



Kit's Commitment to Child Safety

16 October 2023

1. Purpose, Scope and Audience

The purpose of this document is to demonstrate Kit's commitment to the safety and welfare of children and young people, by embedding the National Principles for Child Safe Organisations to minimise the risk of abuse, misconduct and misuse of positional power, as well as inform all staff and volunteers of their obligations and responsibilities in keeping children safe.

This policy applies to all Kit staff members, the Kit Advisory Panel, as well as contractors or consultants we engage who may be in contact with children. It applies to all activities in the organisation which involve, result in or relate to contact with children, both online and offline. The digital nature of Kit's services means in-person interaction with children is limited to product research and testing.

2. Child Safe Statement

Kit is committed to the safety and well-being of children and young people and is committed to creating and maintaining a child safe organisation.

We have zero tolerance of child abuse and exploitation and are committed to actively contributing to a child safe environment both online and in-person where children are protected from harm and abuse, and having clear processes to follow when concerns about child safety or abuse are raised.

Our commitment to the safety of children is based on our duty of care and responsibilities to children and always acting in the best interests of children.

Our commitment will be enacted through the implementation and ongoing monitoring of our performance against the Commonwealth Child Safe Framework. National Principles for Child Safe Organisations.

We are committed to ensuring children feel safe, empowered and are taken seriously if they raise concerns in relation to their safety and well-being.

We value and support diversity, inclusion and equality. In acknowledgment of the particular vulnerabilities of these groups of children, and in accordance with the Child Safe Standards.

3. Our commitment to ensuring a child safe organisation

Leadership and culture

As part of CBA Group, Kit applies CBA policies, including its operational and compliance risk management frameworks. As part of this, we conduct an annual risk, control and compliance self-assessment, control assessment program (CAP) and incident/issue management. As part of these processes, we evaluate potential online and offline harms to children, ensure we have appropriate controls in place, and continuously review and improve our implementation of the Child Safe Standards.



Our governance spans across CBA Governance bodies, x15ventures Board and x15 -risk & operations committee which oversees governance and effective management of compliance, operational and technical risks and incidents.

Kit's Chief Risk & Operations Officer is accountable for user and child safety.

Recruitment, Training and Supervision

All Kit staff undergo employee due diligence screening and background checks. Kit will ensure that all staff and Advisory Panel members have a current Working With Children Check (WWCC). Kit Advisory Panel members have also undergone background checks. We will ensure all new and existing employees understand the importance of protecting children from harm, including mandatory e-learning on supporting vulnerable customers and supporting accessibility and inclusion.

All staff and suppliers are expected to abide by the CBA Code of Conduct and Kit's Child Safety Code of Conduct, which specifies the standard of conduct required when working with children.

We will ensure staff understand the process for reporting any child safety issues and are supported by management to do so.

We are committed to ensuring staff and contractors, depending on the nature of their role understand that child safety is everyone's responsibility. We will ensure all stakeholders are provided with the necessary support to fulfil their obligations in relation to child safety.

Involving and Listening to Children and Families

Kit regularly solicits and listens to customer feedback, to understand opportunities to improve and to prioritise features on our product roadmap. We regularly ask parents (and through them, their children) to report on their likelihood to recommend Kit and ask them for feedback and suggested improvements.

We conduct more in-depth research as required from time to time through online surveys and/or workshops or interviews (online and in-person) with children and their parents to test new features. Suppliers who conduct this on our behalf, are appropriately vetted and hold Working with Childrens Checks if required, and are also required to abide by the Kit Child Safety Code of Conduct. Consent for collection and use of data is obtained prior to these interviews. Where consent is not given for use outside of research purposes, any images/video that are recorded are stored in a secured folder, and then deleted after the research findings are synthesised. Written findings are anonymised and aggregated. In-person events are subject to CBA's Work Health and Safety Policy, including risk assessments where necessary.

Kit also has an Advisory Panel who bring together expertise in working with children and families, youth mental health and wellbeing and financial capability, and advise on product development. We also consult with community stakeholder groups as required to provide input into our product development.



Reporting

Management supports and encourages our employees to proactively report any behaviour deemed to be endangering the safety of children. All allegations and concerns in relation to children's safety, whether online or offline, will be taken seriously and will be investigated fairly and appropriately. We will report confidentially to the e-Safety Commissioner for suspected online abuse, and the relevant state authority accountable for child protection in each state/territory, and the police if required. Incidents that occur on CBA property will also be reported and managed in accordance with CBA's Incident Management Procedure. Complaints, including those for breaches of Acceptable Use, can be made through the Kit App or on our website, are managed in accordance with the [Kit Complaints Policy](#) and are reported to our risk and operations committee and to ASIC.

Data Privacy and Security

We apply Safety by Design principles, including that we collect Personal Information fairly and lawfully, and only what is necessary for the Kit App and financial product to operate. We gain consent from parent/guardian for the collection of child-related data. We clearly outline what personal information is being collected and how it is protected and handled in our [Kit Privacy Policy](#). We do not share children's data with any third parties outside of what is necessary to operate the product.

All staff complete mandatory training on the Australian Privacy Principles and Data Classification and Handling.

Minimising the opportunity for harm, financial abuse, fraud and scams in online environments

An adult parent/guardian is required to sign up for Kit before a child profile can be created, and it is at the parent/guardian's discretion as to whether the child is granted access to the app. There is no interaction outside of that between parent and child in the Kit App, which minimises the potential for abuse by third parties. There is no ability in the app for children to send communications, however they do receive transfer descriptions along with transfers into the account, which can be made by their parent/guardian or another third party.

We support the online safety of children and their families by:

- Electronic identity verification for adults signing up for the product
- Delivering content for parents and children to educate them on how to detect fraud and scams, and the importance of keeping their PIN and card safe.
- Blocking purchases that are typically restricted to 18+, such as tobacco and gambling.
- Supporting parents to identify unusual transactions through real-time notifications, and enable the card to be locked immediately.
- Conducting transaction monitoring to identify and block unusual transactions and closing accounts that are not consistent with use as a children's pocket money app
- Outlining in our [App Terms and Conditions](#) Acceptable Use and our right to block or discontinue App access for breaches of the terms.



Marketing and Content

Kit is a financial product that requires an adult parent or guardian to sign up for the product, and age verification is conducted at the point of sign up. Kit does not market directly to children, and we do not advertise in channels or platforms which are specifically targeted towards children. We assess our marketing materials for compliance with the Children's Advertising Code in Australia.

Where talent under 18 is used in our advertising material, we ensure that the appropriate consent and talent release is in place. We review the tone of voice and creative treatment of our marketing material to ensure that it is targeted at adults and compliant with all relevant regulation.

Educational content in the App goes through an internal approval process to ensure factual accuracy, age-appropriateness and compliance with relevant legislation. We consider the needs of diverse audiences by meeting WCAG 2.1 accessibility standards.

Relevant Policies and Procedures

- CBA Vulnerable Customer Procedure
- CBA Incident Management Policy and Procedure
- [Kit Complaints Policy](#)
- [Kit Privacy Policy](#)

Relevant legislation and standards

- The United Nations Convention on the Rights of the Child.
- Child Protection (Working with Children) Act 2012
- Work Health and Safety Act 2011
- Online Safety Act 2021
- The National Principles for Child Safe Organisations
- Privacy Act 1988
- Children's Advertising Code in Australia