



CHILD SAFETY POLICY

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1 Introduction

1.1 Commitment to Child Safety

Our Child Protection Policy and Procedures sets out roles and responsibilities of staff in relation to child protection including training, reporting, support, monitoring, review and documentation while supporting the 5 Core Values of our College:

1. Christ Centred.

Here at Summerland, we believe students thrive best in a supportive Christian environment. That's why we strive to create a caring and faith inspiring setting built on God's love. We provide a supportive Christian environment. Colossians 2:2-3

2. Academic Achievement.

Here at Summerland, we are committed to helping our students achieve outstanding academic results. Our dedicated teachers pursue excellence through innovative approaches to learning and by helping our students achieve their best. We have proven academic success. Isaiah 40:31

3. Personalised Education.

Here at Summerland, we believe God has created every student with a unique set of gifts and distinctive potential. That's why we are committed to providing unique pathways for each individual, enriching their development whilst adding academic value to their lives. We seek God's wisdom beyond the earthly in our teaching approach. We value the individual. Ephesians 2:10

4. Partnering with Parents.

Here at Summerland, we believe that students excel when parents and teachers combine for a tailored and supportive approach to their education. That's why we facilitate and encourage parental insights and participation in each child's learning and academic progress. We encourage partnership with each family. Proverbs 22:6

5. The Living Word.

Here at Summerland, we stand on the Word of God and its scriptures as foundational and life transforming. We believe that the Bible is God breathed and our handbook for wise choices and joyful living. We acknowledge our dependence on the empowerment of the Holy Spirit to live as God intended. We are Bible based. Joshua 1:8

We are governed by the Biblical command love others as Jesus instructs us to do: "Love the Lord your God with all your heart and with all your soul and with all your mind.' This is the first and greatest commandment. And the second is like it: 'Love your neighbour as yourself.' All the Law and the Prophets hang on these two commandments."
Matthew 22:37-40



Our love for our neighbours is shown in many ways, through both our attitudes and deeds.

There are also situations and circumstances that require a higher level of sensitivity to the needs of the neighbours involved. Situations of special trust or those involving neighbours that possess characteristics, such as children and young people, that make them more vulnerable require a greater degree of care and prayer. As a Christian educational community we also have a responsibility to hold each other accountable for loving one other. Those involved in leadership must also be aware of and discharge their responsibilities as leaders for this task.

While focussing upon a number of specific areas in which we demonstrate our love for our 'neighbours' this document is not intended to detract from the importance of the broad commandment. Our love should be reflected in all we do. Laws, policies or guidelines cannot change the heart, and our love for our neighbours can only truly result from a heart that is overflowing with love for God.

Summerland Christian College is committed to promoting the safety, welfare and wellbeing of children and young people. This commitment is of paramount importance to Summerland Christian College in the education and care of children and young people every day.

Summerland Christian College has zero tolerance for all forms of child abuse and neglect and any form of child and young person mistreatment.

Summerland Christian College is committed to providing a child safe environment where children and young people are safe and feel safe. This commitment is to all students in our care.

Every employee, contractor and volunteer involved in Summerland Christian College is expected to understand the important and specific role he/she plays in contributing to the promotion of the safety, welfare and wellbeing of children and young people at Summerland Christian College. This will ensure that safeguarding children and young people is at the forefront of all we do and every decision we make.

1.2 Child Safe Standards

The Child Safe Standards recommended by the Royal Commission provide a framework for making organisations safer for children. The Standards have been accepted by the NSW Government and provide tangible guidance for organisations to create cultures, adopt strategies and act to put the interests of children first, to keep them safe from harm.¹

NSW Child Safe Standards are:

1. Child safety is embedded in organisational leadership, governance and culture.

¹ The NSW Office of the Children's Guardian has indicated that organisations in NSW that are implementing the National Principles for Child Safe Organisations will be simultaneously implementing the NSW Child Safe Standards.



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 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 organisation is child safe.

Summerland Christian College is committed to embedding the Child Safe Standards at the College. This policy, and expected practices outlined within, serves as one of several policies relevant to ensuring the College is implementing the Child Safe Standards at the College and contributes to the establishment of a child safe organisation.

1.3 Purpose

The purpose of the *Child Safety Policy* is to outline to employees, contractors and volunteers the expectations in relation to safeguarding matters involving children and young people.

1.4 Scope

This policy applies to all employees, regardless of their role at Summerland Christian College, contractors and volunteers engaged by the school. The term employee will be used throughout this policy document. This term is intended to capture all employees, contractors and volunteers engaged by Summerland Christian College.

Failure to comply with this policy will be viewed seriously by Summerland Christian College. For employees, a failure to comply with this policy may result in employment consequences, including termination.

For volunteers and contractors, a failure to comply with this policy may result in the ongoing engagement with the College to be reviewed.

2 Safeguarding Children and Young People

1.

The term safeguarding is a broad concept that captures the proactive and preventative steps the College takes to protect, care and educate children and young people, as well as the steps the College takes to respond to child protection concerns that require statutory reporting and response. A child protection response is part of safeguarding that focusses on protecting individual children or young people identified as being at risk of significant harm from child abuse or neglect.

The safety, welfare and wellbeing of children and young people at Summerland Christian College is the responsibility of all employees at the school. This includes:



- fulfilling mandatory reporting obligations.²
- all employees having a duty of care to ensure that reasonable steps are taken to prevent harm to students which could reasonably have been foreseen.

Mandatory Reporting

The Children and Young Persons (Care and Protection) Act 1998 (CYP Act) establishes mandatory reporting obligations to the Department of Communities and Justice (DCJ) when a child is at risk of significant harm (ROSH). The CYP Act³ defines a child or young person to be at risk of significant harm if a current concern⁴ exists for the safety, welfare or wellbeing of the child or young person because:

- the child's or young person's basic physical or psychological needs are not being met or are at risk of not being met, or
- the parents or carers have not arranged and are unable or unwilling to arrange for the child or young person to receive necessary medical care, or
- the parents or carers have not arranged and are unable or unwilling to arrange for the child or young person to receive an education in accordance with the Education Act 1990 (NSW), or
- the child or young person has been, or is at risk of being, physically or sexually abused or ill-treated, or
- the child or young person is living in a household where there have been incidents of domestic violence and, as a consequence, the child or young person is at risk of serious physical or psychological harm, or
- a parent or other carer has behaved in such a way towards the child or young person that the child or young person has suffered or is at risk of suffering serious psychological harm.

All teachers and other employees at Summerland Christian College who either wholly or partly provide health care, welfare, education, education and care services, residential, or religious services to children are considered to be mandatory reporters.

The CYP Act states that a mandatory reporter must, when they have reasonable grounds to suspect that a child (under 16 years of age) is at risk of significant harm, report to the Department of Communities and Justice (DCJ) as soon as practicable.

2.1 The School

In general, the College Principal or Heads of College (Head of Primary and Head of Secondary) will determine if a concern is required to be reported to DCJ's Child Protection Helpline and, where necessary, NSW Police.

² In line with the CYP Act and this Policy.

³ Section 23.

⁴ See section 2.3 below for definition.



Prior to making a report to the DCJ Child Protection Helpline, the College Principal or the Principal's delegate, will use the Mandatory Reporter Guide (MRG) to help decide whether a child is suspected to be at risk of significant harm (ROSH) and therefore if a report should be made to the Child Protection Helpline.

Summerland Christian College takes a centralised reporting approach to concerns relating to the safety, welfare or wellbeing of children and young people. That is, all concerns relating to the safety, welfare or wellbeing of a child or young person should be reported to the College Principal or Heads of College (Head of Primary and Head of Secondary) who will have access to all information that may be relevant to a child or young person and the assessment of the concern. The College Principal or Heads of College (Head of Primary and Head of Secondary) can then make a determination about reporting to DCJ.

The centralised reporting approach Summerland Christian College adopts, allows for the College Principal or Heads of College (Head of Primary and Head of Secondary) to:

- collect and hold information relating to a child or young person that may not reach the threshold of 'at risk of significant harm'.
- collate individual incidences or pieces of information relating to a child or young person that may amount to cumulative harm.
- have access to all necessary information and history of concerns relating to a child or young person when using the MRG and / or making a report to the Child Protection Helpline.
- co-ordinate and support the care and wellbeing of a child or young person, other children and young people involved or affected, and their families, regardless of whether a mandatory report is required or not.

2.2 Employees

Mandatory Reporting

If an employee believes on reasonable grounds⁵ that a child is at risk of significant harm, they must report this information to the College Principal or Heads of College (Head of Primary and Head of Secondary) and seek their advice on how to proceed.

1.

The College Principal or Heads of College (Head of Primary and Head of Secondary) may report the information to DCJ. The employee will be notified if the school makes a report to DCJ in relation to the concern they have raised so that they know their mandatory reporting obligations have been met. They will also be notified by College Principal or Heads of College (Head of Primary and Head of Secondary) if the concern has not been reported to DCJ so that they can determine if they would like to report the information to DCJ in the event they believe the concern suggests a child is at risk of significant harm.

⁵ See section 2.3 of this policy for definition.



If a child or young person is in immediate danger and the College Principal or Heads of College (Head of Primary and Head of Secondary) or next most senior member of staff is not contactable, employees should contact NSW Police on 000 if it is an emergency, and/or DCJ's Child Protection Line on 132 111. Following this, the employee should advise the College Principal or next most senior member of staff at the College as soon as possible.

Employees are not:

- to undertake any investigation of the matter.
- permitted to inform the parents or caregivers that a report has been made to DCJ and/or Police.

If an employee makes a mandatory report to DCJ they are expected to inform College Principal or Heads of College (Head of Primary and Head of Secondary) that they have done so, without delay and as soon as practicable.

Please note that relevant definitions of child abuse and neglect can be found below at the end of this section.

Other Child Safety Concerns

As part of Summerland Christian College's overall commitment to safeguarding children and young people, all employees, regardless of their mandatory reporting status, are required to report any child safety concern or any other information relating to the safety, welfare or wellbeing of a child or young person (or a group of children and young people) to College Principal or Heads of College (Head of Primary and Head of Secondary).

These concerns should be reported regardless of how serious or minor the employee perceives, assesses or interprets the information to be. That is, even if an employee considers a concern not to be risk of significant harm (ROSH), the statutory threshold for reporting to the Child Protection Helpline, the concern should still be reported to the College Principal or Heads of College (Head of Primary and Head of Secondary) in line with this policy and the centralised reporting requirements outlined above at section 2.1. If an employee is unsure their information requires reporting, the employee should seek advice from the College Principal or Heads of College (Head of Primary and Head of Secondary).

Information relating to the safety, welfare or wellbeing of children or young people may relate to settings other than at Summerland Christian College. Other settings may include the online environment or outside of the school context including the child or young person's home.

The College Principal or Heads of College (Head of Primary and Head of Secondary) will be able to assist the employee in understanding their concerns and managing the next steps, as appropriate, and clarifying their role in the particular matter.

Responsible and early sharing of information relating to the safety, welfare and wellbeing of children and young people is fundamental to the school's approach to safeguarding.



If the concern involves the College Principal, a report should be made to the Chair of College Board.

2.3 Definitions Relevant to Safeguarding Children and Young People ⁶

Neglect

Neglect is when a parent or caregiver cannot regularly give a child the basic things needed for his or her growth and development, such as food, clothing, shelter, medical and dental care, adequate supervision, and enough parenting and care.

Neglect can be episodic and related to a particular event in a family's life, or it can be persistent where the parent repeatedly fails to meet their child's needs and protect them from harm. Neglect can have serious, detrimental effects on the child's social, psychological, educational and physical development.

Sexual abuse

Sexual abuse is any sexual act or threat impacting on a child, including unwanted sexual acts. Sexual abuse includes comments, physical contact, exposure to adult sexual activity and exposure to or involvement in sexual imagery.

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 or young people are bribed or threatened physically and psychologically to make them participate in the activity. Sexual abuse is a crime.

Physical abuse

Physical abuse is a non-accidental injury or pattern of injuries to a child or young person 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. The application of any unreasonable physical force to a child is a crime in NSW. For example, hitting a child or young person around the head or neck, or using a stick, belt or other object to discipline or punish a child or young person (in a manner that is not trivial or negligible) may be considered a crime.

Emotional abuse or psychological harm

Serious psychological harm can occur where the behaviour of their parent or caregiver damages the confidence and self-esteem of the child or young person, resulting in serious emotional disturbance or psychological trauma.

⁶ Further information relating to the definitions can be found at:

<https://www.facs.nsw.gov.au/families/Protecting-kids/reporting-child-at-risk/harm-and-neglect>



Although it is possible for 'one off' incidents to cause serious harm, in general it is the frequency, persistence and duration of the parental or carer behaviour that is instrumental in defining the consequences for the child or young person.

This can include a range of behaviours such as excessive criticism, withholding affection, exposure to domestic violence, intimidation or threatening behaviour.

Family violence

Family violence often includes multiple forms of abuse, such as physical, sexual and emotional. Emotional abuse is connected to family violence when a child has been, or is being exposed to the violence and that exposure has, is or would cause them significant harm. This exposure includes:

- seeing the violence,
- hearing the violence,
- seeing the consequences of family violence such as property damage, injuries to those involved including the emotional impact on the victim, or Police visiting the home.

Reasonable grounds

Reasonable grounds refer to the need to have an objective basis for suspecting that child or young person may be at risk of significant harm, based on:

- firsthand observations of the child, young person or family,
- what the child, young person, parent or another person has said or disclosed,
- what can reasonably be inferred based on professional training and/or experience.

It does not mean that there needs to be confirmation of suspension or proof before making a report.

Current Concerns

Current concerns are when there is significant harm arising from abuse or neglect that:

- is recent,
- is likely in the foreseeable future should circumstances continue unchanged,
- is from a child or young person having contact with someone who is known to be responsible for causing harm to a child in the past,
- refers to situations where the abuse or neglect of the child or young person occurred sometime in the past but continues to have an impact on the child or young person's safety, welfare or wellbeing.

Child

A child means a person who is under 16 years old.

Young Person

Young person means a person who is 16 years old or older, but not yet an adult.



Mandatory Reporters

Mandatory reporters include persons who:

- in the course of their employment, wholly or partly, deliver services including health care, welfare, education, children's services (education and care), residential or religious, to children; or
- hold a management position in an organisation, the duties of which include direct responsibility for, or direct supervision of, the provision of services including health care, welfare, education, children's services, residential or religious services, to children.



3 The Reportable Conduct Scheme

The Children Guardian's Act 2019 (CG Act) establishes the reportable conduct scheme in NSW. The Office of the Children's Guardian (OCG) has oversight of the reportable conduct scheme in NSW.

The reportable conduct scheme is focused on both preventing and responding to abuse of children by employees in certain organisations. This includes paid employees, volunteers and contractors delivering services to children.

The reportable conduct scheme is allegation based. The threshold for making a notification to the Office of the Children's Guardian is that a reportable allegation⁷ has been made. That is, there is an allegation that an employee has engaged in conduct that may be reportable conduct or that they are the subject of a conviction that is considered a reportable conviction⁸. A reportable conviction⁹ means a conviction (including a finding of guilt without the court proceeding to a conviction), in NSW or elsewhere, of an offence involving reportable conduct.

Reportable Conduct¹⁰

Reportable conduct includes:

- a sexual offence committed against, with or in the presence of a child,
- sexual misconduct with, towards or in the presence of a child,
- ill-treatment of a child,
- neglect of a child,
- an assault against a child,
- an offence under s43B (failure to protect) or s316A (failure to report) of the Crimes Act 1900, and
- behaviour that causes significant emotional or psychological harm to a child.

Child

A child is any person aged under 18 years old at the time the alleged conduct occurred. It is important to note, that this could include children who are not students of Summerland Christian College.

⁷ Section 18 of the CG Act.

⁸ Section 19 of the CG Act.

⁹ Section 19 of the CG Act.

¹⁰ Section 20 of the CG Act.



What is not reportable conduct¹¹

Reportable conduct does not include:

- conduct that is reasonable for the purposes of discipline, management or care of a child, having regard to:
 - the age, maturity, health or other characteristics of the child, and
 - any relevant code of conduct or professional standard.

An example would be a school teacher raising his or her voice in order to attract attention or restore order in a classroom

- the use of physical force if in all the circumstances, the physical force is trivial or negligible and the circumstances in which it was used have been investigated and records kept.

Examples include:

- touching a child in order to attract the child's attention,
 - momentarily restraining a child to prevent the child hurting themselves or others,
 - touching a child to guide or comfort the child.
- conduct of a class or kind exempted from being reportable conduct by the Children's Guardian under section 30.

3.1 The School

Reporting and Investigation Obligations

Summerland Christian College must notify reportable allegations or convictions relating to child-related misconduct by an employee to the OCG.

The College Principal, or nominated delegate, must notify the OCG within 7 business days of becoming aware of a reportable allegation or conviction against an employee of the school. This will be done by submitting a 7 Day Notification Form located on the OCG website.

It is important to note that Summerland Christian College must notify the OCG about reportable allegations and convictions against employees that arise in the course of an employee's work as well as reportable allegations and convictions relating to alleged conduct that occurred outside of school hours or outside of school related activities.

The school will then, as soon as practicable, conduct an investigation into the reportable allegation or conviction or will engage a third-party investigator to conduct the investigation on the school's behalf (see procedures below). The investigation will be completed within a reasonable time, having regard to the principles of procedural fairness and the mandatory considerations outlined in the CG Act.¹²

¹¹ Section 41 of the CG Act.

¹² Division 6 of the CG Act.



The College Principal, or nominated delegate will, by 30 calendar days after the College Principal, or nominated delegate, becomes aware of the reportable allegation or conviction, provide either a finalised entity report¹³ or an update¹⁴ on the investigation to the OCG.

The College Principal, or nominated delegate, will make a finding at the end of the investigation. The College Principal or nominated delegate, will make a decision regarding what action, if any, is required in relation to the employee, the child/children or any other parties who may have been involved in the investigation.

If the reportable allegation or conviction is against the College Principal, the matter will be handled by the Chair of the College Board, or the College Chair's nominated delegate.

Other Agency Reporting Obligations

The College Principal or Heads of College (Head of Primary and Head of Secondary), upon receipt of a reportable allegation or conviction, must also consider what other reporting obligations may be required in relation to the information.

Some reportable allegations also require reporting to:

- NSW Police
- DCJ.

If NSW Police and/or DCJ make inquiries in relation to the information received, those inquiries take priority over the reportable conduct investigation required by the school. As such, the reportable conduct investigation will not progress until clearance from NSW Police and/or DCJ has been received.

The school will also consider other agencies, for example NSW Education Standards Authority (NESA), who may require notification in relation to the reportable allegation or conviction and may seek appropriate advice as to the school's requirement to notify other agencies.

Managing Risk in Reportable Conduct Matters

The College Principal or Heads of College (Head of Primary and Head of Secondary) will be responsible for managing risk to the relevant parties associated with a reportable conduct matter. These include, but are not limited to:

- The child or group of children identified as the alleged victims
- Other children or young people
- The employee subject of the allegation
- Other parties to the alleged incident (such as witnesses or reporters)
- The investigation
- The school.

¹³ [Entity Report Form \(nsw.gov.au\)](https://www.nsw.gov.au)

¹⁴ [30-Day Interim Report Form \(nsw.gov.au\)](https://www.nsw.gov.au)



The College Principal or Heads of College (Head of Primary and Head of Secondary) will conduct a risk assessment for each of the identified relevant parties in the reportable conduct matter and will document the risk assessments. These risk assessments will be conducted:

- at the time of receiving the reportable allegation
- during the investigation, or as appropriate, to ensure they consider and, where appropriate, adjust the investigation, as new information becomes known, and
- at the conclusion of the investigation.

The College Principal or Heads of College (Head of Primary and Head of Secondary) is also expected to review and update risk assessments for the relevant parties to the investigation as and when new information comes to light during the course of the investigation, particularly when that new information changes the risk to any of the relevant parties involved.

Risk assessments must be documented and kept on the investigation file and are to be included in the information provided to the OCG to demonstrate the school is managing risk.

Please note, the Principal's decision to take action on the basis of a risk assessment is not suggestive of a finding. For example, if an employee is asked to take leave or is suspended from duties for the duration of the investigation, this decision does not suggest a finding has been made. This decision is a decision based on an assessment of risk to all parties involved.

Other Obligations

The College Principal or Heads of College (Head of Primary and Head of Secondary) is also required to:

- ensure systems are in place for preventing, detecting and responding to reportable allegations or convictions at Summerland Christian College.
- provide information about the allegation, the progress of an investigation, the finding and action taken to the alleged victim and their parent/carer unless the College Principal or Heads of College (Head of Primary and Head of Secondary) considers that it is not in the public interest to do so.
- provide required information to the OCG under relevant provisions of the Act.
- ensure an appropriate level of confidentiality of information relating to reportable allegations and only disclose information about the allegations in circumstances permitted by the Act or other legislation.
- advise employees that the OCG Reportable Conduct Directorate will consequently report internally to the WWCC Directorate in relation to investigations that result in sustained findings of sexual misconduct, a sexual offence or a serious physical assault.¹⁵

¹⁵ [Making Finding Reportable Conduct.pdf.aspx \(nsw.gov.au\)](#)



3.2 Employees

Any information about an employee, volunteer or contractor who may be engaging in conduct that is considered inappropriate¹⁶ or conduct that may amount to a reportable allegation must be reported to the College Principal or Heads of College (Head of Primary and Head of Secondary). It does not matter if there is uncertainty about the substance of the information, whether the information is reliable or how the information came to light. Regardless of the veracity of the information, this information must still be reported to the College Principal or Heads of College (Head of Primary and Head of Secondary).

Employees must also report to the College Principal when they become aware that an employee has been charged with, or convicted of, an offence (including a finding of guilt without the court proceeding to a conviction) involving reportable conduct.

Employees must disclose to the College Principal if they have been charged or convicted of an offence. This self-report should be made without delay.

If a reportable allegation is raised against the College Principal, the employee must report the information to the Chair of the College Board.

3.3 Definitions Relevant to Reportable Allegations and Convictions

Employee¹⁷

An employee captured by the reportable conduct scheme includes:

- an individual employed by, or in, an entity.
- a volunteer providing services to children.
- a contractor engaged directly by the school (or by a third party) where the contractor holds, or is required to hold, a Working with Children Check for the purposes of their work with the school.
- a person engaged by a religious body where that person holds, or is required to hold, a Working with Children Check for the purposes of their work with the religious body.

Sexual offence¹⁸

Sexual offence means an offence of a sexual nature under a law of the State, another State, a Territory, or the Commonwealth, committed against, with or in the presence of a child.

Examples of sexual offences:

- sexual touching of a child,
- a child grooming offence,
- production, dissemination or possession of child abuse material.

¹⁶ Inappropriate includes behaviours outside the expectations stipulated in the school's code of conduct or behaviour that poses risk to a student (regardless of their age), children, young people or the employee.

¹⁷ Section 16 of the CG Act.

¹⁸ Section 21 of the CG Act.



An alleged sexual offence does not have to be the subject of criminal investigation or charges for it to be categorised as a reportable allegation of sexual offence for the purposes of the reportable conduct scheme.

Sexual Misconduct¹⁹

Sexual misconduct means conduct with, towards or in the presence of a child that is sexual in nature, but is not a sexual offence.

Examples of sexual misconduct:

- descriptions of sexual acts without a legitimate reason to provide the descriptions,
- sexual comments, conversations or communications,
- comments to a child that express a desire to act in a sexual manner towards the child or another child.

Ill-treatment²⁰

Ill-treatment of a child means conduct towards a child that is unreasonable and seriously inappropriate, improper, inhumane or cruel.

Examples of ill-treatment:

- making excessive or degrading demands of a child,
- a pattern of hostile or degrading comments or behaviour towards a child,
- using inappropriate forms of behaviour management towards a child.

Neglect²¹

Neglect of a child means a significant failure to provide adequate and proper food, supervision, nursing, clothing, medical aid or lodging for the child, that causes or is likely to cause harm to a child, by

- a person with parental responsibility for the child, or
- an authorised carer of the child, or
- an employee, if the child is in the employee's care.

Examples of neglect:

- failing to protect a child from abuse,
- exposing a child to a harmful environment, for example, an environment where there is illicit drug use or illicit drug manufacturing.

Assault²²

Assault means the intentional or reckless application of physical force without lawful justification or excuse, or any act which intentionally or recklessly causes another to apprehend immediate and unlawful violence.

¹⁹ Section 22 of the CG Act.

²⁰ Section 23 of the CG Act.

²¹ Section 24 of the CG Act.

²² Section 25 of the CG Act.



Examples of assault:

- hitting, striking, kicking, punching or dragging a child,
- threatening to physically harm a child.



4 Working with Children Check Scheme

The Child Protection (Working with Children) Act 2012 (WWC Act) and the Child Protection (Working with Children) Regulations 2013 underpins the Working with Children Check Scheme (WWCC) in NSW. The WWCC Scheme aims to protect children by:

- precluding certain individuals from engaging in child-related work, and
- requiring individuals engaged in child-related work to have working with children check clearances.

The Office of the Children's Guardian (OCG) administrates the WWCC Scheme. The WWCC Scheme is one of a number of ways Summerland Christian College builds a safe environment for children. A WWCC involves a national criminal history check through the Australian Criminal Intelligence Commission and NSW Police as well as data held by the OCG based around adverse findings of workplace misconduct involving children.

The OCG is responsible for determining if a person is granted a WWCC clearance or refused a WWCC clearance.

In NSW certain individuals who work or volunteer in child related work are required to have a WWCC application or clearance.

4.1 The School

Summerland Christian College has legal obligations under the WWC Act and in relation to employing or engaging people to work with children.

It is against the law for Summerland Christian College to employ or engage anyone in child-related work without a WWCC.

The College Principal or the College Principal's delegate, will:

- verify an employee's WWCC number online. This includes verifying:
 - new workers or volunteers,
 - a renewed WWCC, updated after five years.
- keep centralised records of employees and volunteers who require a WWCC and when they were verified.
- remind employees to renew their WWCC up to three months before their WWCC expires.
- remove an employee or volunteer from child related work who has a WWCC status that is barred, interim barred, or whose WWCC cannot be found or has expired.

Not all individuals who work or are engaged at Summerland Christian College are considered to be in child-related work and therefore are not eligible for a WWCC. In these circumstances Summerland Christian College will:



- Apply appropriate measures to keep children safe. This may be a combination of induction training, referee checks, provide supervision, undertake a Police check, include WWCC expectations in contractual arrangements with third parties such as overnight camp facility or maintenance contractors, risk assessments considering mitigation strategies in hiring out/leasing school facilities to third parties.

Adults who are working or volunteering at Summerland Christian College and are not in child-related work or not eligible for a WWCC clearance, such as parent volunteers or contractors, are required to sign the Summerland Christian College declaration stating they are suitable to work or volunteer with children.

4.2 Employees

It is against the law for an individual to work or engage in child-related work without a valid WWCC clearance.

Employees must:

- hold and maintain a WWCC clearance.
- immediately inform the College Principal of any changes to their WWCC clearance or status.²³
- not engage or work in any child-related activities if they have an interim bar, cancelled or an expired WWCC clearance.
- immediately report to the College Principal or Heads of College (Head of Primary and Head of Secondary) if they believe another employee (including a volunteer or contractor) has had any change to their WWCC clearance or status.²⁴
- ensure Summerland Christian College and the OCG have their most current contact details.

All employees, regardless of their role or relationship with Summerland Christian College are required to read, be aware and follow the expectations of Summerland Christian College as detailed in the following policies:

- Summerland Christian College Code of Conduct;
- Summerland Christian College Workplace Health and Safety Policy;
- Summerland Christian College Complaints and Grievances Policy; and
- Summerland Christian College Bullying and Harassment Policy and Discrimination, Harassment and Bullying Statement.

If an employee has any questions or require additional information regarding any part of these policies they are to speak with the College Principal or Heads of College (Head of Primary or Head of Secondary) as a matter of priority.

²³ This may include the OCG conducting a risk assessment, issuing an interim bar, a bar, or a WWCC expiring.

²⁴ As above.



4.3 Definitions Relevant to the Working With Children Scheme²⁵

Working With Children Check Clearance

A Working With Children Check Clearance is authorisation granted by the OCG to an adult applicant that then allows them to apply for and engage in child-related work. A WWCC clearance is valid for 5 years unless it is cancelled or surrendered.

Cancellation of clearance

The OCG must cancel an individual's WWCC if the OCG becomes aware the person is a *disqualified person* or becomes satisfied that the person poses a risk to the safety of children.

Child

A child is anyone under the age of 18 years.

Child-related Work

Child-related work includes employment at Summerland Christian College and where the role involves:

- direct contact with a child or children and that contact is a usual part of their role and more than incidental to their work

Child-related Work Setting

Child-related work settings include, but are not limited to:

- children's health services
- clubs or other bodies providing services for children
- disability services
- early education and childcare
- schools or other educational institutions and private coaching or tuition of children,
- sporting cultural or other entertainment venues used primarily by children and entertainment services for children
- religious services
- residential services, such as boarding houses or other residential services for children and overnight camps for children
- transport services including school bus services and taxi services for children with a disability and supervision of school road crossings.

Direct Contact

Direct contact with children means:

- physical contact, or
- face to face contact.

Disqualified Person

²⁵ Definitions have been obtained from the WWC Act and the OCG website [I'm an employer - NSW Office of the Children's Guardian](#).



A disqualified person is an individual who has been convicted, or has proceedings against them for an offence which is listed in Schedule 2²⁶ of the WWC Act. The OCG can not grant a disqualified person with a WWCC clearance.

Interim Bar

An interim bar can be issued to an applicant or a person with a WWCC clearance if the OCG has determined that it is likely that there is a risk to the safety of children if the individual continues in child-related work. An interim bar can be in place for up to 12 months.

Risk Assessment

A risk assessment, conducted by the OCG, is to determine whether an applicant or a holder of a WWCC clearance poses a risk to the safety of children.

²⁶ <https://legislation.nsw.gov.au/view/html/inforce/current/act-2012-051#sch.2>



5 Relevant Criminal Offences

2.

Summerland Christian College wants employees to be aware of certain reporting expectations of all adults in NSW with regards to informing NSW Police of child abuse offences.

Failure to report a child abuse offence²⁷

All adults in NSW are required to report information to Police if they know, believe or reasonably ought to know that a child has been abused.

A child under this section (s316A) of the Crimes Act 1900 is a person under the age of 18 years.

Failing to report information to Police without a reasonable excuse is an offence punishable by up to two years imprisonment. The penalty will be five years if the person has accepted any benefit in exchange for failing to report.

A reasonable excuse for not reporting maybe:

- if the victim is now an adult and doesn't want the offence reported, or
- if the offence has already been reported to the Child Protection Helpline, or
- if the person fears for their safety or another person's safety if they report.

If an employee has a reasonable belief that a child has been abused, they must report this information to [the Principal or the Principal's delegate] as outlined above under section 2 'Mandatory Report' of this policy.

Failure to reduce or remove risk of a child becoming victim of child abuse²⁸

The Crimes Act 1900 requires people in authority to protect the child from the abuse where possible. This means an adult working in an institution in child-related work, with the power to reduce or remove the risk will commit an offence if they know another adult working there poses a serious risk of abusing a child and they fail to do so. The offence will be punishable by up to two years imprisonment.

Child abuse offences²⁹ covers a range of offences, including but not limited to:

- any acts causing danger to life
- neglect of a child
- assault offences
- any sexual offences against a child, including inciting someone to commit a sexual offence on a child
- child abuse material offences.

²⁷ Section 316A of the *Crimes Act 1900* NSW

²⁸ Section 43B of the *Crimes Act 1900* NSW

²⁹ Section 316A (9) of the *Crimes Act 1900* NSW



6 Other Obligations

6.1 Training

Summerland Christian College recognises the importance of employees being equipped to keep children and young people safe through ongoing education and training.

Summerland Christian College will provide annual updates to staff regarding child protection, child safety and safeguarding of children and young people.

Any professional development relevant to safeguarding children and young people will require compulsory attendance.

6.2 Record Keeping

Summerland Christian College recognises that the creation of accurate records and good record keeping practices play a critical role in preventing, identifying, and responding to child safety information.

6.2.1 The School

The School will maintain records, including but not limited to, the following:

- records about reportable conduct allegations (stored securely and under restricted access).
- records relating to child safety and wellbeing.
- record of reports made to DCJ and / or NSW Police.
- a register (working with children register) of relevant details for child-related workers and of the online verification of Working With Children Checks.
- attendance records of compulsory professional development sessions examining safeguarding at Summerland Christian College.
- confirmation that employees have read this policy.

6.2.2 Employees

It is a requirement of all employees that they will create and keep full and accurate records relating to child safety and wellbeing matters. These records should be captured in a timely manner and recorded on Sentral.

Full and accurate records should be created about instances, responses and decisions affecting child safety and wellbeing.

Records relevant to child safety and wellbeing should only be disposed of in accordance with the relevant law or school policy.



6.3 Confidentiality

Employees must deal with information relating to child protection, child safety, safeguarding and reportable allegation concerns confidentially³⁰.

Employees who become aware of a breach of confidentiality in relation to a child protection, child safety, safeguarding or reportable allegation matter must advise the College Principal or Heads of College (Head of Primary and Head of Secondary) immediately.

Breaches of confidentiality by paid employees will be viewed seriously and may result in employment consequences. For contractors and volunteers, a breach of confidentiality may result in a review of engagement with the school.

³⁰ Meaning: the fact of private information being kept secret.



7 Relevant NSW Legislation

This policy has been developed in line with the following key pieces of safeguarding legislation in NSW:

- the Children and Young Persons (Care and Protection) Act 1998 ("CYP Act")
- the Children's Guardian Act 2019 ("CG Act")
- the Child Protection (Working with Children) Act 2012 ("WWC Act")
- the Child Protection (Working with Children) Regulations 2013
- the Crimes Act 1900 ("Crimes Act").

8 Other Policies

This policy works in conjunction with other Summerland Christian College policies. These include, but are not limited to:

- Summerland Christian College Code of Conduct;
- Summerland Christian College Workplace Health and Safety Policy;
- Summerland Christian College Complaints and Grievances Policy;
- Summerland Christian College Bullying and Harassment Policy and Discrimination, Harassment and Bullying Statement.

9 Informing Staff and Declaration

All staff are expected to be aware of the requirements of this policy and all related policies. In order to enable staff to have the opportunity to be informed of the policy requirements the following procedures are in place:

- All new staff must have a current Working With Children Check clearance, which must be provided to the school, and a record held on file.
- All staff will have a current Working With Children Check clearance
- All staff sign an affirmation that they will abide by the Staff Code of Conduct, which requires that all staff members of SCC must be familiar with the school's Child Safety Policy and how it is implemented.
- At the beginning of the school year, a staff meeting will be held, where all staff are present, in which a Child Safety Policy overview will be presented.
- The Child Safety Policy is provided to new staff as part of their induction.
- All staff have access to the school's policy suite via the College Document Drive. Staff are expected to utilise this facility when undertaking College business in order to be fully cognisant of all relevant policies, including the Child Safety Policy.
- Staff who have any questions or uncertainties regarding child protection matters are encouraged to consult with their Head Teacher and, or, the College Principal.
- Staff are encouraged to refer to:
 - the "Keep Them Safe" website (<http://www.keepthemsafe.nsw.gov.au/home>) in relation to decision trees for mandatory reporting; or the NSW Ombudsman's website (<https://www.ombo.nsw.gov.au/home>) for further assistance and information on reportable conduct.



DECLARATION

I, _____, confirm I have read and understand the above policy and procedure guide.

Date: ____ / ____ / _____

Signature: _____

10 Status and Review

This policy was approved by the College Board on 8 December, 2022.

This policy was implemented by the College on 31 January, 2023

This policy will next be reviewed by the College Principal by end January, 2025.

ATTACHMENTS

Appendix 1 sets out the legal responsibility for reporting of students at risk of significant harm

Appendix 2 sets out the legal responsibility for reporting policy of the NSW Ombudsman in relation to allegations of reportable conduct against employees.

Appendix 3 sets out the procedures for dealing with allegations of reportable conduct against employees.

Appendix 4 sets out the guidelines and procedures for identifying students at risk of significant harm.

Appendix 5 sets out the procedures for child interviews by Police or the Child Protection Helpline and removal of students.

Appendix 6 sets out the protocols for student security as they relate to identifying staff as well as registering and identifying school visitors and volunteers.



APPENDIX 1

LEGAL RESPONSIBILITY FOR REPORTING OF STUDENTS AT RISK OF SIGNIFICANT HARM

All notifications that involve a criminal offence under the Children (Care and Protection) Act, the Crimes Act 1900 or the Crimes (Female Genital Mutilation) Act 1995 must be referred by the Department of Family & Community Services to the Police. This includes all cases of sexual abuse. Child abuse under the Crimes Act 1900 refers to a range of offences that result in harm to a child victim or which involve behaviours to which a child cannot give consent. Offences include sexual intercourse, indecent assault and indecent acts. The practicing, aiding, abetting, towards or procuring of someone to practice female genital mutilation is an offence under the Crimes (Female Genital Mutilation) Act 1995.

The Role of the Family & Community Services and Other Government Agencies

Scripture assigns Governments the role of punishing wrong doers and endeavouring to protect their citizens and the school supports the role the Government plays in protecting children through the Child Protection Helpline, the NSW Police Service and the Attorney General's Department. The school aims to develop a relationship with the Child Protection Helpline that will enable the school to be involved in the process of protecting children.

The Children and Young Persons (Care and Protection) Act, 1998

When investigating whether take action under Children and Young Persons (Care and Protection) Act, 1998, school staff must satisfy themselves that they are acting on reasonable grounds. This Act forms the statutory basis for the role of the Child Protection Helpline for the investigation of cases of a child at risk of significant harm and the responsibilities borne by schools in relation to such cases. A child is defined as a person under the age of 18 years.



APPENDIX 2

PROCESS FOR INVESTIGATING AN ALLEGATION OF REPORTABLE CONDUCT

The College Principal is responsible for ensuring that the following steps are taken to investigate an allegation of reportable conduct.

Once an allegation of reportable conduct against an employee is received, the College Principal is required to:

- determine whether it is an allegation of reportable conduct;
- assess whether the DCJ or the Police need to be notified (i.e., if there are reasonable grounds to suspect that a child is at risk of significant harm or a potential criminal offence). If they have been notified, seek clearance from these statutory agencies prior to the College proceeding with the reportable conduct investigation;
- notify the child's parents (unless to do so would be likely to compromise the investigation or any investigation by the DCJ or Police);
- notify the OCG within 7 business days of receiving the allegation;
- carry out a risk assessment and take action to reduce/remove risk, where appropriate;
- provide an initial letter to the ESOA advising that an allegation of reportable conduct has been made against them and that it is the School's responsibility to investigate this matter under Section 34 of the Children's Guardian Act 2019; and
- investigate the allegation or appoint someone to investigate the allegation.

Investigation principles

During the investigation of a reportable conduct allegation the College will:

- follow the principles of procedural fairness;
- inform the ESOA of the substance of any allegations made against them, at the appropriate time in the investigation, and provide them with a reasonable opportunity to respond to the allegations;
- make reasonable enquiries or investigations before making a decision;
- avoid conflicts of interest;
- conduct the investigation without unjustifiable delay;
- handle the matter as confidentially as possible; and
- provide appropriate support for all parties including the child/children, witnesses and the ESOA.

Investigation steps

In an investigation the Principal or appointed investigator will generally:

- interview relevant witnesses and gather relevant documentation;
- provide a letter of allegation to the ESOA;
- provide the ESOA with the opportunity to provide a response to the allegations either in writing or at interview;
- consider relevant evidence and make a preliminary finding in accordance with the OCG guidelines;
- inform the ESOA of the preliminary finding in writing and signed by the Principal as



Head of Entity and provide them with a further opportunity to respond or make a further submission prior to the matter moving to final findings;

- consider any response provided by the ESOA;
- make a final finding in accordance with the OCG guidelines;
- decide on the disciplinary action, if any, to be taken against the ESOA;
- if it is completed, send the final report to the OCG within 30 days after having received the allegation, as per section 36 of the Children's Guardian Act 2019.
- should the final report be unfinished within 30 days, the Principal as Head of Entity must provide, at least, an interim report to the OCG within 30 days of having received the allegation, as per section 38 of the Children's Guardian Act 2019.

An interim report must include:

- a reason for not providing the final report within 30 days and an estimated time frame for completion of the report;
- specific information, including (if known) the facts and circumstances of the reportable allegation; any known information about a reportable conviction; action taken since the OCG received a notification about the reportable allegation or reportable conviction; further action the Head of Entity proposes to take in relation to the reportable allegation or reportable conviction, including if the Head of Agency proposes to take no further action; the reasons for the action taken and the action proposed to be taken or the reasons for the decision to take no further action; other information prescribed by the regulations; and
- copies of documents in the College's possession, including transcripts of interviews and copies of evidence.

The steps outlined above may need to be varied on occasion to meet particular circumstances. For example, it may be necessary to take different steps where the matter is also being investigated by the DCJ or Police.

An ESOA may have an appropriate support person with them during the interview process. Such a person is there for support only and as a witness to the proceedings and not as an advocate or active participant.

Risk management throughout an investigation of a reportable conduct allegation

Risk management means identifying the potential for an incident or accident to occur and taking steps to reduce the likelihood or severity of its occurrence.

The College Principal is responsible for risk management throughout the investigation and will assess risk at the beginning of the investigation, during and at the end of the investigation.

Initial risk assessment

Following an allegation of reportable conduct against an employee, the Principal will conduct an initial risk assessment to identify and minimise the risks to:

- the child(ren) who are the subject of the allegation;
- other children with whom the employee may have contact;
- the ESOA;
- the College; and



- the proper investigation of the allegation.

The factors which will be considered during the risk assessment include:

- the nature and seriousness of the allegations;
- the vulnerability of the child(ren) the ESOA has contact with at work;
- the nature of the position occupied by the ESOA;
- the level of supervision of the ESOA; and
- the disciplinary history or safety of the ESOA and possible risks to the investigation.

The College Principal will take appropriate action to minimise risks. This may include the ESOA being temporarily relieved of some duties, being required not to have contact with certain students, being asked to take paid leave, or being suspended from duty. When taking action to address any risks identified, the College will take into consideration both the needs of the child(ren) and the ESOA.

A decision to take action on the basis of a risk assessment is not indicative of the findings of the matter. Until the investigation is completed and a finding is made, any action, such as an employee being suspended, is not to be considered an indication that the alleged conduct by the employee did occur.

Ongoing risk assessment

The College Principal will continually monitor risk during the investigation including in the light of any new relevant information that emerges.

Findings

At the completion of the investigation, a finding will be made in relation to the allegation and a decision made by the College Principal regarding what action, if any, is required in relation to the ESOA, the child(ren) involved and any other parties.

Information for the ESOA

The ESOA will be advised:

- that an allegation has been made against them (at the appropriate time in the investigation); and
- of the substance of the allegation, of any preliminary finding and of the final finding.

The ESOA does not automatically have the right to:

- know or have confirmed the identity of the person who made the allegation; or
- be shown the content of the OCG notification form or other investigation material that reveals information provided by other employees or witnesses.

Once final findings are made, The WWC Act allows the ESOA to request access to the records held by the College in relation to the finding of misconduct involving children. The entitlements of a person to request access to information in terms of section 46 of the WWC Act is enlivened when a finding of misconduct involving children has been made.

Disciplinary action

As a result of the allegations, investigation or final findings, the College may take disciplinary action against the ESOA including termination of employment.



In relation to any disciplinary action the College will give the ESOA:

- details of the proposed disciplinary action; and
- a reasonable opportunity to respond before a final decision is made.

Confidentiality

It is important when dealing with allegations of reportable conduct that the matter be dealt with as confidentially as possible. The College requires that all parties maintain confidentiality during the investigation including in relation to the handling and storing of documents and records. Records about allegations of reportable conduct against employees will be kept in the College Principal's (or College principal Executive Assistant) office in a locked file and will be accessible only by the College Principal as Head of Agency or with the Head of Agency's express authority.

No employee may comment to the media about an allegation of reportable conduct unless expressly authorised by the College Principal to do so.

Staff members who become aware of a breach of confidentiality in relation to a reportable conduct allegation must advise the College Principal.



APPENDIX 3

GUIDELINES AND PROCEDURES FOR IDENTIFYING CHILDREN AT RISK OF SIGNIFICANT HARM

There are four areas where children may be at risk of significant harm. They are

- Physical abuse
- Sexual abuse
- Psychological abuse (Harassment)
- Neglect

Mandatory Reporter Guide

Staff are to use the Mandatory Reporter Guide produced by the NSW Government as part of it “Keep them Safe” program. The guide can be found at the Keep them Safe website (<http://www.keepthemsafe.nsw.gov.au/home>). The guide is available as an interactive online tool, or as a PDF document.

The guide has been developed to assist front-line mandatory reporters such as police officers, teachers, nurses, social workers, and NGO staff to determine whether a case meets the new risk of significant harm threshold for reporting children and young people at risk in NSW. It is based on research findings (customised for use in NSW) from the Structured Decision Making model developed by the Children’s Research Centre, a US-based non-profit social research organisation.

The purpose of the Mandatory Reporter Guide is to guide decision making, about whether or not a report to the Child Protection Helpline is appropriate under the new risk of significant harm reporting threshold. It is intended to complement rather than replace critical thinking and does not prohibit a mandatory reporter from any course of action he/she believes is appropriate. If you become concerned that a child or young person known to you in your capacity as a mandatory reporter is being abused or neglected, or is likely to be abused or neglected, this Mandatory Reporter Guide (MRG) is a resource to help you make a decision about whether to report.

When using the online guide, select the main decision tree that most closely matches the concerns you have. If you have more than one concern, start with your most serious concern.

After selecting the applicable decision tree, you will be asked questions. It is important to read the accompanying definitions to complete a 'yes' or 'no' answer until a final decision is reached. After completion of each decision tree, a decision report will issue with an explanation of the outcome based on your completion of the decision tree. This should be printed and/or saved for your records.

If your concern does not fit any of the decision trees, it is probably not reportable, but you may consult with your Department's Child Wellbeing Unit (CWU) and/or your supervisor as appropriate. You may call the Child Protection Helpline to report directly however the report should always be informed by having used the Mandatory Reporting Guide which defines the reporting threshold for statutory child protection reports, i.e., whether or not to report to Family & Community Services.



Indicators of Abuse and Neglect

Your first priority is to refer to the Mandatory Reporter Guide. However, the following information may assist you to identify the main characteristics of the indicators of a child at risk of significant harm.

General Indicators

None of these indicators, on their own, should be taken as clear evidence of abuse.

- History of previous harm to the child
- Neglect of a sibling
- Social or geographic isolation of the child or family
- Family history of violence including injury to children
- Domestic violence
- Physical or mental health issue affecting the parent or care giver
- The parent or care givers' abuse of alcohol or other drugs
- A developmental disability affecting the parent or care giver
- Parent or care giver experiencing significant problems in managing the child's behaviour
- A history of injury which is vague, bizarre or variable
- Marked delay between injury and presentation for medical assistance
- The child tells you he or she has been abused, or he or she knows someone who is at risk of significant harm and may be referring to themselves
- A friend, relative etc., tells you that the child may be at risk of significant harm

Specific Indicators

Sexual

- Direct or indirect disclosures
- Describing sexual acts
- Age inappropriate behaviour and/or persistent sexual behaviour
- Age in appropriate knowledge
- Self destructive behaviour (e.g. self mutilation, suicide attempts)
- Overtly sexual themes in play, artwork or writing
- Persistent running away from home
- Anorexia, over eating
- Unexplained accumulation of money or gifts
- Adolescent pregnancy
- Injuries to the breasts, buttocks, lower abdomen, thighs and genitalia
- Other child stress indicators (e.g. poor concentration, nightmares and bed wetting, marked changes in behaviour, complaints of stomach aches and headaches with no physical findings)

If a child tells you about a student at risk of significant harm

Staff need to be well prepared so that they can be supportive of the student and clear about their

responsibilities at the same time. It is essential that the staff member remains calm and supportive

of the student. The staff member should:

- Be aware of the common indicators (see section 8) above);
- Actively listen to the student and never probe for details or ask leading questions;
- Refrain from questioning excessively even if unsure of whether to notify;
- Talk gently and reassuringly, pointing out that you are there to help;
- Only ask open ended questions that are designed to provide sufficient information about whether the suspicion of significant harm is reasonable and therefore sufficiently strong enough to warrant a report being made, without suggesting the complaint is not believed



- Where a risk of significant harm exists outside the school's control, never assure the student that the harm will stop as that cannot be guaranteed; do not make promises that you will not tell anyone. In fact, you should disclose that you have a responsibility to tell the Principal and relevant government department.

If a student begins to make a disclosure in a group situation (say in a camp sharing time)

Staff are required to:

- Acknowledge that they have heard the student;
- Indicate support by explaining that what the student has said sounds important and that it would be better to talk about it later;
- Immediately yet discretely arrange an appropriate time to see the student away from other students. If you have reason to suspect a student is at risk of significant harm From time to time staff may suspect that child is at risk of significant harm. Staff need to be aware of the indicators of child abuse. (See section i) above.)

If the school has evidence of a crime the matter will be reported directly to the Police by the Child Protection Helpline.

If someone, other than the child concerned, reports to you about a students at risk of significant harm

- Staff or students who, in good faith, make a report of suspected/alleged improper conduct of a sexual or abusive nature by a person against a student will not be prejudiced in any way. Assure them you will do everything you can to assist.
- In appropriate circumstances, staff may seek the advice of the Principal or another member of the Senior Executive without derogating from their responsibility under the Child Protection legislation.



APPENDIX 4

PROCEDURE FOR STUDENT INTERVIEW CONDUCTED BY POLICE OR CHILD PROTECTION HELPLINE AT SCHOOL

In relation to reportable cases of abuse where the Child Protection Helpline has been notified, officers of the Helpline and the NSW Police Service may wish to carry out student interviews, sometimes jointly, at school.

Before allowing any officers access to information or students, the Principal should sight the officer's identification and may choose to confirm this with a phone call to their office.

No student will be interviewed at the school against the wishes of the student and it is the College Principal's responsibility to inform the student of this.

The Officers should give the school, in writing, an official confirmation of an investigation involving a particular child.

At the commencement of the interview, the Principal should ask the investigating officers to explain to the student, in the presence of the Principal, the purpose of the interview and their role.

The Principal will inform the student of his or her right to choose a supportive adult to be present at the interview. If a person is nominated by the student, the interview must not commence until that person has arrived.

What takes place in the interview becomes part of the investigation and must remain confidential. The interview may be taped by the support person if all parties agree; otherwise notes should be taken by the support person as a record of interview for the school.

Except in cases which involve a member of the family, it is expected that a parent of the child concerned will be present at any interview with the child. Should the allegations be made against a family member the parents will be informed of the interview as soon as possible after it has commenced.

Child Protection Helpline or Police officers are responsible for communicating with parents about any further matters related to an interview.

Exchange of Information with Child Protection Helpline

Before any phone discussion occurs between officers of the Child Protection Helpline and the Principal, the Principal must always confirm the identity of the caller by phoning the known number of the Child Protection Helpline before any discussions occur.

Any information requested verbally must be confirmed in writing promptly.

Any staff member who receives a call from the Child Protection Helpline must refer the officers to the Principal.

The Principal should inform parents immediately that the school has supplied information to the Child Protection Helpline unless the Helpline supplies the school with a written direction that the parents are not yet excluded from suspicion and hence not entitled to receive information.

Removal of Students by Child Protection Helpline

From time to time the Principal may be approached by officers from the Child Protection Helpline to remove a student from school premises. This approach will be supported by a Section 60 notice. If a student is to be removed from School (Section 60) or ordered to remain at the school (Section 62A) the Principal must:

- Sight the identification of the officers;
- Take a copy of the Section 60 or Section 62A notice;
- Record details of the actions, names of officers and, where possible, place of lodgement of the student;



- Gain an assurance from officers of the Child Protection Helpline that they will immediately inform the parent or care giver that the student has been removed from the school or has been ordered to remain at the school.



APPENDIX 5

PROTOCOLS AND PROCEDURES FOR THE IDENTIFICATION OF STAFF, VISITORS AND VOLUNTEERS

1. Staff

- All students must be able to identify staff and feel safe in approaching staff. All staff members are required to wear an official identification badge issued by the School. The badge displays the name and role of the staff member.

2. Volunteers and Visitors

- All visitors and volunteers are required to report to the school reception desk. (Direction signs are located at front of administration building)
- Visitors and volunteers are required to enter time and details of their visit in the Visitor Register.
- Visitors and volunteers are given an identification badge to wear which must be prominently displayed while they are on the premises. This is returned to the reception desk when they sign out and depart.
- Trades persons and short term workers on site are subject to protocols embedded in the School Induction Policy.
- All students are encouraged to report to a staff member the presence of any unidentified person on the school grounds. Staff will be responsible to ensure that any unidentified person on the school grounds immediately registers their visit at the school reception desk or take any further appropriate action deemed necessary.

Important Note

Some school volunteers may be required to complete a Prohibited Employment Declaration and Working with Children Check clearance according to Working with Children Employer guidelines.

