



PENLEIGH AND ESSENDON GRAMMAR SCHOOL

## **Policy for a Child Safe School**

### **Purpose**

**The purpose of this policy is to protect students from physical, sexual or psychological abuse at school; to set up safe systems to support this commitment; to spell out the strategies to embed an organisational culture of child safety for all members of the school community; and to promote child empowerment and participation.**

### **Scope**

This policy refers to the commitments to child safety by all members of the Penleigh and Essendon Grammar School community. Its requirements relate to the Board of Directors, staff, volunteers and contractors. The policy applies across all school campuses and facilities both during and outside school hours, outside the physical school environs and online.

With the endorsement of the Board of Directors, Penleigh and Essendon Grammar School is committed to supporting a culture of safety, trust and respect. The school encourages an environment in which relationships of staff with students, and interactions between students are responsive and respectful, the diversity of students' backgrounds and personal needs are recognised and in which students' resilience, sense of security and belonging are promoted.

The school has a policy of zero tolerance for child abuse. Inappropriate behaviours including physical, sexual and psychological abuse, bullying, harassment, discrimination and violence are unacceptable and Penleigh and Essendon Grammar School is committed to working toward the elimination of these behaviours. This undertaking applies to interactions between staff member and student and between student and student.

All staff, volunteers and others interacting with children are encouraged to interact positively, using positive language, and acknowledge and model respectful behaviour following the Code of Conduct for staff and others interacting with students and in accordance with the published Statement of Our Behaviour.

This policy relates to all students at the school from Kindergarten through Year Twelve and refers to professional conduct of all staff; measures for the employment and supervision of school staff in all child-connected work together with procedures for responding to and reporting allegations of suspected child abuse; identifying and reducing or removing risks of child abuse; supporting staff, parents and students to understand, identify and report child safety matters related to the school environment; and actions to foster child empowerment and participation in the promotion of child safety within the school environment.

The policy is formulated with reference to *Ministerial Order No 870 - Child Safety Standards- Managing the risk of child abuse in schools* and the **reportable conduct scheme administered by the Commission for Children and Young People, Victoria (CCYP)**. It should be read in conjunction with the **Policy for Protection of Children and Managing the Risk of Child Abuse** which addresses mandatory reporting by registered teachers (including kindergarten teachers), school principals, registered psychologists, school counsellors among certain other professionals. These individuals are required to report to DFFH Child Protection suspected cases of physical abuse or sexual abuse of a child, or if the child's parents or guardians have not protected them or are unlikely to protect them from harm of that type.

**The Policy for Protection of Children and Managing the Risk of Child Abuse** also addresses community obligations related to sexual abuse or sexual grooming activities: both protection of a child from sexual abuse or sexual grooming activities and disclosure of incidences of that type. Attention is also drawn to the school's **Code of Conduct for staff and others interacting with students**, to which all staff are required to adhere, and the **Policy of Mutual Respect and Behaviour Management** which describes expectations for student behaviour and the school's responses to bullying and other negative behaviour.

In accordance with Victoria's Child Safe Standards, specific attention is directed to respecting, valuing and protecting children of Aboriginal and Torres Strait Island heritage and the importance of culture to their safety and wellbeing.

Our **Privacy Policy** sets out the manner in which we collect, use, disclose and manage personal information and should be consulted with reference to the requirements as set out below.

### **Staff selection, supervision and management practices**

Each job listing which involves child-related work will have a clear statement that sets out the job requirement, responsibilities and duties regarding child safety, and includes essential or relevant qualifications, experience and attributes in relation to child safety. All applicants will be informed about the school's child safety practices, including the contents of this policy, the Policy for Protection of Children and Managing the Risk of Child Abuse and the requirement for compulsory adherence to the Code of Conduct for staff and others who interact with students (with certain specific exceptions where other professional or occupational codes of conduct that regulate staff members would be breached by adherence to aspects of the code).

In accordance with statutory requirements, the school will where possible gather, verify and record the following for staff it proposes to engage to perform child-connected work:

- Working with Children Check status;
- Proof of personal identity and any professional or other qualifications;
- Person's history of work involving children;
- References that address the person's suitability for the job and for working with children.

The school will provide explicit supervision and support to new staff and induction into the school's policies, codes and practices related to protection of children. It will ensure that these policies are available for staff reference, ie on PEGSpace, and updated at regular and assigned intervals.

## **Annual training concerning individual and collective obligations and responsibilities for managing the risk of child abuse**

The Board of Directors and all staff members, including casual staff, student teachers, contractors and other persons interacting with students will be required annually to both:

- sign the Code of Conduct for staff and others working with children, and
- complete an online training package

to ensure understanding of their obligations and responsibilities to child safety.

Staff members' suitability to continue in a child-connected role will be monitored as a compulsory component of staff management in the annual performance review and will be monitored by the Principal as a component of the annual report to the Board of Directors on child safety.

## **Responding to and reporting allegations of suspected child abuse**

### **i. Reporting by students of suspected child abuse**

Any student who has experienced physical or sexual abuse or suspects that another student has been the subject of abuse is instructed to immediately report this information to their Head of Section, another teacher or student counsellor who will take action to protect the victim(s) and remove the actual or potential threat.

### **ii. Reporting by staff or other adults of suspected child abuse**

The school is committed to upholding its responsibility to reduce or remove any substantial risk that a child will become a victim of abuse committed by anyone associated with the school. Procedures for responding to and reporting allegations of suspected child abuse are defined in our **Policy for Protection of Children and Managing the Risk of Child Abuse**. As stated in the **Code of Conduct for staff and others working with students**, any member of staff or other person who interacts with students at Penleigh and Essendon Grammar School forming a reasonable belief that a child has been abused or is at risk of abuse should notify the Head of Section, Vice Principal or Principal immediately, or as soon as is reasonably practicable and preferably within one day.

A reasonable belief is formed if a reasonable person, doing the same work, would form the same belief on those grounds, based on the same information. Reporters are not expected to have evidence or to be certain. Child Protection is responsible for assessing reports and deciding how to respond.

A reasonable belief that a child is in need of protection is likely formed in circumstances where:

- a child discloses that they have suffered or are suffering non-accidental physical injury, sexual abuse, psychological or emotional abuse or is victim of a sexual grooming activity;
- a relative, friend or acquaintance states that a child has been non-accidentally injured, sexually abused, psychologically or emotionally abused or is victim of a sexual grooming activity;
- professional observations of the child's physical condition or behaviours lead to a reasonable suspicion that the child has suffered non-accidental physical injury, sexual abuse, psychological or emotional abuse or is victim of a sexual grooming activity.

If a staff member suspects that a child is in need of protection within the school environment they should document their concerns and observations in a confidential file for discussion with the Head of Section, Vice Principal or Principal. The Head of

Section, Vice Principal or Principal will act in accordance to the Policy for the Protection of Children and Managing the Risk of Child Abuse.

Upon receiving an allegation the Principal will:

- Take immediate action to protect children from further potential for abuse.
- Report the allegation to CCYP. In circumstances where an allegation of criminal conduct is made, the Victorian Police will be informed as the first priority.
- Establish a Student Support Plan in consultation with wellbeing professionals for the victim
- Take actions required to support any other students affected by the incident.
- Conduct an investigation, subject to police clearance on criminal matters, advise the CCYP of who is undertaking the investigation and, within 30 days of the allegation, provide the CCYP with detailed information of the incident and any action taken by the school.
- Fulfil any information sharing obligations subject to the requirements of the Child Information Sharing Scheme (CISS)
- Ensure records of the allegation and outcome are completed and retained by the school.
- Report the incident and outcomes to the Board of Directors
- Employ risk management strategies to identify and mitigate future instances of child abuse
- At the conclusion of the investigation report the finding, with reasons for the outcome and any disciplinary action, to CCYP.

A staff member who makes an allegation of child abuse to school management is free to report the allegation to the appropriate government authorities regardless of the conclusion reached following an investigation conducted by school authorities.

Fulfilling the roles and responsibilities contained in these procedures does not displace or discharge any other obligations that arise if a person reasonably believes that a child is at risk of child abuse.

If you believe that a child is not subject to abuse but you still hold significant concerns for their wellbeing you must still act. This may include making a referral to or seeking advice from

- ChildFIRST/The Red Door
- DFFH Child Protection
- Victoria Police.

### **Strategies to be taken to reduce the risk of child abuse and promote child empowerment**

The Board of Directors of Penleigh and Essendon Grammar School endorses promotion of a caring, respectful and inclusive culture based on its **Policy of Mutual Respect and Behaviour Management** and **Statement of Our Behaviour**. Discussion of behavioural expectations will be held regularly with students at every level and information summarising policies displayed widely in classrooms for reference by staff and students.

In recognition of the potential for abusive situations, the Heads of Section will employ risk management strategies in monitoring the school environment and activities in which a staff member is alone with children. This may include consideration of the physical environment, including risk related to the layout of school buildings and grounds; the appropriate use of the electronic environment, including social networks, and the potential for risk during co-curricular activities.

Guidelines for appropriate communication between staff and students using electronic media are also published elsewhere. Refer to the **Code of Conduct for staff and others interacting with students** and the **Social Media Policy**.

The school will also protect children from potential abuse by requiring that a valid Working with Children Check (WCC) is provided for all staff employed by an external agency but working on school property on a regular basis or for an extended period, as well as personnel involved in student-related activities during an excursion, study tour, student exchange placement or other activity organized by the school. Where it is necessary for short-term work to be carried out on school property by a worker not holding a valid WCC, they will be accompanied by a suitable registered supervisor while on school property.

In consultation with Heads of Section the Principal will ensure that appropriate guidance will be provided to school staff at least annually about:

- individual and collective obligations and responsibilities for managing the risk of child abuse, including risks related to the actions of students 18 years or over in communication with students of less than 16 years;
- response to and management of risks related to abuse by one student of another;
- review of potential risk for child abuse in the school environment, including in online communication;
- the school's current child safety standards and Code of Conduct for staff, volunteers and others interacting with children to which all staff, contractors and volunteers must adhere and endorse annually.

Appropriate measures will be employed by the Principal to monitor and evaluate the effectiveness of the risk controls employed by the school, including an annual report to the Board of Directors of Child Safe Standards and including child safety as a regular agenda item at Board meetings.

A student safety officer will be appointed within each Section and Department of the school, reporting to the Head of Section or Department. The student safety officer will work to embed a culture of child safety by working across operations, curriculum and communications. In their role they will:

- Foster a culturally safe and inclusive environment for all students, including the ability of children of Indigenous heritage to express their culture and enjoy their cultural rights
- Champion the role of child safety by regular agenda items related to child safety at staff meetings
- Highlight the significance of child safety by regular communication with parents in newsletters and other publications
- Engage with students to ensure discussion of child safety is couched in appropriate language and can be owned by the student body
- Review child safety and situations where it is compromised in the Section in conjunction with Occupational Health and Safety personnel and assist the Head of Section to complete the annual Child Safety Risk audit

The Board of Directors requires that strategies to promote child empowerment and participation are implemented so that all students receive information in an age-appropriate and accessible form concerning child safety, prevention of abuse and how to report allegations of abuse.

Curriculum components to support development of student resilience, self-esteem and healthy and respectful relationships (including sexuality) are also included at every level.

Policies related to Child Safe Standards, the Complaints and Appeals policies for students and Complaints and Appeals Policy for parents, associates and others are published on PEGS website and community opinion will be sought in review of the school's policies and practices through regular surveys of students, staff and parents.

## **Responsibilities**

### **Board of Directors**

The Board of Directors endorses the Policy for a Child Safe School, Policy for Protection of Children and Managing the Risk of Child Abuse and Code of Conduct for staff and others interacting with students, ensuring that appropriate resources are made available to allow the policies to be effectively implemented and that the Principal and Senior Staff are held accountable for its effective implementation.

Through its Risk Management process the Board also periodically reviews the effectiveness of strategies that have been implemented to support child safety and revises these as appropriate.

### **Principal**

The Principal is responsible and will be accountable for taking all practical measures to ensure that the Policy for a Child Safe School, Policy for Protection of Children and Managing the Risk of Child Abuse and Code of Conduct for staff and others interacting with students are implemented effectively within the school. This includes strategies to mitigate the risk of child abuse.

The Principal will provide regular updates of child safety issues to the Board of Directors, including the annual audit of risks related to child safety.

The Principal will ensure that communication on child safety issues occurs between the school and student parents/guardians which reflects the needs of school families.

This will include:

- publication of the Child Safe School Policy, Policy for Protection of Children and Managing the Risk of Child Abuse and the Code of Conduct for staff and others who interact with students on the website, with among others policies,
- reminders to parents in term newsletters of our commitment to child safety
- ensuring that child safety is a regular agenda item at school leadership meetings and staff meetings for discussion.

The Principal will also ensure that strategies to promote student resilience, empowerment and participation are implemented in ways that are appropriate to students' needs.

### **Senior Staff including Heads of Section and Directors of Department**

Senior Staff are responsible for the communication of issues of child safety arising within their Section to the Principal, completion of the annual audit of risks within their Section or Department, annual training of staff concerning their obligations to uphold child safety and oversee training to support children's understanding of their rights, availability of support and how to seek assistance for themselves or others.

Senior staff will ensure that communication on child safety issues occurs between the school and student parents/guardians which reflects the needs of school families.

This will include:

- reminders to parents in term newsletters of our commitment to child safety
- ensuring that child safety is a regular agenda item at staff meetings for discussion
- discussion of child safety issues at parent information sessions
- display posters related to child safety prominently.

Senior Staff will oversee inclusion of curriculum content designed to develop student self esteem, resilience, healthy and respectful relationships (including sexuality) and mutual respect at a level suited to the cohort.

### **Student Safety Officer**

The Student Safety Officer appointed within each Section of the school is required to: complete any additional specialised training offered by the school to support their role with respect to child safety:

- to work with Senior Staff to reduce the risk of child abuse,
- to support children's understanding of their rights, safety and available support
- to support child empowerment and participation in development of a child safe school environment.

### **All Staff**

All staff are required to be familiar with our Policy for a Child Safe School, Policy for Protection of Children and Managing the Risk of Child Abuse and Code of Conduct for staff and others interacting with students.

All staff must comply with their legal obligations to report child abuse and with annual training requirements. Each individual is responsible for being aware of the key risk indicators of child abuse and raising any concerns with their Head of Section or Department, the Vice Principal or Principal.

All staff are required to fulfil training requirements as directed about child safety.

### **DEFINITIONS**

**1. school staff** means:

in a non-Government school, an individual working in a school environment who is:

1. (i) directly engaged or employed by a school governing authority;
2. (ii) a volunteer or a contracted service provider (whether or not a body corporate or any other person is an intermediary); or
3. (iii) a minister of religion.

**2. child** means a child enrolled as a student at the school

**3. child-connected work** means work authorised by the school governing authority and performed by an adult in a school environment while children are present or reasonably expected to be present

**4. child abuse** includes

- (a) any act committed against a child involving
  - (i) a sexual offence; or
  - (ii) an offence under section 498(2) of the *Crimes Act 1958* (grooming);

and

- (b) the infliction, on a child, of
  1. physical violence; or
  2. serious emotional or psychological harm; and
- (c) serious neglect of a child.

**5. school environment** means any physical or virtual place made available or authorised by the school governing authority for use by a child during or outside school hours, including:

- (a) a campus of the school;
- (b) online school environments (including email and intranet systems); and
- (c) other locations provided by the school for a child's use (including, without limitation, locations used for school camps, sporting events, excursions, competitions, study tours and other events).

## **References**

Ministerial Order No 870 - Child Safety Standards- Managing the risk of child abuse in schools

New Child Safe Standards, <https://ccyp.vic.gov.au/news/new-child-safe-standards-start-in-victoria-on-1-july-2022-to-better-protect-children/>

## **Related Policies**

- Australian Indigenous Populations and Affairs Policy
- Code of Conduct for staff, volunteers and others interacting with students
- Complaints and Appeals Policy for Students
- Individual Needs Policy
- Policy of Mutual Respect and Behaviour Management
- Policy for Protection of Children and Managing the Risk of Child Abuse
- Privacy Policy
- Social Media Policy
- Statement of Our Behaviour