



## CHILD PROTECTION POLICY V3.3

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## **1 PURPOSE**

The purpose of this policy is to establish and maintain a 'child safe' culture at St George Christian School ('the School') in which the safety of children is considered paramount to our purpose as an organisation. The policies and procedures outlined within aim to make the children at the School and the School itself a safe place by systemically:

1. Creating and maintaining a culture and systems which reduce the risk of harm to students;
2. Creating and maintaining conditions that increase the likelihood of children and adults reporting allegations of abuse; and
3. Consistently responding effectively and efficiently to any disclosures or allegations of harm to children.

## **2 CONTEXT**

### **2.1 Christian Context**

As a Christian organisation, the School seeks to provide all students with an excellent academic education, taught by committed Christian teachers in a safe and supportive environment. This is based on the values and worldview of Jesus, in order that our graduates will be able to fulfil their God-given potential and to make a Christian impact on society. To that end, the School seeks to provide a clear framework for creating a child safe culture at the School.

The School recognises that all children are precious in the sight of God. The Bible indicates that the nurture of children is a high priority in the community with specific responsibility being given to parents (for example, Deuteronomy 6:7, 11:19, Ephesians 6:4). In the context of a Christian School, this responsibility is delegated to all members of staff. The love clearly described in 1 Corinthians 13, must guide the staff's words and actions as they stand in the place of parents "Love does not delight in evil, but rejoices with the truth. It always protects, always trusts, always hopes, always perseveres." (1 Corinthians 13:6,7).

As Christians, therefore, all adults in the school community must be committed to the care and protection of children, and particularly from any kind of abuse or neglect.

### **2.2. Legal Framework**

#### **2.2.1 UN Convention on the Rights of the Child**

This Convention, established in 1989, and ratified by Australia in 1990 established, in law, the view that children were to be regarded as human beings with the full rights and privileges which that entails. It promotes the view that every child has the right to health, education and protection, and that every society has a stake in expanding children's opportunities in life. The four guiding principles of the Convention are:

1. Respect for the best interests of the child as a primary consideration;
2. The right to survival and development;

3. The right of all children to express their views freely on all matters affecting them;
4. The right of all children to enjoy all the rights of the CRC without discrimination of any kind.

Since 2006, the UN has focussed particularly on the issue of violence against children and has actively campaigned to reduce such actions. The 2030 UN Agenda includes specific targets in this area showing the world's commitment to end all forms of abuse against children.

### **2.2.2 The Royal Commission and the Child Safe Principles (Federal)**

The *Royal Commission into Institutional Responses to Child Sexual Abuse (2013-2017)* exposed many cases of organisations that had failed to protect the children in their care from abuse and highlighted that in many organisations these problems are not only a past reality but a present one. The Commission made many recommendations, based on their findings, but most significantly for organisations, they recommended the use of the *10 Child Safe Standards* which provide tangible guidance for organisations as they seek to establish child safe cultures, create and enact policy and put the interests of children first. These Child Safe Standards provide the framework for the School's Child Protection Policy.

### **2.2.3 NSW Legislation and Regulation**

In 2019, the *Children's Guardian Act* was passed and commenced on 1 March 2020. It replaced the previous legislation (*Children and Young Persons [Care and Protection] Act 1998*) and moved responsibility for regulation in this area from the Ombudsman to the Office of the Children's Guardian (OCG). The role of the OCG is to keep children safe. The Act also consolidated the functions of the OCG for regulating children's employment and expanded their functions to include reportable conduct in the religious and faith-based sector. Other relevant legislation and regulation to this policy include:

- Child Protection (Working with Children) Act, 2012 – which regulates the checking of all people working with children through the Working with Children Check process;
- Child Protection (Working with Children) Regulation, 2013 – which provides guidelines for the enacting of the above Act;
- Child Protection (Working with Children) Amendment (Statutory Review) Act, 2018 – makes some minor changes as to who is included in the above Act and to offences for non-compliance;
- Children and Young Persons (Care and Protection) Act, 1998 – this Act provides for services to care for the wellbeing of children and the systems of protection for them, this is especially regarding the role of the Department of Communities and Justice (NSW);
- Children and Young Persons (Care and Protection) Regulation, 2012 - which provides guidelines for the enacting of the above Act;
- Child Protection (Working with Children) Amendment (Statutory Review) Act, 2018 – which ensures that organisations conduct necessary working with children checks.

The Children's Guardian Amendment (Child Safe Scheme) Bill 2021 meant that from 1 February 2022 child-related organisations, including schools, must implement the Child Safe Standards. The scheme also increased the powers of the Office of the Children's Guardian to monitor, investigate and enforce the implementation of the Child Safe Standards to support the safety and wellbeing of children and young people.

### 3 DEFINITIONS

**Children** refers to all children and young people under the age of eighteen (18) years. For the School's purposes, it includes those who have turned 18, but remain students of the School.

**Child Abuse** refers to all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

**Child Sexual Abuse** is when someone involves a child or young person in a sexual activity by using their power over them or taking advantage of their trust. Often children are bribed or threatened physically and psychologically to make them participate in the activity. Child sexual abuse is a crime.

**Child Physical Abuse** is a non-accidental injury or pattern of injuries to a child caused by a parent, caregiver or any other person. It includes, but is not limited to, injuries which are caused by excessive discipline, severe beatings or shakings, cigarette burns, attempted strangulation and female genital mutilation. Injuries include bruising, lacerations or welts, burns, fractures or dislocation of joints. Hitting a child around the head or neck and/or using a stick, belt or other object to discipline or punish a child (in a non-trivial way) is a crime. Physical abuse is any action of an unwanted nature inflicted upon a person which incurs hurt or harm to their bodies.

**Child Protection Contact Person** is the person nominated to manage Child Protection matters within the School. The Principal is the Child Protection Contact Person for the School. The role may be delegated to the Heads of Departments and/or School Counsellors.

**Child Psychological Abuse or Harm** is serious psychological harm which can occur where the behaviour of a child or young person's parent or caregiver damages the confidence and self-esteem of a child or young person, resulting in serious emotional deprivation or trauma. Although it is possible for 'one-off' incidents to cause harm, in general it is the frequency, persistence and duration of the parental or carer behaviour that is instrumental in defining the consequences for that child. This can include a range of behaviours such as excessive criticism, withholding affection, exposure to domestic violence, intimidation or threatening behaviour.

**Child Related Work** is providing a service for children aged eighteen (18) years or under where the work normally involves being face to face with children and where contact with children is more than incidental to the work.

**Children with Vulnerabilities** refers to children who may be exposed to greater risk due to their experience, ability, location or background. The Royal Commission identified in particular Aboriginal and Torres Strait Islander children; children from culturally and linguistically diverse (CALD) backgrounds and children with a disability as being particularly vulnerable groups.

**Complaint** means any suggestion of abuse or harm that is disclosed, witnessed or demonstrated by a child. Typically, three categories of behaviour are the subject of a complaint:

1. *Concerning conduct* – behaviours or patterns of behaviour that are a risk to the safety of children. This also refers to ambiguous behaviours that are potentially inappropriate for children to be exposed to but may not necessarily be indicators of abuse occurring. The sharing of inappropriate jokes may be an example of this;
2. *Misconduct* – behaviours that constitute a breach of the School's Code of Conduct;
3. *Criminal conduct* – conduct that, if proven, would constitute a criminal offence.

**Duty of Care** is the duty all School Community Members have to take reasonable care of the safety and welfare of students in their care. That duty includes considering and taking all reasonable action to protect students from known hazards or risk of harm that can be reasonably predicted. The standard of care that is required of a School Community Member must take into consideration various factors, such as a student's maturity and ability. This duty of care owed to students by all School Community Members applies during all activities and functions conducted or arranged by the School where a student is in the care of a School Community Member. The risk associated with any activity needs to be assessed and managed by the relevant Head of Department or delegate before the activity is undertaken. A single serious failure to exercise appropriate duty of care, or persistent repeated failures, may constitute neglect or negligence according to the law if actual harm is caused, or if there is the potential to cause significant harm to a student.

All School Community Members also have a duty to not neglect the welfare of students. Neglect includes either an action or inaction by a person who has care responsibilities towards a student which may include:

- supervisory neglect (failure to adequately supervise a student);
- carer neglect (grossly inadequate care of a student);
- failure to protect from abuse (unreasonable failure to respond to information that may result in harm to a student), and/or;
- reckless acts or failure to act (including a gross breach of professional standards that may result in harm to a student).

**Equity** is giving opportunities appropriate to abilities; equality is treating everyone the same way.

**Grooming** means gaining or increasing access to a child, parents or co-workers in order to facilitate abuse. The process involves building trust, obtaining compliance and maintaining secrecy to protect the abuser from being caught. Grooming is commonly an incremental process and can involve stages of increasing intensity. It may consist of many separate actions that, in isolation, are not necessarily criminal or abusive. Grooming behaviour may not be obvious to the victim or to a bystander and can co-exist with

behaviour that occurs in normal relationships between adults and children. Children do not need to be alone to be groomed. It occurs further when an adult person engages in conduct that exposes a child to indecent material or provides a child with an intoxicating substance or with any financial or other material benefit with the intention of making it easier to procure the child for unlawful sexual activity. Children are usually sexually abused by someone they know. Online communication and pornography can be used as tools for grooming.

**Head of Agency** is the chief executive or other principal officer of the agency. At the School, the Principal is the Head of Agency.

**Leader** means anyone in a position of authority in a child-related organisation, including, at the School, Board Members, the Principal, Heads of Departments, Faculty Coordinators, Directors and Year Advisers. One of the findings of the Royal Commission, however, was that all adults have a responsibility for child safety, so leadership is a shared responsibility in this context.

**Neglect** is the continued failure by a parent or caregiver to provide a child with the basic things needed for his or her proper growth and development, such as food, clothing, shelter, medical and dental care and adequate supervision.

**Organisational culture** means the organisation's values as demonstrated on a day-to-day basis by its leaders and staff, and as experienced by the children they care for. It is founded on the organisation's values and supported by leadership and governance.

**Reportable Allegation** is an allegation of reportable conduct against an employee.

**Reportable Conduct** is any sexual offence or sexual misconduct, committed against, with, or in the presence of a child (including a child pornography offence or an offence involving child abuse material), any assault, ill-treatment or neglect of a child, or any behaviour that causes psychological harm to a child, whether or not, in any case, with the consent of the child.

**Staff** refers to all paid and voluntary employees, whether employed on a permanent, temporary or casual basis, and all persons who have been engaged to work within the School or who have face to face contact with students of the School in any place and on any basis, including contractors, coaches, persons holding a church ministry licence or church-appointed position, consultants, students on tertiary practicum placements, or adult volunteers working with students in any capacity.

## 4 POLICY

All Staff will consistently seek to create and maintain a child safe culture at the School by embedding child safe attitudes, behaviours and practices at every level of the organisation.

The 10 Child Safe Standards (the Standards)<sup>1</sup> will provide the framework for all Child Protection policies and procedures at the School:



<sup>1</sup> For more information about the Standards see [https://ocg.nsw.gov.au/sites/default/files/2021-12/g\\_CSS\\_GuidetotheStandards.pdf](https://ocg.nsw.gov.au/sites/default/files/2021-12/g_CSS_GuidetotheStandards.pdf)

## **5 PROCEDURES**

### **5.1 Standard 1: Child Safety is Embedded in Organisational Leadership, Governance and Culture**

#### **5.1.1 Promoting a Child-Safe Organisation**

##### **Policy and Procedures for the Principal**

The Principal will ensure that this Policy and the Child Safe Standards, upon which it has been developed, are effectively understood and implemented by all Staff (paid and voluntary) and students by:

1. Ensuring that this policy is established and maintained as a priority at the School.
2. Developing and ensuring the principles with the "SGCS Statement of Commitment to Child Safety" are held to by all Staff and students.
3. Making this statement publicly available through the school's website.
4. Ensuring that all Staff new to the School and all existing staff sign and are held to the SGCS Staff Code of Conduct (Appendix 3).
5. Ensuring the ongoing education of Staff regarding the SGCS Staff Code of Conduct in Whole School Staff Meetings.
6. Approaching Child Protection using a risk management approach (see the School's separate Risk Management Policy for how this is implemented in practice).
7. Ensuring that all child protection complaints are dealt sensitively, efficiently and transparently and in accordance with the procedures in Section 6.
8. Ensuring that Child Safety is a standing agenda item at Heads of Department meetings within the context of the Child Safe Standards.
9. Ensuring that Staff are aware of their obligations regarding sharing information and record keeping (see especially Sections 5.5. and 5.6. for how this is done).

##### **Policies and Procedures for Heads of Departments and other Leaders**

Heads of Departments and other Leaders (including Directors, Lead Teachers, Faculty Coordinators and those in more informal leadership roles) will lead in their respective areas to ensure that the Child Safe Standards are understood and implemented with their area of responsibility by:

1. Heads of Departments and Subject Coordinators will ensure that the substance of this policy, where relevant, is integrated into the PDHPE curriculum and/or addressed in student information sessions.
2. Heads of Departments will ensure that child safety is a regular agenda item at department meetings by highlighting/reviewing the Child Safe Standards as appropriate with their Staff as issues arise or within the focus standard for the year.
3. Year Advisers, Homeroom Teachers and Classroom Teachers will ensure that child safety is a priority in all learning environments and that all opportunities are taken to address this pastorally through roll call times and other special events.

4. Heads of Departments will make publicly available (through methods appropriate to the context and developmental needs of their students which may include posters, information on the LMS and school website and in the school diary or planner) materials promoting child safety.

## **5.2 Standard 2: Children Participate in Decisions Affecting Them and are Taken Seriously**

### **Policy**

The School will seek to create an environment to empower students to speak up and to know they will be believed, in all contexts, but especially regarding issues of child safety. Students will be provided with formal and informal opportunities to share their opinions regarding their own safety and their ideas about how to promote this within the school setting.

### **Procedures**

Each Department, managed by the Head of Department, provides developmentally appropriate formal and informal opportunities for children to express their opinions in a range of contexts including:

1. Focus group consultation with students;
2. Student surveys;
3. Educating staff about the process of student participation;
4. Informing parents and caregivers about the process of student participation in general terms through parent letters and information nights;
5. Readily accessible links for students to participate available via the School Website, Parent Portal and the Learning Management System;
6. Opportunities to give input in the area of policy development;
7. Educating and empowering students to speak to a member of Staff when they feel unsafe and training Staff so they can create child-friendly ways for students to communicate and raise concerns;
8. Providing opportunities for students to participate in abuse prevention programs and access information that is developmentally appropriate.

## **5.3 Standard 3: Families and Communities are Informed and Involved**

### **Policy**

The School recognises that families have the primary responsibility for the upbringing and development of their child(ren) and, as such, should have a right to participate in decisions affecting their child. As a result, the School will seek to create an environment and empower parents and members of the broader community to be heard, especially regarding issues of child safety by providing opportunities for open two-way communication. This will be through formal and informal opportunities to share their opinions regarding child safety and their ideas about how to promote it more effectively within the School setting.

## Procedures

The School will promote opportunities for families and community members to be informed and involved through:

1. Biennial survey with parents;
2. Regular updates about Child Safety to parents
3. Access to information about the School's operation, governance, policies and practices
4. Important updates about Child Safety provided to parents and caregivers through emails from the Principal or Heads of Departments (for example, in response to a specific Child Safety concern);
5. Parent Connect Meetings;
6. Volunteering to be involved with initiatives within the School;
7. The School's Communication Policy;
8. *Strong Hearts, Strong Minds* workshops and seminars which promote student wellbeing.

The School is aware that this is an area for growth and will seek continual improvement in the coming years.

## 5.4 Standard 4: Equity is Upheld, and Diverse Needs are Taken into Account

### Policy

The School recognises the biblical truth that each one of us is made by God, uniquely, and has different strengths and capacities. As such, we seek to meet each student where they are and help them to grow and make progress as both learners and whole people within this framework. All students are provided with opportunities to participate to their full potential and to feel valued for who they are. Particular support is given to students with vulnerabilities, whether it be due to a disability, being from a different cultural or linguistic background, including those of Aboriginal or Torres Strait Islander heritage, or another reason. This is primarily achieved through the School's approach to Student Support and Wellbeing.

### Procedures

1. The School's *Student Support Policy* and the many staff in this area (including Teachers, SLSOs and School Counsellors) are an integral part of the school's approach to Student Support;
2. The School's Departmental Student Wellbeing Policies are important to the school's approach to meeting students within their ethnic, religious, cultural diversity and individual needs.
3. The School's *Risk Management Policy* and Committee actively promote inclusion and safety, especially of students with disabilities.
4. Through the Chapel Program, Christian Principles and Relationships classes, Biblical Studies classes, PDH programs and other specific initiatives (eg the BATYR program), the school actively teaches students to be aware of the uniqueness and dignity of others and to embrace an attitude of love for all people.

## 5.5 Standard 5: People Working with Children are Suitable and Supported

Through the range of processes outlined in this section, the School ensures that child safety is emphasised in the recruitment, employment, induction and supervision of all Staff at the School.

### 5.5.1 Employment of Paid Staff

#### Policy

The Staff Policy requires that Staff who are appointed to positions in the School are suitable persons to occupy those positions. The School will only engage Staff in child-related work who hold a current Working with Children Check (WWCC) number. The School will not employ barred or interim barred persons, those whose clearances have expired, or those who are not found on the Working with Children Check (WWCC) number database.

#### Procedures

1. All job applications for paid Staff will require the provision of a WWCC number;
2. Once an applicant's appointment has been decided upon, and prior to their written letter of appointment, the Principal or Head of Department will advise the Office Manager that a WWCC number needs to be verified;
3. The Office Manager will then verify the applicants WWCC;
4. A formal letter of offer may then be sent to the applicant and a copy of the verification placed by the Office manager on the staff members file once the offer has been accepted. Their name is then added to the WWCC Register and a Flag is entered onto the staff member's files with the expiry date;
5. The Principal will ensure that the Office Manager's WWCC number is verified by the Business Manager when it is due for renewal:
  - a. The EA to the Principal will verify the Office Manager's WWCC number at employment;
  - b. The Office Manager will inform the EA to the Principal of the expiry date of their WWCC number;
  - c. The EA to the Principal will send an email reminder to the Office Manager three months prior to the expiration WWCC number (if this is not responded to a further reminder will be sent two months prior, one month prior and then three, two and one week prior until the renewal has been completed);
  - d. The Office Manager will send an email to the EA to the Principal when their WWCC has been renewed;
  - e. The EA to the Principal will confirm the verification of the WWCC Number and then save a copy of the verification to the Office Manager's file and note the new expiration date in their records.
6. The Officer Manager will actively monitor WWCC numbers due for expiry by verifying the renewal status before the expiry date:
  - a. The Office Manager will send an email reminder to the staff member three months prior to the expiration of their WWCC number (if this is not responded to a further reminder will be sent two months prior, one month prior and then three, two and one week prior until the renewal has been completed);
  - b. The Staff member will send an email confirmation to the Office Manager when their WWCC has been renewed;

- c. The Office Manager will verify the WWCC Number and then save a copy of the verification to the staff member's file and note the new expiration date on the WWCC number register;
7. The Office Manager will immediately report any breaches regarding WWCC numbers to the Principal who will either ensure that the staff member holds a current clearance or is removed from duty;
8. The Office Manager will maintain a WWCC Number Register for Staff (including casual Staff and Volunteers). The Register will include: Employee's full name, date of birth, WWCC number, start date, initial verification date, initial verification outcome, current verification date, current verification outcome, expiry date and whether the Staff member is paid or is a volunteer;
9. The Principal will ensure that any barred or unauthorised person is removed from child-related work. The Principal may, depending on the circumstances, dismiss the Staff member or suspend them from child related work pending the outcome of any appeal.

## **5.5.2 Engagement of Volunteers**

### **Policy**

All volunteers and unpaid Staff (unless exempt, based on specific advice from the OCG) will be required to provide details of a WWCC number prior to participation as a volunteer. These records will be held by the School.

Legislation states that parents or close relatives are exempt when volunteering with the School or with a team, program or other activity in which their child usually participates or is a team member. At the School, we encourage all parent volunteers to provide details of a WWCC number even if they are in this or another exemption category, if possible, though there may be circumstances where this is not practical.

A visitor to the school, who will be onsite for a limited period of time and will have no opportunity for private contact with students may be allowed to attend for the purpose of their visit without a verified WWCC. They are the responsibility of the paid staff member who invited them who must remain in visual contact of this person for the duration of their visit. A Risk Assessment must be created in this case by the Staff Member.

### **Procedures**

1. Staff who are responsible for engaging volunteers (apart from those listed in the preceding paragraph as being exempt), including as coaches, will advise the Office Manager of the names of volunteers via email;
2. The Office Manager will then forward the Volunteer Form for completion which should be returned to the Office Manager;
3. Volunteers must complete the SGCS Volunteer Form (Appendix 5) which requests a WWCC number and date of birth;
4. The WWCC number is verified once the Office Manager receives the form and before the volunteer starts at the School;
5. For volunteers, the verification status must state that the volunteer has a current Volunteer Working with Children Check number;
6. This person may then be engaged in any unpaid child-related role;

7. For any results other than "the person may be engaged in any child related role", the Office Manager will advise the Principal immediately and they will take any appropriate action;
8. Once verification status has been cleared, the Office Manager will retain a copy filed in the Volunteer WWCC folder, and the volunteer's name will be added to The Register;
9. The volunteer's supervisor will be advised by the Office Manager, via email, that the volunteer has been verified and can start working with children, in the relevant role.
10. In the case where a volunteer or visitor to school is exempt from a WWCC, the staff member responsible must seek written permission from the relevant HOD and complete a Risk Assessment prior to the day of the visit.

### **5.5.3 Engagement of Property Contractors**

#### **Policy**

The Property & Maintenance Manager will require all contractors who have been engaged to complete work at the School to read the document "Site Safety for Contractors" and then complete a checklist. This will include collecting information about the contractor's WWCC number. Where possible, this work will be scheduled for non-teaching days or periods.

#### **Procedures**

1. The Business and Compliance Officer will email the contractor a copy of the document "Site Safety Information for Contractors" prior to commencement of work at the School which includes a request for their WWCC number;
2. The contractor must comply with all aspects of this request including providing details of their WWCC Number and other safety requirements such as insurance prior to commencing work on site;
3. The Business and Compliance Officer will record details in The Register, the name of the contractor, the type of work being done, the expected dates on site and the contractor's WWCC Number and expiration date;
4. The Office Manager will verify the WWCC.
5. The Business and Compliance Officer will notify the Property & Maintenance Manager once this has been completed as work may only commence once the verification has been completed;
6. If a contractor is used recurrently, the Property & Maintenance Manager will require the contractor to annually review the Site Safety Information for Contractor's information and check with the Business Officer that the WWCC Number is still current and verified, prior to them restarting work each time;
7. The Property & Maintenance Manager will require the contractor to renew their WWCC number, if necessary, prior to commencing work;
8. If a contractor is required in an emergency, and the WWCC verification cannot occur in the necessary timeframe, then the contractor will be accompanied at all times by a member of the Property staff whilst on site.

## **5.5.4 Engagement of Cleaners**

### **Policy**

The Business and Compliance Officer will ensure that all cleaners have a current and verified WWCC number by keeping an up to date record of verified numbers of all cleaners

### **Procedures**

1. The Business and Compliance Officer is responsible for annually (in Term 3) confirming that the WWCC numbers are verified.
2. Names of new cleaning staff must be provided to the Business and Compliance Officer by the cleaning contractor prior to their commencement of work;
3. The Office Manager will verify the WWCC prior to the commencement of work
4. The Business and Compliance Officer will maintain an up-to-date record of the name and WWCC number of all cleaners employed at the School.

## **5.5.5 Members of the School Board**

### **Policy**

The Business and Compliance Officer will ensure annually that all Board Members have a current and verified WWCC number by keeping an up to date record.

### **Procedures**

1. The Business and Compliance Officer is responsible for annually (in Term 1) confirming that all Board Members WWCC numbers are verified.
2. Names of new Board Members must be provided to the Business Officer by Business and Compliance Officer prior to their commencement;
3. The Office Manager will verify the WWCC prior to commencement.
4. The Business and Compliance Officer will maintain an up-to-date record of the name and WWCC number of all Board Members.

## **5.5.6 Peripatetic Music Tutors & External Clinical Professionals**

### **Policy**

The Office Manager is responsible for verifying the WWCC number of all Peripatetic Music Tutors and External Clinical Professionals prior to their commencement at the School. The Office Manager will maintain records of the expiration date, notify relevant staff (both the tutor/clinician involved and the coordinator) and ensure that an updated number is verified prior to the expiration date.

## Procedures

1. The Creative Arts Faculty Coordinator (or other relevant supervisor) will advise the Office Manager of the names of new Peripatetic Music Tutors/clinician via email including the WWCC Number;
2. The WWCC number is verified when the Office Manager receives it and before the tutor/clinician starts at the School;
3. For tutors/clinician, the verification status must read that the employee has a current paid WWCC number;
4. For any results other than 'the person may be engaged in any child related role', the Office Manager will advise the Principal immediately and appropriate action will be taken;
5. Once verification status has been cleared, the Office Manager will retain a copy of the verification, and the tutor/clinician's name will be added to The Register;
6. Additionally, the tutor/clinician must read the school's Child Protection Policy and sign a Staff Code of Conduct (tutors only).
7. The Office Manager will then advise the Music Coordinator or other relevant supervisor that the tutor/clinician has been verified and can start working with children in the relevant role.

### 5.5.7 The SGCS Staff Code of Conduct & Induction of Staff

#### Policy

The SGCS Staff Code of Conduct is applicable to all Staff (including paid staff and volunteers) and outlines the requirements of all Staff in the ways that they relate to children as part of their employment at the School. The SGCS Staff Code of Conduct is to be read in the context of expectations regarding professional relationships, ICT and social media, and alcohol, drugs and tobacco as outlined below. This is also to be read in conjunction with the Staff Policy and any requirements outlined in employment related documentation issued during the engagement, induction process or after this time by the School.

#### Procedures

1. At the point of employment at the School, the Office Manager will provide all paid Staff with a copy of the Child Protection Policy and the SGCS Staff Code of Conduct.
2. Prior to commencement at the School, the Staff member must sign to indicate they have read this policy and also provide a signed copy of the SGCS Staff Code of Conduct.
3. Upon commencement at the School, the staff member will participate in an induction program which will include specific instructions regarding the Child Protection Policy and the SGCS Staff Code of Conduct, including an opportunity to ask questions.
4. The Office Manager will ensure that the signed copy of the Code of Conduct is retained on the Staff Member's Volunteer's file.
5. Unpaid Staff will be required to complete the first two points above and will have the chance to ask questions of their Head of Department or Supervisor upon commencement at the School.

## **5.5.8 Expectations of Staff and Volunteers**

### **5.5.8.1 Monitoring adherence to the Code of Conduct**

Paid Staff, who the Principal reasonably believes, on the face of evidence, to have breached the SGCS Staff Code of Conduct or any part of this policy, may be stood down subject to the nature of the incident, the reliability of the evidence and/or pending the outcome of enquiries.

Voluntary Staff who the Principal reasonably believes, on the face of evidence, to have breached the SGCS Staff Code of Conduct or any part of this policy, may have their access to the School revoked.

### **5.5.8.2 Professional Relations with Students**

#### **Policy**

The School expects all Staff (which includes teaching staff, non-teaching staff, staff employed in other capacities, coaches and volunteers) to be caring, compassionate adults who take an interest in the well-being of students, and who set appropriate boundaries for worker-student relations. Staff, whether paid or voluntary, must be aware that their interactions with students are based on a trusting relationship arising from the nature of their role in the School, and that those relationships are open to scrutiny.

#### **Procedures**

1. At all times all Staff must treat students with respect and behave in ways that promote their safety, welfare and well-being.
2. At all times, Staff must conduct themselves in a professional manner towards students, consistent with their appointed role and remain within the boundaries of the Staff Code of Conduct.
3. Staff must not:
  - engage in inappropriate physical contact or force with a student including physical or corporal punishment of a child in the course of their role at the School.
  - act in ways which may cause a student to reasonably fear that unjustified force will be used against them, even if this is not their intention.
  - Intentionally behave in a manner which causes psychological harm to a student.
  - correct or discipline a student in excess of what is reasonable or appropriate for the situation.
  - act recklessly in regard to Behaviour Management.
  - engage in any conduct with students that could be reasonably construed as crossing professional boundaries. Inappropriate and overly personal or intimate relationships with conduct towards or focus on a student or group of students, would be considered as such. A single serious 'crossing of the boundaries' by a Staff Member, or persistent less serious breaches of professional conduct in this area, may constitute sexual misconduct.

- engage in conduct that is reflective of grooming behaviour in relation to a student, their family or friends.
  - make sexually explicit comments or engage in other sexually overt behaviour towards, or in the presence of a student.
  - have an intimate or romantic or sexual relationship with any student regardless of their age (it is irrelevant whether the relationship is consensual or non-consensual or condoned by parents).
  - commit a criminal offence involving a sexual element that is committed against, with or in the presence of a student or any child or children in any other circumstances.
4. When students or staff members leave the school, they must maintain a professional relationship with students. This includes:
    - no contact with any current or ex-student who is under 18.
    - no contact with any ex-student who has siblings that are still at the school.
    - ensuring that there is a break in the relationship between the student leaving school, and the establishment of an adult relationship.
    - ensuring that any post-school relationship is initiated by the student and not the staff member.
    - being aware that even though the student is now older, that the power-balance established by the teacher-student relationship is likely to remain and ensuring that any contact is sensitive to this dynamic.
    - being explicit about the ex-students that you are in contact with using the Disclosure form (see Appendix 2).
  5. Where there are existing personal relationships between a Staff member and a student, such as a family relationship or a close friendship, the Staff member must behave in a transparent and prudent fashion and be mindful of any perceived conflict of interest or purpose, ensuring that the Staff member does not breach any law, this policy, or any other relevant School policy. In these circumstances, the Staff member must notify their school of such relationships so that any potential or perceived conflict of interest may be carefully managed. For this purpose, annually, and as part of the annual Child Protection Training staff will be asked to complete and/or update the Disclosure Form (Appendix 7).
  6. Additionally, declarations must be made to the school, as soon as a situation becomes apparent after the Staff member comes into contact with the student outside of the school setting on a regular basis.
  7. The Director of Educational Compliance, under the direction of the Principal or HOD may follow up these disclosures to ensure that the staff member is taking reasonable steps to ensure professionalism and child safety in these contexts using a risk management approach.
  8. When an ex-student later becomes a staff member, the requirements of points 4-7 no longer apply, though it is still sensible for staff to be mindful that the power-balance established by the teacher-student relationship is likely to remain and to be sensitive to this dynamic.

### **5.5.9 Staff are Supported in Working at the School in a Child Safe Way**

#### **Policy**

Once engaged to work in any role at the School, Staff (paid and voluntary) are supported in their role in creating and maintaining a child safe culture at the School.

## Procedures

A range of procedures (which intersect significantly with Standards 6-7) are provided to support staff including:

1. Reminders about keeping their WWCC number up to date;
2. The School reimbursing paid staff for the renewal of WWCC number;
3. The clear communication of policy changes to staff (e.g. through Whole School Staff Meetings) or emails;
4. The availability of all policy documents to all staff via a link on TASS
5. The provision of Child Protection Officers who are available to discuss child protection matters at any time;
6. Annual training in Child Protection;
7. Leaders (the Principal, Heads of Departments, Directors and Subject Coordinators) providing strong guidance and support;
8. The Director of Educational Compliance being available to all Staff to clarify and direct the interpretation of legislation, regulation and policy regarding Child Protection.

### **5.6 Standard 6: Processes to Respond to Complaints of Child Abuse (or other Concerns) are Child-Focussed**

#### **Policy**

The School will respond to any allegation, complaint or disclosure of child abuse in a way which treats the needs of the child as paramount. They will be respectful of the privacy of the child and family involved whilst also ensuring compliance with all relevant regulations and reporting responsibilities. The School will support the child and their family through the process in a way which is pastoral and responsive to their individual needs.

Staff should be clear on the difference between Mandatory Reporting, which is about responding to, protecting and caring for the needs of the child in the case of suspected abuse; and Reportable Conduct Allegations which are allegations of abuse involving any paid or unpaid member of staff. Mandatory reporting matters are managed in the first instance by the relevant Head of Department and School Counsellor whereas all cases of Reportable Conduct Allegations are directly handled by the Principal.

#### **5.6.1 Mandatory Reporting**

#### **Policy**

Child abuse and neglect can happen to any child or young person in any family and can have lasting, damaging effects. This government resource ([https://www.childabuseroyalcommission.gov.au/sites/default/files/AG.DIBP.02.0033.001.0178\\_R.pdf](https://www.childabuseroyalcommission.gov.au/sites/default/files/AG.DIBP.02.0033.001.0178_R.pdf)) provides guidance for all staff in recognising signs of potential abuse<sup>2</sup>.

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<sup>2</sup> Further information can be accessed <https://www.facs.nsw.gov.au/families/Protecting-kids/reporting-child-at-risk/harm-and-neglect>

Protecting children and young people from all forms of abuse and neglect is the responsibility of the whole community at the School. This involves all Staff (whether paid or voluntary) adhering to Mandatory Reporting procedures in the case of any case of reasonably suspected case of child abuse. The School will support staff in these responsibilities.

### **Who is a Mandatory Reporter?**

1. All Teaching Staff, Counsellors, and the Principal are classified as Mandatory Reporters.
2. The law also considers any person who manages an employee or volunteer from such services as a Mandatory Reporter.
3. Mandatory Reporters are required by law to report to NSW Department of Communities and Justice if they suspect that a child is at risk of significant harm or child abuse via the Mandatory Reporter Guide (MRG).

### **Procedures**

Please note: Mandatory Reporters should consult the Mandatory Reporter Guide (MRG) [<https://reporter.childstory.nsw.gov.au/s/mrg> ] for further information about how to report a suspected case of abuse or at Risk of Significant Harm.

1. If a child **discloses** information about abuse:
  - o Remain calm and supportive;
  - o Be aware of the common indicators of abuse and neglect;
  - o Actively listen to the student but never probe for details or ask leading questions;
  - o Refrain from questioning excessively even if unsure of whether to notify;
  - o Talk gently and reassuringly, pointing out that you are there to help;
  - o Only ask open-ended questions that are designed to provide sufficient information about whether the suspicion of abuse is reasonable and, therefore, sufficiently strong enough to warrant a report being made, without suggesting the complaint is not believed;
  - o Where the abuse is taking place outside the School's control, never assure the student that the abuse will stop as that cannot be guaranteed;
  - o Do not make promises that you will not tell anyone. In fact, you should disclose that you have a responsibility to tell the Head of Department or Principal and the relevant government department.
2. If a student begins to make a **disclosure in a group situation** involving other students:
  - o Acknowledge you have heard the student;
  - o Indicate support by explaining that what the student has said sounds important and that it would be better to talk about it later;
  - o Immediately yet discretely arrange an appropriate time to see the student away from other students.
3. If a student makes a disclosure after hours, either via email or some other means, the Staff member should:
  - o attempt to immediately contact their Head of Department to establish whether there is a 'Risk of Significant Harm' (Heads of Departments should

- make their mobile numbers available to staff, so they are contactable in this situation);
- If their Head of Department is not available, the staff member could try to contact another Head of Department, one of the School's Counsellors or the Principal;
  - If they believe there is imminent 'Risk of Significant Harm', they should contact the Police immediately then follow up the next school day using the processes as outlined below.
4. If a Staff member suspects a case of abuse or that a student may be at Risk of Harm (see p.20), they should report this to their Head of Department or School Counsellor.
  5. The Head of Department or School Counsellor or delegate will then make a record that there is a risk of harm in the Wellbeing Module in TASS or elsewhere as advised
  6. The Staff member to whom the disclosure has been made, with the support of their Head of Department and/or School Counsellor, will make an assessment using the online Mandatory Reporter Guide as to whether the matter has a Significant Risk of Harm and is therefore reportable to the Department of Communities and Justice or whether the matter is of a lower threshold.
  7. In the case where a matter is reportable, due to it being determined as Significant Risk of Harm, the Staff member to whom the disclosure has been made will make a report using the online MRG tool supported by their Head of Department or School Counsellor, including providing any details or assistance as may be requested or mandated from the Department of Communities and Justice or other government agencies.
  8. If the matter involves a crime, the Principal or delegate or Head of Department will report the matter to the Police.
  9. It is imperative that the interests of the child and the possible risk of harm are considered paramount in relation to any confidentiality requirements. Staff who have access to information regarding suspected or disclosed child sexual abuse or physical abuse are to observe strict confidentiality in relation to the entire matter, unless required on reasonable grounds by the Principal to disclose that information. Where it might be considered to be in the interest of a child, who may be at risk of harm, to disclose confidential information to a parent caregiver or agency, the Staff member should seek advice from the Principal. The Principal may then advise the Staff member on the appropriate course of action or directly action the matter.
  10. In the case where the matter is deemed **not** to be a 'Risk of Significant Harm', the Head of Department or School Counsellor will:
    - i) Ensure a record of the determination, including a printout from the Mandatory Reporters online Guide, is attached electronically to the Wellbeing report in TASS and marked confidential, and a physical copy placed on the student's file held by the School Counsellors;
    - ii) Ensure that the Staff member making the report is notified, if they do not already know about the outcome;
    - iii) Ensure that appropriate measures are put in place to maintain the relationship between the relevant staff member and student and for the Staff member to monitor the situation;
    - iv) Refer the matter to another organisation which may be able to assist in the matter, if necessary.
  11. If Significant Harm is indicated after following the steps in the MRG, the Head of Department, School Counsellor or Staff member may contact the Child Protection

Helpline on 132 111 for additional support or advice, once the online report has been made.

12. If a report is made to the Department of Communities and Justice (DCJ), then the Head of Department or the School Counsellor must notify the Principal that day.

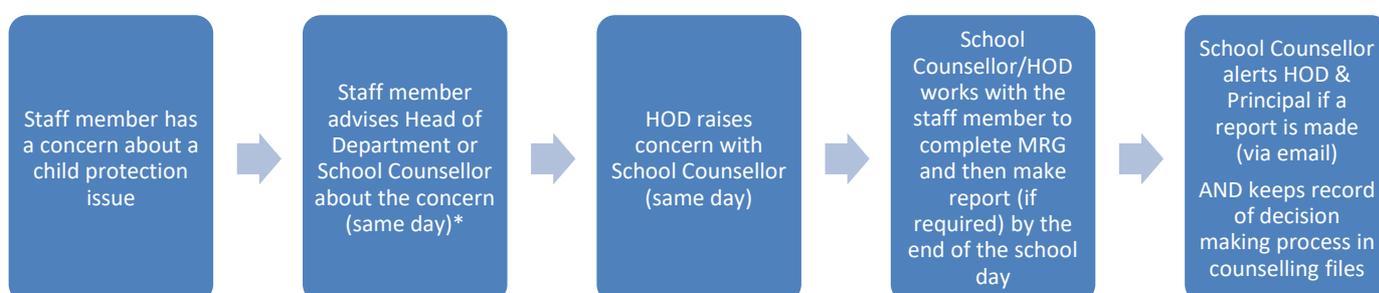
## Risk of (Significant) Harm

A child is at *Risk of Significant Harm* if current concerns exist for the safety, welfare or well-being of the child or young person because of the presence, to a significant extent, of any one or more of the following circumstances:

- the child's basic physical or psychological needs are not being met or are at risk of not being met;
- the parents or other caregivers have not arranged and are unable or unwilling to arrange for the child to receive necessary medical care;
- in the case of a child who is required to attend school in accordance with the Education Act 1990—the parents or other caregivers have not arranged and are unable or unwilling to arrange for the child to receive an education in accordance with that Act;
- the child has been, or is at risk of being, physically or sexually abused or ill-treated;
- the child is living in a household where there have been incidents of domestic violence and, as a consequence, the child is at risk of serious physical or psychological harm;
- a parent or other caregiver has behaved in such a way towards the child that the child has suffered or is at risk of suffering serious psychological harm;
- the child was the subject of a pre-natal report under Section 25 and the birthmother of the child did not engage successfully with support services to eliminate, or minimise to the lowest level reasonably practical, the risk factors that gave rise to the report.

What is meant by "significant" in the phrase "to a significant extent" is that which is sufficiently serious to warrant a response by a statutory authority, irrespective of a family's consent. What is significant is not minor or trivial and may reasonably be expected to produce a substantial and demonstrably adverse impact on the child's safety, welfare, or wellbeing. In the case of an unborn child, what is significant is not minor or trivial and may reasonably be expected to produce a substantial and demonstrably adverse impact on the child.

## Mandatory Reporting Flowchart for Staff



\* if a disclosure is made out of school hours, the Staff member should follow the procedure as outlined in 5.6.1, point 3.

### **5.6.3 Reportable Allegations**

Reportable Allegations are allegations of Reportable Conduct against an employee.

#### **5.6.3.1 What is Reportable Conduct?<sup>3</sup>**

The following conduct, whether or not a criminal proceeding in relation to the conduct has been commenced or concluded, is Reportable Conduct:

- (a) a sexual offence;
- (b) sexual misconduct;
- (c) ill-treatment of a child;
- (d) neglect of a child;
- (e) an assault against a child;
- (f) an offence under Section 43B or 316A of the Crimes Act 1900 (failure to reduce or remove risk of child becoming victim of child abuse (43B) and concealing child abuse offence (316A));
- (g) behaviour that causes significant emotional or psychological harm to a child.

Reportable Conduct does not extend to:

1. Conduct that is reasonable for the purposes of the discipline, management or care of children, having regard to the age, maturity, health or other characteristics of the children and to any relevant codes of conduct or professional standards; or
2. The use of physical force that, in all the circumstances, is trivial or negligible, but only if the matter is to be investigated and the result of the investigation recorded under workplace employment procedures; or
3. Conduct of a class or kind exempted from being reportable conduct by the Children's Guardian.

#### **5.6.3.2 Making/Receiving Reportable Allegations**

##### **Policy**

The Principal, as the Head of the relevant Entity, will receive Reportable Allegations from any member of the School community. Staff should direct students to the Principal if they make disclosures that include allegations of Reportable Conduct. Any Reportable Allegation against the Principal should be made directly to the OCG.

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<sup>3</sup> Definition from [https://ocg.nsw.gov.au/sites/default/files/2022-02/FS\\_RC\\_identifying\\_reportable\\_allegations.pdf](https://ocg.nsw.gov.au/sites/default/files/2022-02/FS_RC_identifying_reportable_allegations.pdf)

## Procedures

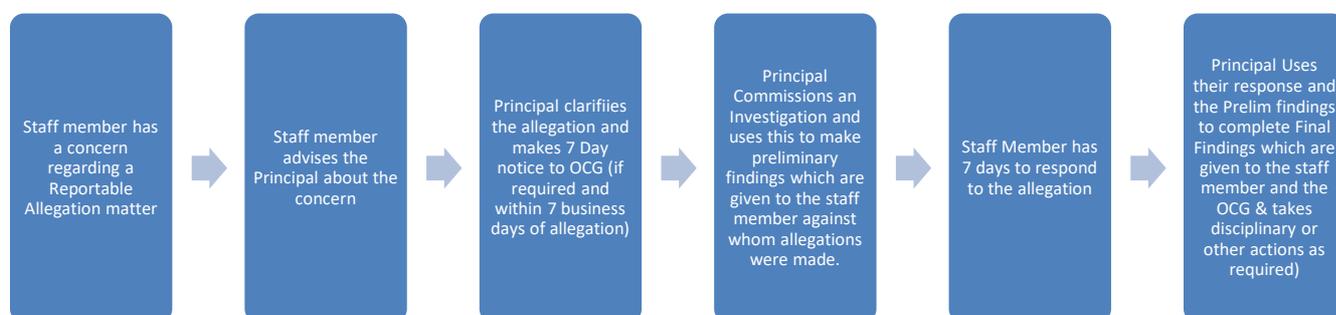
### Investigating Reportable Allegations and Notifying the OCG

1. Any reasonable allegation of Reportable Conduct of a member of Staff must be reported immediately to the Principal (prior to leaving work on the day that it was disclosed to them). The staff member should contact the Principal's EA alerting them of the need to make a Reportable Conduct allegation – who will then ensure that they can speak to the Principal that day. The Principal will clarify the information to ascertain whether the complaint or information constitutes an allegation of Reportable Conduct. This decision should be made as soon as the allegation is received so that an investigation into the matter can commence and be concluded in a timely manner.
2. Clarification may be sought as to the nature of the alleged behaviour, from the person making the allegation. Any enquiry beyond this would constitute an investigation. Such clarification may be necessary to establish:
  - The identity of persons involved;
  - When and where the alleged incident occurred;
  - A description of the reportable acts and/or omissions which form the basis of the allegation.
3. If the allegation is deemed to be an allegation of Reportable Conduct, the Principal will notify the OCG within seven (7) business days after becoming aware of the allegation or conviction of Reportable Conduct by submitting a seven days' notice form to the OCG.
4. The Principal will then appoint trained investigators to carry out investigations in relation to allegations of Reportable Conduct. The School has a service agreement through Christian Schools Australia for Halloran Morrisey to provide this service.
5. The investigation will occur efficiently and with respect to the privacy of all those involved. If the final report is not ready to submit within 30 calendar days the Principal must provide an interim report, with information about the progress of the investigation and expected timeframe for completion to the OCG.
6. The results of such investigations will be reported to the Principal who will make a preliminary finding in light of the facts.
7. The Principal will then inform the employee of the preliminary finding of the investigation.
8. The employee will be afforded the opportunity to respond to the finding in writing within seven days.
9. Upon receipt of the Staff member's response or after seven days, the Principal will make a Final Finding in relation to the allegation and:
  - Inform the employee of the Final Finding;
  - Submit an Entity Report to OCG within 30 days of becoming aware of the allegation or conviction of reportable conduct;
  - Ensure that any disciplinary proceedings in relation to the employee are carried out.
10. Where the Principal reasonably concludes, after reviewing the evidence, that an act of abuse has taken place or the Staff Code of Conduct has not been complied with, or a loss of confidence in a member of staff exists, the Principal may summarily

dismiss a Staff member from employment at the School. This action may occur irrespective of whether a conviction has been determined by a Court of Law<sup>4</sup>.

11. Such investigations and the accompanying reports to the Office of the Children's Guardian (OCG) must be done under the direction of the Principal unless the allegation is made against the Principal, in which case the OCG will oversee the investigation.
12. Allegations will be investigated in a confidential manner.
13. No Staff member or student will be disadvantaged because of having complained/disclosed information regarding a reportable conduct allegation.
14. Penalties apply for failure to comply with the seven business day notification requirements and the 30 calendar day interim/final report.

### Reportable Allegations Flowchart



### 5.6.3.3 Reporting Obligations for School Community Members

1. Child Protection laws require all Staff Members who are engaged in child-related work (or who are otherwise not exempt) to have completed a Working With Children Check and to report certain matters of concern in relation to students, including:
  - Informing the School if they are charged with or convicted of an offence relevant to working in child-related employment, or if they have had any reportable allegation made against them;
  - Reporting to the School any allegations or convictions of Reportable Conduct involving any Staff (whether paid or voluntary);
  - Reporting to the School any information or concerns about inappropriate behaviour by any Staff Member that involves a student;
  - Fulfilling their legal obligation to report risk of significant harm, or to report possible criminal activity, in accordance with local procedures; and
  - Maintaining confidentiality of all parties concerned.
2. In any matter where a Staff Member is in doubt as to the privacy requirements, they should seek the advice of their Head of Department or the Principal.
3. Staff must not take detrimental action against the complainant or person who reported the information. This includes any action that could reasonably be

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<sup>4</sup> See Schedule 1 of Child Protection Act 2012 – in 1(a)  
<https://www.legislation.nsw.gov.au/view/html/inforce/current/act-2012-051#sch.1>

perceived to be detrimental action in reprisal. To do so may be regarded as serious misconduct and may result in disciplinary action.

### **5.6.3.4 Record Keeping**

#### **Policy**

The School will keep effective records of all Child Protection issues, whether they are related to Mandatory Reporting or Reportable Allegations, which respects the privacy of those involved and the gravity of these matters.

#### **Procedures**

1. Accurate documentation should be kept by all parties (including the Staff member to whom the disclosure was made) concerning any reports made about possible child sexual abuse, physical abuse or psychological abuse, details of notification, actions taken within the School resulting from notification and other details related to reported cases of abuse.
2. Information relating to the handling of all Reportable Allegations including enquiries, investigations, findings, decisions and action taken will be retained indefinitely by the School, by the Principal's EA (in digital form, as detailed in the School's Record Keeping Policy). These will be treated as a Confidential Record;
3. A Staff Member to whom any disclosure has been made:
  - o Has a responsibility to create and maintain appropriate records of their professional activities and decisions in the care and protection of students, including contemporaneous records of any disclosure, observations and discussions including any breach of this Policy;
  - o These records may be in the form of notes in their diary or daybook, an email to their Head of Department or an electronic file;
  - o Must remain mindful of the need to retain such records securely and confidentially; and
  - o Should pass these records onto Head of Department once the matter has been resolved or at the end of the school year.
4. All records regarding Mandatory Reporting will be retained by the School Counsellors.

### **5.6.3.4 Exchange of Information**

#### **Policy**

The School will only disclose information regarding child protection within the boundaries allowed by the *Children's Guardian Act, 2019*. This will only be done when the sharing of such information is legally required (such as in the case of Mandatory Reporting to the Department of Communities and Justice or Reportable Conduct to the OCG) and relates to the safety, welfare and wellbeing of the child. The decisions are the responsibility of the Principal (in the case of Reportable Conduct) and the Principal, Head of Department or School Counsellor (in the case of Mandatory Reporting).

## **5.7 Standard 7: Staff are Equipped with the Knowledge, Skills and Awareness to Keep Children Safe Through Continual Education and Training**

### **Policy**

The Principal will ensure that all Staff are informed annually, through annual Child Protection Training about:

- the legislative requirements regarding Child Protection;
- the School's processes regarding Mandatory Reporting;
- indicators of child abuse;
- their obligations with regards to the School's Code of Conduct and other School expectations;
- the process the School will employ upon the receipt of a Reportable Allegation.

Other ongoing training of Staff will occur throughout the year through:

- online training offered by the OCG or another appropriate organisation;
- department or faculty meetings;
- external training and support required by Staff who are in particular frontline roles with students (for example, School Counsellors, Year Advisers and Student Support staff).

### **Procedures**

- In Term 1 of each year the School will conduct annual Child Protection training where all Staff (paid and voluntary) will be informed of their responsibilities and the School's processes regarding child safety – there will be one for paid staff and one for volunteers.
- The Principal's PA will maintain records of regular staff training regarding Child Protection;
- The School will promote and facilitate additional training for Staff who have particular responsibility for child safety as required (including Year Advisers, Homeroom Teachers, Heads of Departments and School Counsellors);
- Staff new to the School will be inducted into the School's approach to Child Protection through the process outlined in the Staff Policy;
- Individual support (through the Heads of Departments and the School's EAP) is available upon request for any Staff member who is navigating a challenging child safety issue.

## **5.8 Standard 8: Physical and Online Environments Minimise the Opportunity for Abuse or Other Kinds of Harm to Occur**

### **5.8.1 Physical Environments**

#### **Policy**

The physical School environment will be carefully maintained as a safe space for all children who attend. This will include ensuring visibility, transparency and professionalism in all physical interactions between Staff (whether paid or voluntary) and students. It will also include ensuring the physical safety of the site through ongoing maintenance and WHS.

### **5.8.1.1 Safety of Physical Spaces**

- The Property & Facilities Manager will ensure that the School facilities are maintained in a safe way and in accordance with the annual maintenance schedule;
- The School's process and policy around Work, Health and Safety (see separate policy) and especially through the work of the WHS Committee promote a safe physical environment for students
- It is the responsibility of all Staff to ensure that all classrooms and other spaces used by students, are in a condition which is safe for them prior to entering the space and for reporting any emergency safety issues which may need to be addressed with the Property Team;
- Staff will ensure they are not in any space alone with a student unless absolutely necessary. If this occurs, they should ensure that blinds and doors as required are open so that transparency is maintained.
- All staff at the school, whether paid or unpaid will wear a lanyard, name badge, sticker, uniform or other identifier to ensure that adult members of the community are quickly and physically identifiable. It is the responsibility staff members should question any adult on site who is not wearing such an identifier.

### **5.8.1.2 Alcohol, drugs and tobacco**

#### **Policy**

No illegal substances will be brought to the School, used by Staff or provided to the students at the School.

#### **Procedures**

1. Staff will not purchase for, offer, supply, give or administer to a student, including those over the age of eighteen years, illegal drugs, restricted substances, prescribed or non-prescribed medication (unless dealing with or administering medication in accordance with relevant policy), alcohol, vapes and/or tobacco.
2. Staff will not encourage or condone the use by a student of illegal drugs, restricted substances, alcohol, vapes and/or tobacco.
3. Staff will not consume illegal drugs, restricted substances, alcohol or tobacco on School premises or at any school-related activity where a student is present, except in the case of alcohol and where it is an offsite event and explicit permission is given by the Principal.
4. Where a staff member receives an alcoholic beverage as a gift, it should be taken offsite on the day it is received.

### **5.8.1.3 Visitors**

#### **Policy**

All visitors to the School will be subject to Child Protection measures. Visitors include contractors conducting work on School grounds. A visitor is a guest invited by a Staff member to the School.

## **Procedures**

1. All visitors to the School must report to the Main Reception Office or Infants Office on arrival to and departure from the School and must sign in and provide visitor identification. Visitors will be issued with a visitor pass which is to be clearly displayed whilst at the School.
2. Visitors must restrict their movement around the School to the area associated with the nature of their visit as identified during sign-in.
3. Staff working with the visitor should ensure that they do not have unsupervised access to students.
4. Any Staff member who has concern over the behaviour of a visitor should notify the relevant Head of Department or Principal immediately and should remain with the visitor until a suitable solution can be reached.

(for further details refer to the SGCS Visitor Policy)

### **5.8.2. Online Environments**

#### **Policy**

All Staff, whether paid or voluntary, will relate to students through all digital media (including email, social media and learning platforms) in a way that is professional, which avoids any hint of grooming behaviour and which is completely transparent.

All students will have access to digital environments which are safe and in which monitoring is used to ensure professional relationships between staff and students are promoted.

#### **Procedures**

##### **5.8.2.1 Social Media**

1. In relation to Social Media (which includes but is not limited to Facebook, WhatsApp, Snapchat, Instagram, X, Tumblr, Reddit and any other similar applications), staff should not have any current student as a friend, contact or follower.
2. There are, however, exceptional circumstances where, due to a pre-existing relationship outside of the school context, for example being a relative or Youth Leader in a church, a Staff member may need to maintain contact with students using social media. Staff should endeavour to find an alternative mode of communication before using Social Media as a way of being in contact with any current students only if they are 16 or older. If it is deemed necessary, the Staff member must declare this contact specifically in Declaration Form (Appendix 7).

##### **5.8.2.2 Learning Platforms & Email**

1. Teachers should only communicate with students one-to-one using their School email address or through TASS which can be monitored by the School.
2. Teachers are encouraged not to engage in one to one contact with students using Learning Platforms such as the LMS or Google Classroom. School email is a better

place for this type of contact, unless there is a sound educational reason for doing so.

3. All Teachers must ensure that all classes they create in any online learning platform have at least one additional teacher from their faculty or department as a co-teacher. This would normally be the Subject Coordinator or Head of Department.
4. This Teacher should regularly check the content of any discussions or forums to ensure that there are no potential issues.

### **5.8.2.3 Use of images or videos of students**

1. Staff should only photograph or film a student for purposes approved by the School (for example, for marketing purposes as approved by the Marketing Manager or an official photographer at a School event or as a record of learning in the classroom).
2. Secretly taking photographs or other images of students, retaining them for unjustifiable purposes, sending them to other persons or posting them online is strictly prohibited.
3. Parents sign a form upon being offered a place at the School, giving explicit permission as to how images taken while at the School or engaged in activities run by the School, may be used. Some parents explicitly require that photographs won't be taken of their child for marketing purposes. This information is recorded on TASS and staff must respect the limitations parents place on the use of images of their children.

### **5.8.2.4 Phones**

1. As a general principle, staff should not contact a student using their personal phone
2. Staff should not request that a student gives them their phone number.
3. If phone contact is necessary, in the context of a school excursion for example, staff members can request a general number, through ICT, to be directed to their phone for the purposes of students maintaining contact for the duration of the excursion. If staff are seeking to make contact with a student who has been separated, they should request a student to make the call unless student safety suggests otherwise.
4. Staff should disclose to their HOD, and note on a Risk Assessment, any time when students are given a staff member's phone number.

## **5.9 Standard 9: Implementation of the Child Safe Standards is Continuously Reviewed and improved**

### **Policy**

The Principal will endeavour to consult with Staff, community members and students, in the reviewing of this policy.

### **Procedures**

1. This policy will be reviewed in Term 1 of each year by the Principal and Heads of Departments.

2. Ideally, prior to this review, there should be formal and informal consultation with students, Staff and community members about the child safe culture of the School which will form the basis and shape of the review.
3. The Board will review this Policy annually, in Term 2, as part of their normal schedule.
4. The Director of Educational Compliance will update this policy as advised as a result of both of these reviews.

## **5.10 Standard 10: Policies and Procedures Document How the Organisation is Child Safe**

### **Policy**

The School will ensure that it maintains and updates regularly sound policies, procedures and record keeping in the area of child safety.

### **Procedures**

1. The School has a Statement of Commitment to Child Safety which is made publicly available (see Appendix 1).
2. The School has a Staff Code of Conduct which all Staff (paid and voluntary) agree to and sign prior to commencing work at the School.
3. The School takes a strong Risk Management approach to child safety (see separate Risk Management Policy).
4. The School is establishing a new digitised system of record keeping which will ensure privacy and security of all data and records held by the School (see separate Record Keeping Policy).
5. These policies and procedures are publicly available to all members of the School community on request.

## **6 CONGRUENCE WITH LEGISLATION AND RELATED POLICIES**

### **6.1 Legislation**

- Children's Guardian Act, 2019, NSW
- Child Protection (Working with Children) Act, 2012 – which regulates the checking of all people working with children through the WWCC process
- Child Protection (Working with Children) Regulation, 2013
- Children and Young Persons (Care and Protection) Regulation, 2012
- Child Protection (Working with Children) Amendment (Statutory Review) Act, 2018

### **6.2 Related School Policies**

- Anti-Bullying Policy
- Communications Policy
- Discipline Policy
- Risk Management Policy
- Staff Policy
- Student Support Policy
- Record Keeping Policy
- Visitor Policy
- WHS Policy

## 7 SOURCES

- A Guide to the Child Safe Standards (OCG Publication, 2020)  
[https://ocg.nsw.gov.au/sites/default/files/2021-12/g\\_CSS\\_GuidetotheStandards.pdf](https://ocg.nsw.gov.au/sites/default/files/2021-12/g_CSS_GuidetotheStandards.pdf)
- Child Centred Complaints Handling (Create Foundation,  
<https://create.org.au/wp-content/uploads/2020/07/Best-Practice-Guide-Complaints-Updated.pdf>)

## 8 CONSULTATION

The policy was prepared by the Director of Research Compliance and Accreditation in response to changes in legislation in 2020. Consultation occurred with the Principal and Heads and Department and other key stakeholders prior to the implementation of the policy in 2021.

## 9 REVIEW

See Section 5.9 in Policies and Procedures.

## 10 ACCOUNTABILITIES

### 10.1 RESPONSIBILITY

The Principal is responsible for the implementation of this policy. Within the Child Safe Standards every staff member is responsible for its daily practice.

### 10.2 IMPLEMENTATION PLAN

All Staff were inducted into the policy in Term 2, 2021 through a Whole School Staff Meeting and subsequent briefings for volunteers and other staff.

### 10.3 TRAINING PLAN

Ongoing training will be provided at least annually (in Term 1) to all Staff on the implementation of this policy.

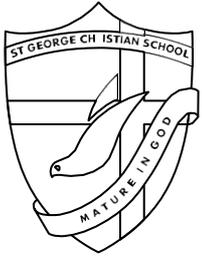
### 10.4 COMPLIANCE

The Principal is responsible for compliance with this policy.

## 11 POLICY ADVISER

The Policy Adviser for this policy is the Director of Educational Compliance.

## 12 FORMS



## Appendix 1 – SGCS’s Statement of Commitment to Child Safety

### St George Christian School’s Statement of Commitment to Child Safety

St George Christian School has developed the following Statement of Commitment to Child Safety as an overarching statement that provides key elements of our approach to protecting children from abuse and sets the tone for the School's entire approach to Child Protection.

It is designed to be St George Christian School's public statement of commitment to child safety and a demonstration of the School's leaders' commitment to champion child safety in our School.

It has also been approved and endorsed by the School Board and is regularly reviewed by them.

The Statement is published on our public website as well as communicated through other mediums such as the Annual Report, induction programs and a copy is given to all contractors, volunteers and other community members involved with or working in any capacity at the School.

### Objectives

This Statement provides the framework for:

- the development of work systems, practices, policies and procedures that promote child protection, safety and wellbeing within the School;
- the creation of a safe and supportive School environment and a positive and robust child safety culture;
- the promotion and open discussion of child safety issues within the School;
- complying with all laws, regulations and standards relevant to child protection in NSW.

### Statement of Commitment

St George Christian School's mission is to develop each person's character and gifts, for serving God and his people by promoting joy in learning, excellence in teaching and personal Christian faith and growth towards maturity.

The School is committed to ensuring the safety, welfare and wellbeing of all children at the School and is dedicated to protecting them from abuse and harm.

At St George Christian School, we have a zero tolerance for child abuse. The School regards its child protection responsibilities with the utmost importance, and as such is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations and to maintain safe and supportive School physical and online environments for all children and young people.

## Child Safe Standards

The 10 Child Safe Standards (<https://www.kidsguardian.nsw.gov.au/child-safe-organisations/training-and-resources/child-safe-standards>) guide the School's commitment to child safety and form the basis for all child protection policies and procedures at the School.

1. Child safety is embedded in institutional leadership, governance and culture
2. Children participate in decisions affecting them and are taken seriously
3. Families and communities are informed and involved
4. Equity is upheld and diverse needs are taken into account
5. People working with children are suitable and supported
6. Processes to respond to complaints of child sexual abuse are child-focused
7. Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training
8. Physical and online environments minimise the opportunity for abuse to occur
9. Implementation of the Child Safe Standards is continuously reviewed and improved
10. Policies and procedures document how the institution is child safe

## Child Protection Officers

As part of our commitment to child safety and protection, St George Christian School has appointed Child Protection Officers as honest, mature, ethical and experienced members of the School community who can deal with sensitive issues relating to child protection and safety.

Our Child Protection Officers:

Name	Position	Contact Number	Email Address
James Honor	Principal	02 9547 2311	principal@sgcs.nsw.edu.au
Abbey Leedow	Senior School Counsellor Yrs 9-12	02 9547 2311	abbey.leedow@sgcs.nsw.edu.au
Casey Buchanan	Middle School Counsellor Yrs 6-8	02 9547 2311	casey.buchanan@sgcs.nsw.edu.au
Danielle Thomson	Infants, Junior & Senior School Counsellor Yrs K-5	02 9529 8405	danielle.thomson@sgcs.nsw.edu.au

Our Child Protection Officers are available to answer any questions that you may have with respect to our Statement of Commitment to Child Safety and the Child Protection Policy.

## **Responsibilities**

The School acknowledges that child protection is everyone's responsibility. At St George Christian School, all directors of the School Board, staff members, volunteers, contractors and external education providers have a shared responsibility for contributing to the safety and protection of children and young people.

## **Reporting Child Protection Concerns**

Our Child Protection Policy provides detailed guidance for all members of the School community as to how to identify key risk indicators of child abuse and how to report child abuse concerns within the school setting. It also contains procedures with respect to the reporting of child abuse incidents to relevant external authorities.

Staff, volunteers, contractors, external education providers, students, parents/carers or other community members who have concerns that a child or young person may be subject to abuse are asked to contact one of the School's Child Protection Officers or any other staff member with whom they feel confident to speak with.

Communications will be treated confidentially on a 'need to know basis'.

Whenever there are concerns that a child is in immediate danger the Police should be called on 000.

## **Child Protection Policy**

St George Christian School is committed to the continuous improvement of our Child Protection Policy and to ensuring the School's compliance with NSW child protection law and regulation.

The Policy is annually reviewed for overall effectiveness and to ensure compliance with all child protection related laws, regulations and standards.

**James Honor, Principal**  
**St George Christian School**

## Appendix 2 - Existing Relationship Disclosure Form

As per Section 5.5.7.2 of Child Protection Policy, the school is aware that many staff members have existing personal relationships with students and their families outside of the school setting. These relationships generally fall into one of three categories:

- (a) family relationships
- (b) church relationships
- (c) relationships through their children

In this case it is very important that the school is aware of these relationships so that the risk can be managed if required.

To this end, staff must annually disclose, and update the following form to indicate the students and their families with which they have such a relationship.

Staff should be aware that the Director of Educational Compliance or HODs, under the direction of the Principal, may follow up such disclosures to confirm that reasonable strategies are in place to ensure Professional Integrity and Child Protection within these relationships.

Name of Staff Member: \_\_\_\_\_

Role at school: \_\_\_\_\_

Supervisor: \_\_\_\_\_

Name of Student and/or Family	Context of contact	Regularity of Contact	Nature of contact


To the best of my knowledge this is a full and frank disclosure of all students with whom I have regular contact outside of the school.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_