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LEGISLATIVE CHANGE IMPLEMENTATION GUIDE

Child safety reform: what changed for frontline organisations in 2026

The regulator moved, the Working with Children Check changed, and both landed inside workflows that were built for the old arrangements. This guide takes one organisation through what to do about it.

INDEPENDENT DEMONSTRATION BY LEJACIE · CURRENT AT SEPTEMBER 2026

WHO THIS IS FOR

- Organisations covered by the Victorian Child Safe Standards and the Reportable Conduct Scheme
- Heads of organisation, people and culture, managers, frontline staff, contractors and boards (see section 2)
- Written around one example organisation: a community organisation running youth programs, school partnerships and community education

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4 November 2026: the content current at September 2026, set in Lejacie's current design. Chami Rupasinghe, admitted Australian lawyer (non-practising). Current at September 2026. General guidance for organisational practice, not legal advice. Check the Social Services Regulator's own guidance before relying on any detail. The example organisation is illustrative.

SECTION 1

What changed

Two changes, seven weeks apart, that most organisations experienced as a webform address changing and a compliance email arriving. Underneath them sit a different regulator, a different evidence standard for who may work with children, and a new way that an organisation's own records can end someone's clearance.

CHANGE	FROM	WHAT IT MEANS
Regulator transfer	23 Feb 2026	The Social Services Regulator (SSR) took over the Child Safe Standards and the Reportable Conduct Scheme from the Commission for Children and Young People. Reportable conduct notifications now go to the SSR. CCYP keeps its advocacy and monitoring role. The SSR already held the Working with Children Check, the Worker and Carer Exclusion Scheme and the NDIS Worker Screening Check, so for the first time one regulator sees all of them.
Co-regulators by sector	23 Feb 2026	Child Safe Standards regulation now sits with five bodies depending on the service: Department of Health (health), VRQA (schools and education), VECRA (early childhood), Workforce Inspectorate Victoria (employers of children), SSR (everyone else, including councils, community organisations and sport).
What the WWCC assesses	28 Jul 2026	The SSR can now consider any information relevant to child safety, not only convictions and formal findings: police intelligence, reportable conduct allegations including unsubstantiated ones that may show a pattern, investigation outcomes that led to no charge, and information from other jurisdictions. The paramount consideration is now the best interests, safety, welfare and wellbeing of children.
Information sharing	28 Jul 2026	All reportable conduct allegations and all findings now flow to the WWCC unit. The SSR shares with Victoria Police, the Reportable Conduct Scheme, the Worker and Carer Exclusion Scheme, VIT and VECRA. Information that is inconclusive alone can be read together to build a picture of risk.
Interim bars and suspensions	28 Jul 2026	The SSR can stop a person working with children while it reassesses eligibility, for six months initially and up to 24 months, reviewed at six months and then every three. A person under an interim bar cannot do child-related work, paid or voluntary. Employers are told the status has changed, not the reason.
Review pathway	28 Jul 2026	VCAT merits review is replaced by internal review with an independent expert advisory panel. 28 days to apply. Interim bars and suspensions cannot be reviewed; only final exclusion decisions can.
Mandatory training	Later 2026	Mandatory child safety training for WWCC applicants and renewals is flagged for later in 2026. Detail not yet published.
What did not change		The eleven Child Safe Standards. The five categories of reportable conduct. The three-business-day notification duty on the head of organisation. Who needs a WWCC. Mandatory reporting under the Children, Youth and Families Act. Crimes Act duties to disclose and protect. No new duty on employers to report concerns to the SSR outside the Reportable Conduct Scheme.

THE CHANGE THAT MATTERS MOST

Before July 2026, an unsubstantiated allegation stayed inside the organisation that investigated it. Now it travels to the WWCC unit, sits alongside anything else the SSR holds, and can end a clearance. An organisation's complaint files, incident reports and investigation findings are now evidence in a decision it does not make and will not be told the reasons for.

SECTION 2

Who is affected

The example organisation used through this guide: a community organisation running youth programs, school partnerships and community education, with around 40 staff, 60 volunteers and a dozen contractors, subject to the Reportable Conduct Scheme and regulated for the Standards by the SSR.

GROUP	HOW THE CHANGE REACHES THEM	WHAT THEY NEED FROM THE ORGANISATION
Head of organisation (CEO)	Still personally responsible for the three-business-day notification, now to the SSR. Every notification now has WWCC consequences for the worker.	A delegate and a protocol so awareness reaches them the same day.
People and culture / HR	Receives status-change notices from the SSR without reasons. Must act on a suspension or interim bar the day it arrives. Recruitment and screening records now have regulatory weight.	A same-day stand-down process, a template conversation, and a records standard.
Managers and team leaders	First to hear most concerns. Their judgement about whether a concern is "worth escalating" now shapes what the regulator sees.	A low, clear threshold for escalation and a script for the first conversation.
Frontline staff and volunteers	Anyone with a WWCC. A concern raised about them anywhere in Victoria can now reach their clearance. Renewals will soon require training.	Plain-language explanation of what has changed and what has not, and reassurance about fairness.
Contractors and partner organisations	Same WWCC rules apply. The organisation may be told a contractor's clearance is suspended with no reason and must still act.	Contract clauses requiring notification and cooperation, and a clear step-in process.
Children, young people and families	Should experience a system that responds faster and more consistently. Should not notice the machinery.	Nothing new to do. The test is whether reporting pathways still make sense to them.
Board and audit and risk	Governance exposure has changed: the organisation's records are now regulatory evidence, and a stand-down decision can arrive with no notice.	A one-page assurance report (section 7) and a policy refresh on the agenda.

SECTION 3

Where the existing workflow breaks

A walk through the organisation's pre-2026 process, with the points where the new arrangements catch it.

EXISTING STEP	WHERE IT NOW FAILS	FIX
Policy names CCYP as the notifying body and links to the CCYP webform	Wrong regulator, dead link. Staff following the policy notify nobody. Review date on the policy has passed.	Replace every reference; add the SSR webform; re-issue with a new review date.
WWCC verified at onboarding, expiry tracked in a spreadsheet	No process for a status change between renewals. A suspension notice from the SSR lands in an inbox with no owner and no same-day action.	Named recipient for SSR notices; same-day stand-down step; register records status, not just expiry.
Manager decides whether a concern is "serious enough" to escalate	Threshold is informal and varies by manager. Low-level boundary concerns are handled locally and never recorded. Under the new regime those are the ones that build a pattern.	Single escalation rule: any concern about an adult's conduct toward a child goes to the Child Safety Officer the same day, however minor it seems.
Investigation findings filed; unsubstantiated matters closed and not referred to again	An unsubstantiated finding is now shared with the WWCC unit and can be read alongside future information. Poor records or vague findings create unfairness in both directions.	Findings written to a standard: what was alleged, what evidence was found, what the finding is and why. Retained under the records schedule.
Contractor agreements require a current WWCC at engagement	No duty on the contractor to tell the organisation about a suspension, interim bar or a reportable conduct matter elsewhere.	Clause requiring notification within one business day and cooperation with any investigation; step-in right.
Stand-down handled as a disciplinary matter under the enterprise agreement	An interim bar is a legal prohibition on child-related work, not a disciplinary finding. Treating it as one confuses the process and the conversation.	Separate track: interim bar means immediate redeployment away from child-related work or paid leave, with no finding implied.

SECTION 4

Revised screening and escalation process

Two flows. The first is for a concern that arises inside the organisation. The second is for a notice that arrives from the regulator. They meet at the Child Safety Officer.

Flow A: a concern about an adult's conduct toward a child

1. Anyone notices or hears

A disclosure, an observation, a complaint, a pattern, a feeling that something is off. No threshold test at this step.

2. Same-day report to the Child Safety Officer

Manager or worker tells the CSO the same day, in writing where possible. If a child is at immediate risk, call 000 first.

3. CSO triage within one business day

Is a child safe now? Is it a police matter? Is it Child Protection? Is it a reportable allegation? Is it a conduct or boundary matter below that line? Can be more than one.

4a. Reportable allegation

CSO briefs the CEO the same day. CEO notifies the SSR within three business days of becoming aware. Interim risk controls on the worker, without any finding.

4b. Below the reportable line

Recorded on the concerns register with date, source, facts, action taken and by whom. Manager conversation with the worker. Reviewed by the CSO at the next monthly check for patterns.

5. Investigate, find, learn

Investigation to the records standard. Findings stated with reasons, whether or not substantiated. SSR updated. Systems question asked: what does this tell us about recruitment, supervision, environment or training?

> **Why 4b now matters as much as 4a.** The reforms mean unsubstantiated and below-threshold information can be read together to show a pattern. An organisation that records only what it escalates externally cannot see its own patterns, and cannot show a regulator that it acted proportionately when it noticed one.

Flow B: a WWCC status notice arrives from the SSR

1. Notice received

Arrives at the nominated address (people and culture inbox, monitored daily, with the CSO copied). Says the status has changed: suspended, interim bar, or exclusion. Gives no reason.

2. Same-day stand-down from child-related work

The worker cannot do child-related work, paid or voluntary, from the moment the bar applies. Redeploy to non-child-related duties or paid leave. This is a legal prohibition, not a disciplinary finding.

3. Conversation with the worker

Manager and people and culture, same day, using the script in section 6. State what the organisation knows (the status), what it does not know (the reason), and what happens next. Point them to the SSR and to support.

4. Check for anything the organisation holds

CSO checks the concerns register and any reportable conduct history. If the organisation has an open matter, the two processes run in parallel and do not wait for each other.

5. Rosters, access and partners

Remove from rosters, systems and sites involving children. Tell partner organisations where the person works on the organisation's behalf. Do not disclose the reason, because the organisation does not have it.

6. Track and review

Register the status and review dates. An interim bar runs six months and is reassessed at six then every three. Decide, with advice, what the employment position is while the bar continues.

THE ONE RULE EVERYONE NEEDS TO KNOW

Any concern about an adult's conduct toward a child goes to the Child Safety Officer the same day. Not "if it seems serious". Not "once I've checked". The same day. The CSO decides what it is; the person who noticed does not have to.

SECTION 5

Staff communication

One all-staff message, sent by the CEO, followed by a fifteen-minute item at each team meeting run by the manager using the guide in section 6. Plain language. Says what changed, what did not, and what it means for the person reading it.

From the CEO to all staff, volunteers and contractors

Child safety: what has changed in 2026 and what it means for you

Two things changed in Victoria's child safety laws this year, and I want you to hear about them from us rather than from a news story.

First, the regulator changed. Since February, the Social Services Regulator (the SSR) is responsible for the Child Safe Standards and for reportable conduct, instead of the Commission for Children and Young People. Our policy and our reporting form have been updated. If you have an old link saved, delete it.

Second, the Working with Children Check changed. Since 28 July, the SSR can look at more information when it decides whether someone keeps their clearance, including allegations that were never proven and concerns that never led to a charge. It can also suspend a clearance or put an interim bar in place while it looks into something. If that happens, the person cannot work with children until it is lifted, and we are told the status has changed but not why.

What this means for you. Nothing about your day-to-day work with children changes. Your obligations are the same as they were: if you notice or hear anything that worries you about how an adult is behaving toward a child, tell the Child Safety Officer the same day. You do not need to decide whether it is serious enough. That is their job, not yours.

What we are doing. We have rewritten our escalation process so that every concern is recorded, even small ones, because the new rules mean small things can matter later. We have set up a same-day process for the rare case where the SSR tells us someone's clearance has changed. And we have written a guide for managers so that if you ever need to have one of these conversations, you will not be doing it alone.

What has not changed. The Child Safe Standards. Who needs a check. Mandatory reporting. Your right to be treated fairly if a concern is ever raised about you: we will tell you what we know, we will not assume the worst, and we will point you to where you can get support and information.

Your manager will walk through this at your next team meeting. If you have a question before then, ask them or the Child Safety Officer directly.

SECTION 6

Manager guidance

The two conversations managers now have to be ready for, and the three things to say in each.

When a worker brings you a concern

1. **Thank them and take it.** "Thank you for telling me. I am going to pass this to the Child Safety Officer today." Do not assess it in front of them. Do not say "I'm sure it's nothing".
2. **Write down what you were told, in their words.** Who, what, when, where. Separate what they saw from what they think. Do not investigate, question the child, or approach the adult concerned.
3. **Report it the same day.** To the CSO, in writing. Copy the register. Tell the worker you have done it. If a child is at immediate risk, 000 comes before any of this.

WHAT MANAGERS SHOULD STOP DOING

- Deciding a concern is too minor to record.
- Having a "quiet word" with the adult instead of escalating.
- Promising a worker or a child that a concern will stay between you.

When a worker's clearance is suspended or barred

1. **Say what you know and what you do not.** "The SSR has told us your clearance is suspended. They have not told us why, and we have not been given any information about you. From today you cannot do work involving children until it is lifted."
2. **Say what happens next.** "You will be moved to [non-child-related duties / paid leave] while this is in place. This is a legal requirement, not a decision we have made about you, and it is not a finding."
3. **Point them to the SSR and to support.** "The SSR will contact you directly. Contact them for the reasons and the review process. Here is the Employee Assistance Program. I will check in with you on [day]."

WHAT MANAGERS SHOULD NOT DO

- Speculate about the reason, to the worker or anyone else.
- Tell the team more than "X is not working with children at present".
- Treat the stand-down as discipline, or let the worker treat it as a finding.

SECTION 7

Assurance

How the organisation knows the change has landed, rather than that the memo was sent. Three layers: a completion check for the implementation itself, evidence from practice at 90 days, and a standing line in the board's child safety report.

Implementation completion check

- Safeguarding policy re-issued naming the SSR, with the correct webform, new review date, board-endorsed.
- Reporting form and intranet links updated; old CCYP links removed.
- Named recipient for SSR status notices; inbox monitored daily; CSO copied.
- WWCC register records status and review dates, not only expiry.
- Concerns register live, with the same-day rule and the below-threshold category.
- Findings template adopted: allegation, evidence, finding, reasons.
- Records retention confirmed against the applicable schedule.
- Contractor and partner agreements varied: notification within one business day, cooperation, step-in.
- Stand-down procedure separated from disciplinary procedure; enterprise agreement implications advised on.
- All-staff message sent; team meeting item delivered to every team; attendance recorded.
- Manager guide issued; every people manager has walked through both scripts.
- Board and audit and risk committee briefed; assurance line added to standing report.

Evidence from practice at 90 days

Recognition. Ask ten staff at random: "If you saw something that worried you about an adult and a child, what would you do and who would you tell?" Count how many say "the Child Safety Officer, the same day."

Escalation. Concerns register entries in the 90 days compared with the 90 days before. A rise is expected and is a sign the message landed, not that harm increased. Zero below-threshold entries means managers are still filtering.

Records. Sample three closed matters. Does each finding state the allegation, the evidence, the finding and the reasons? Could a reader who was not involved understand it?

Notice handling. Run a tabletop exercise: a suspension notice arrives at 4.30pm on a Friday. Walk it through Flow B. Time how long each step takes and where it stalls.

Managers. Ask five managers to deliver the suspension conversation from the script in a practice session. Note where they add speculation, soften the prohibition or imply a finding.

Contractors. Confirm every contractor with child contact has signed the varied clause. List the ones that have not.

THE STANDING LINE FOR THE BOARD REPORT

Each quarter, one paragraph: number of concerns recorded (above and below the reportable line); number of SSR notifications made and whether each met the three-business-day requirement; number of SSR status notices received and time to stand-down for each; sample findings reviewed against the records standard; outstanding actions from the implementation check. The question the board should ask is not "did we comply?" but "can we see our own patterns, and would we have seen them before the regulator did?"

WHY THIS EXAMPLE

Legislative change that alters practice without altering obligations

The 2026 changes are a clean example of legislative change that alters practice without altering obligations. Nothing an organisation must do changed; where it must do it, and what happens to the information afterwards, did. That is the kind of change that is easiest to miss and hardest to explain, because the compliance checklist still ticks. The government's own guidance acknowledged that comprehensive guidance materials and training were needed to support implementation of the reforms. This guide is one organisation's version of that work, built so that the people who have to do something differently can see what, when and why.

AUTHOR

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SOURCES

vic.gov.au, New reforms to strengthen child safety (23 February 2026); vic.gov.au, Changes to the Working with Children Check from July 2026; Social Services Regulator, Reportable Conduct Scheme. The example organisation is illustrative.

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