's employer or volunteer organisation.

The WWCC Unit is bound by Victorian privacy and confidentiality legislation (*Information Privacy Act 2000* and *Health Records Act 2001*) and will not disclose the details of that record to an employer or agency without the applicant's consent.

Ongoing monitoring

The WWCC involves an ongoing check of a person's criminal record while the person's WWCC is valid. Victoria Police must notify the WWCC Unit of any new relevant offences that an applicant or a WWCC cardholder is charged with, convicted of or found guilty of. It also involves a review of any current and future relevant findings against a person from prescribed professional disciplinary bodies.

New relevant charges, convictions or findings of guilt or relevant findings will lead to a re-assessment process. If an individual has previously been given a WWCC Assessment Notice, they must notify their employer or volunteer organisation if they are subsequently given an Interim Negative Notice or Negative Notice. The Unit also sends a copy of these notices to the relevant employer or volunteer organisations where details are known.

Employers, volunteer organisations and agencies can verify the status of a WWCC application or card at any time on the WWCC website or the WWCC information line.

Appealing an outcome

The *Working with Children Act 2005* provides for a full range of appeal rights and Negative Notices may be appealed to the Victorian Civil and Administrative Tribunal (VCAT), provided the applicant is not subject to sex offender reporting requirements. VCAT can order that a WWCC Assessment Notice be given if the tribunal is satisfied that the issuing of a WWCC would not pose an unjustifiable risk to the safety of children.

Offence type

If an applicant is found to have a relevant criminal record or an adverse finding made against them by a professional disciplinary body, the assessment outcome is dependent on the nature of the offence committed and the circumstances surrounding it. Applications are classed as either category one, two or three, depending on the criminal record of the applicant.

Category one

An application is classed as category one if it involves offences of a serious sexual nature committed by an adult against a child. It also includes child pornography offences. Any person on the sex offender register or subject to the *Serious Sex Offenders Monitoring Act 2005* is classed as a category one applicant.

The WWCC Unit must give a Negative Notice to a category one applicant. The legislation does not allow any discretion to DOJ with this category of offence, although an applicant may appeal to VCAT.

Category two

Applications are classed as category two when the applicant has committed serious sexual offences against an adult or against children, when the offender was a child. It also includes serious violence or drug offences and a range of other crimes, such as loitering, stalking and certain carnal knowledge offences.

The WWCC Unit must give a Negative Notice to a category two applicant unless satisfied that giving the applicant a WWCC Assessment Notice would not pose an unjustifiable risk to the safety of children. In assessing this, factors prescribed in the legislation, such as the nature and gravity of the offence and when it occurred, along with the sentence imposed and the age of both the offender and victim at the time of the offence, are taken into account.

Category three

Applications are classified as category three where the applicant has either been subject to findings by a specified professional disciplinary body, has been charged or committed offences against the *Working with Children Act 2005* itself, or has a charge, conviction or finding of guilt of causing reckless or intentional injury or obscene exposure. Category three applicants must be given a WWCC Assessment Notice unless it is appropriate not to do so in the presented circumstances.

Full details of category one, two and three offences are outlined in sections 12, 13 and 14 of the *Working with Children Act 2005*.

Exceptional circumstances

Criminal offences not specified in the *Working with Children Act 2005* can also be considered if there is a potential link to a risk to the safety of children and exceptional circumstances exist that may justify a negative assessment. The WWCC Unit consider a range of factors in making this decision. These are outlined in section 17 of the *Working with Children Act 2005*.

Appendix C.

Working with Children Check implementation phasing plan

Implementation phasing schedule

Below is the phasing schedule for the implementation of the Working with Children Check by child-related work category.

Figure C1
Implementation phasing schedule

Child-related field	Date of implementation
Child protection services (Department of Human Services employees only), limited Juvenile Justice places or services	1 April 2006 to 30 June 2006
Fostering children (foster carers only)	1 April 2006 to 30 August 2006
Fostering children (other than above), remaining child protection services, remaining juvenile justice places or services, limited community services, child care services (specifically family day care and outside school hours care), school crossing services, overnight camps for children (not arranged by schools)	Year 1 1 July 2006 to 30 June 2007
Educational institutions for children (specifically state schools and non-government schools), outside school hours care, overnight camps for children (that are arranged by schools)	1 July 2006 to 30 December 2007
Educational institutions for children (specifically TAFE colleges, adult education providers, training providers), child care services (centre based long day care, occasional care, in home care)	Year 2 1 July 2007 to 30 June 2008
Babysitting or childminding services, designated clubs, associations or movements, paediatric wards	Year 3 1 July 2008 to 30 June 2009
Designated clubs, associations or movements, coaching or private tuition services	Year 4 1 July 2009 to 30 June 2010
Designated clubs, associations or movements, commercial services for children, including entertainment or party services, gym or play facilities, photography services and talent or beauty competitions	Year 5 1 July 2010 to 30 June 2011

Source: Department of Justice.

Appendix D.

Exemptions from the Working with Children Check

Exemptions

The following groups are exempt from obtaining a Working with Children Check:

- Parents and family members, including grandparents, aunts, uncles and siblings if volunteering in an activity with their child.
 - All children under 18 years of age. This also includes 18 and 19-year olds who are still at secondary school and participating in work experience and community programs organised by their school.
 - Teachers who are already regulated by the Victorian Institute of Teaching (VIT).
 - Sworn police officers who wish to work with children in a professional capacity or in their free time who are already monitored for criminal convictions by Victoria Police.
 - Visiting workers who do not normally live or work in Victoria.
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Appendix E.

Audit conduct

VAGO file review process and criteria

VAGO conducted a 'risk-based' review of 72 finalised WWCC application files (from 2006 to 2008), checking for accuracy, completeness and compliance with WWCC procedures and business rules. The types of files reviewed covered all relevant categories of applicants including those:

- with no criminal history who are referred to as 'clears' and are granted automatic approval regarding their suitability to work with children
- determined as having a 'non-relevant' criminal history, which results in an assessment of an applicant's suitability to work with children
- having a 'relevant' criminal history, where there is a match against the CrimTrac National Names Index, or a match with a finding of a prescribed kind made by a prescribed body, which necessitates an in-depth review by the WWCC Unit of the applicant's suitability to work with children
- who had appealed to the Victorian Civil and Administrative Tribunal (VCAT) for a WWCC Assessment Notice, and VCAT had either upheld the Negative Notice or directed the Secretary of DOJ to issue a WWCC Assessment Notice to the applicant
- that were identified in the ongoing monitoring process as being subject to a re-assessment of their ability to hold a WWCC Assessment Notice
- new WWCC Unit employees, where, to avoid potential conflicts of interest, criminal history and prescribed findings checks are conducted by Victoria Police instead of CrimTrac.

The audit criteria were based on the WWCC Unit's procedure and operational manuals, but were targeted to areas of greatest risk, rather than full compliance with procedures. The process used to conduct the review was different for the 'clears' files and the other file types.

'Clears' files

VAGO reviewed hard copies of application forms, and proof of identity documentation was compared against the scanned data record in the *ChildCheck* database for completeness and accuracy and compliance with the WWCC Unit's business rules.

The audit focused on the critical areas in the verification process, including:

- application forms
- proof of identity
- signatures
- photographs
- completion of the verification log.

Other files

Physical hardcopy applicant files were reviewed against the audit criteria, and targeted checks of the *ChildCheck* database were conducted where documentation was missing from a file.

The main criteria used to review the files were:

- completed Triage Action Cover Sheets
 - Interim Negative Notices and Negative Notices correspondence
 - VCAT appeals correspondence
 - mandatory requests to Victoria Police for additional criminal history information.
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Auditor-General's reports

Reports tabled during 2008-09

Report title	Date tabled
Managing Complaints Against Ticket Inspectors (2008-09:1)	July 2008
Records Management Checklist: A Tool to Improve Records Management (2008-09:2)	July 2008
Investing Smarter in Public Sector ICT:Turning Principles into Practice (2008-09:3)	July 2008
Private Practice Arrangements in Health Services (2008-09:4)	October 2008

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