Investigator College

Child Safe Policy

Child Safe Policy

The Child Safe Policy has been developed in accordance with and implements *Principle 1* of the *National Principles for Child Safe Organisations* (National Principles).

The Child Safe Policy is published on our College public website and made available to all Staff, Direct Contact Volunteers and Direct Contact Contractors.

PURPOSE

The Child Safe Policy demonstrates the College's strong commitment to creating and maintaining a child safe and child friendly environment, and to complying with the *National Principles for Child Safe Organisations* (National Principles) and non-government school registration requirements relevant to child safety and child protection. It summarises the policies and practices that we have developed to keep our students safe, including from abuse and other harm.

The Child Safe Policy outlines the key elements of our approach to:

- implementing the National Principles
- complying with all laws, regulations and standards relevant to child safety in South Australia, including the *Children and Young Persons (Safety) Act 2017 (SA)*
- complying with the Department for Education's *Protective practices for staff in their interactions with children and young people: Guidelines for staff working or volunteering in education and care settings* (Protective Practices), *Managing allegations of sexual misconduct in SA education and care settings* (Managing Sexual Misconduct), *Sexual behaviour in children and young people: Procedure guidelines and resources* (Sexual Behaviour Guidelines), and *Responding to online safety incidents in South Australian Schools* (Managing Online Safety Incidents) guidelines
- creating a safe, supportive and child-friendly College environment
- promoting the open discussion of child safety issues within the College

It informs the College community about everyone's obligations to act safely and appropriately towards students and guides the policies, processes and practices for the safety, wellbeing and protection of students across all areas of our work.

STATEMENT OF COMMITMENT TO CHILD SAFETY

Investigator College is committed to providing education and care to children and young people to assist them to develop into high achieving, supported students, positively connected to each other and to the communities in which they live and in which they will serve.

All children and young people who come to Investigator College have a right to feel and be safe. We are committed to providing a child safe and child friendly environment, where children and young people can actively participate in decisions that affect their lives.

We have zero tolerance for harm to children and young people and are committed to acting in students' best interests and keeping them safe from harm.

The College regards its child safe responsibilities with the utmost importance and is committed to providing the necessary resources to maintain a child safe culture and ensure compliance with all relevant child safe organisation and child protection laws and regulations.

Each member of the College community has a responsibility to understand the important and specific role that they play individually and collectively to ensure that the wellbeing and safety of all students is at the forefront of all that they do and every decision that they make.

PRINCIPLES

Child Safe Principles

The College's commitment to child safety is based on the National Principles, which set out the following overarching principles that guide the development and regular review of our work systems, practices, policies and procedures to protect students from harm.

The National Principles for Child Safe Organisations

The National Principles were developed by the Australian Human Rights Commission in response to recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse. The National Principles are comprised of 10 Principles that were informed by, but go further than, the 10 Child Safe Standards recommended by the Royal Commission. They are:

Australian Human Rights Commission, National Principles for Child Safe Organisations

POLICY

Scope

The Child Safe Policy promotes the safety and protection of all students at the College.

It applies to all adults in the College community, including Staff, Volunteers, Contractors (including External Education Providers) and Visitors (including parents/carers and other family members when they are on College grounds, attending a College event or in a College environment).

It applies in all College environments, including physical and online environments, and on-site and off-site College grounds (e.g. camps and excursions, and interstate and overseas travel).

Roles and Responsibilities

Child safety is everyone's responsibility. All adults in the College community have a shared responsibility for contributing to the safety and protection of students.

Of particular importance to this Policy is the role of the Child Protection Officer. Additional roles and responsibilities are summarised in the Procedures subsection at the end of this Policy.

The College's Child Protection Officers

The College has nominated a number of senior staff members as the College's Child Protection Officers. They receive additional specialised training about child safety and protection issues.

They:

- can support Staff, Volunteers and Contractors making a report to the Child Abuse Report Line (CARL) (if required)
- are a point of contact for raising child safety concerns within the College, subsequent to reporting directly to CARL
- champion child safety within the College
- assist in coordinating responses to child safety incidents
- ensure that the College responds appropriately to students involved in child safety incidents and concerns
- provide assistance and advice to other members of the College community who receive or make a disclosure about harm to a child or young person.

Our Child Protection Officer/s are:

- all members of the Senior Leadership Team
- College Counsellors

The Senior Child Protection Officer

The College has also appointed John Robinson as the College's Senior Child Protection Officer. They can be contacted by phone on (08) 8551 0900 or by emailing cpo@investigator.sa.edu.au.

The Senior Child Protection Officer has additional child safe responsibilities, such as being a first point of contact for all child safety concerns or queries for the wider community and coordinating the College's response to child safety incidents in consultation with the Senior Leadership Team and College Board.

Child Safe Codes of Conduct

The College's Child Safe Code of Conduct sets boundaries and expectations for appropriate behaviours between adults associated with the College and students, including in physical and online environments.

We also have a Student Code of Conduct, which includes child safe standards of behaviour for students.

Together, we refer to these as the Child Safe Codes of Conduct.

The Child Safe Codes of Conduct include clear processes to report inappropriate behaviour. We publish the Child Safe Codes of Conduct on our public website so that everyone can easily find out what behaviours are acceptable and unacceptable at our College and how to report inappropriate behaviour.

We also provide additional information about the Child Safe Codes of Conduct to students and families, to ensure that they know what behaviours are acceptable and unacceptable and how to report inappropriate behaviour.

Children and Young People's Rights to Safety, Information and Participation

Investigator College is a child safe and child-centred organisation. We ensure that our physical and online environment is friendly and welcoming to all children and young people.

We actively seek to include students in decisions that affect them. This includes decisions about organisational planning, delivery of services, management of facilities, and learning and assessment environments. We do this through

- Student Leaders
- Student Representative Council

as well as informal mechanisms such as

- contacting their Class/Home Group Teachers and/or relevant Head of School
- suggestions box

We ensure that students know about their rights to safety, information and participation, through age-appropriate education, and by providing age-appropriate, simple, and accessible information to students about how to raise, and the College's procedures for responding to, child safety concerns.

We recognise the importance of and have implemented specific strategies to support friendships and support from peers. We actively seek to understand what makes students feel safe in our College and regularly communicate with students about what they can do if they feel unsafe.

Parents/Carers, Families and Community Involvement at the College

The College recognises that parents and carers have the primary responsibility for the upbringing and development of their children. We ensure that they have opportunities to participate in decisions affecting their children.

In addition, we:

- ensure that families and relevant communities (the variety of communities that are relevant to the College, such as Aboriginal and Torres Strait Islander communities, culturally and linguistically diverse communities, and other communities that make up our Staff and student cohorts) know about the College's operations and policies, including this Child Safe Policy and the Child Safe Codes of Conduct, record keeping practices, risk management, and complaints and investigation processes
- actively seek to include families and relevant communities in decisions about organisational planning, delivery of services, management of facilities, and learning and assessment environments
- build cultural safety at the College through partnerships with relevant communities.

Cultural Safety and Valuing Diversity in the College Community

The College values diversity and does not tolerate any discriminatory practices. To achieve this, we:

- support the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students and their families
- support the cultural safety, participation and empowerment of students from culturally and linguistically diverse backgrounds and their families
- support students with disability and their families and act to promote their participation
- support other vulnerable students and their families (such as students who are unable to live at home or students and family members who identify asLGBTQIASB+) and act to promote their participation
- seek to recruit a workforce that reflects a diversity of cultures, abilities and identities
- ensure that all Staff and relevant Volunteers and Contractors have training about Aboriginal and Torres Strait Islander cultures, disability, culturally and linguistically diverse backgrounds, and those with particular experiences or needs
- have a physical environment that actively celebrates diverse cultures and recognises cultural difference
- commit to ensuring that our facilities promote the inclusion of students of all abilities.

We also recognise that some children and young people face additional vulnerabilities to harm, as well as additional barriers to disclosing child safety incidents or concerns. We:

- provide guidance to Staff, and relevant Volunteers and Contractors, about identifying additional vulnerabilities/barriers; and
- implement strategies for supporting students who face additional vulnerabilities/barriers to participate in the College community and for enabling them to disclose child safety incidents or concerns to the College.

Child Safe Human Resources Management

Recruitment and Screening

The College applies best practice standards to engage the most suitable and appropriate people to work with our students. Our practices include:

- making our commitment to child safety and wellbeing clear in recruitment advertising and documentation
- meeting the requirements of the *Child Safety (Prohibited Persons) Act 2016 (SA)* by:
    - requiring all Staff, Direct Contact and Regular Volunteers and Direct Contact Contractors at the College to have a current *Working with Children Check (WWCC)*, be "not prohibited" from working with children, and renew their WWCC every five years, in order to work or volunteer at the College

    - being registered with the DHS Screening Unit and linking all WWCCs
    - verifying the accuracy of all WWCCs with the DHS Screening Unit, before employing or engaging a staff member, Direct Contact /Regular Volunteer or Direct Contact Contractor, and again every five years, as required by law
    - advising the DHS Screening Unit when the College becomes aware of certain information relevant to WWCCs about any staff member, Volunteer or Contractor (such as serious criminal offences, child protection information, and disciplinary/misconduct information)
- using additional selection criteria, background checking and screening processes for all Staff, and for relevant Volunteers and Contractors, that take into account child safe considerations.

Training On and Information About the Child Safe Program

As a part of Investigator College's induction process, all Staff, as well as relevant Volunteers and Contractors, must complete our child safe induction program, which includes:

- *Responding to Risks of Harm, Abuse and Neglect – Education and Care (RRHAN-EC)* training, provided by the Department for Education
- an induction in our child safe policies, practices and procedures.

All Staff, as well as relevant Volunteers and Contractors, must also complete refresher and ongoing child safe training at least annually, and refresher RRHAN-EC training every three years.

Our child safe induction and ongoing training programs include information about:

- this Child Safe Policy
- the Child Safe Codes of Conduct
- recognising harm and identifying key indicators, including harm caused by other children and young people
- our policies and procedures for responding to and reporting (both internally and to external authorities) all child safety incidents and concerns, including mandatory reporting obligations
- our policies and procedures for information sharing and record keeping about child safety incidents and concerns
- Working with Children Checks, and other child safe human resources practices.

The College provides all Visitors to the College, including Casual Volunteers and Contractors, with information about the Child Safe Code of Conduct and how to report child safety incidents or concerns to the College and to relevant external authorities.

Ongoing Supervision, Management and Support

The College's Child Protection Officers, Senior Leadership Team and/or an appointed Business Manager provide supervision and support to all Staff, Direct Contact/Regular Volunteers, and Direct Contact/Regular Contractors to ensure that they comply with the College's approach to child safety and wellbeing.

Our child safe supervision and support program includes:

- immediately contacting the DHS Screening Unit when we become aware of information regarding any staff member, Volunteer or Contractor that is relevant to their WWCC (such as serious criminal offences, disciplinary information or other misconduct or child safe information)
- annual performance reviews for all staff members
- appointing a supervising staff member to Direct Contact Volunteers/Contractors and to those Regular Volunteers/Contractors who work when students are present or expected to be present
- professional development programs for Staff that include child safe education.

Complaints and Reporting Processes

Reporting Harm or Risk of Harm

Investigator College fosters a culture that encourages everyone in the College community to raise concerns and complaints about child safety. We have:

- clear pathways for raising child safe-related complaints and concerns with the College, set out in the Procedures below; and
- clear procedures that all Staff, Volunteers and Contractors must follow whenever they witness, suspect or receive a complaint about a child safety incident or concern involving a student, a staff member, a Volunteer, a Contractor or the College, set out in the Responding and Reporting Obligations (Child Safe) Policy and Procedures.

These pathways and procedures make clear that all Mandated Notifiers at the College must report a child safety incident or concern to CARL in the first instance if it reaches the threshold for Mandatory Reporting to the Department for Child Protection (Department for Child Protection's). They also make clear that anyone can, at any time, report a child safety incident or concern directly to CARL and/or the Police.

These pathways and procedures are also summarised for students, parents/carers and other members of the College community in the Procedures for Managing Child Safety Incidents or Concerns Involving the College or its Staff Members (Summary) which is available on our public website.

The College's Response to Child Safety Incidents or Concerns

The College will take appropriate, prompt action in response to all child safety incidents or concerns, including:

- complaints, allegations or disclosures of harm or risk of harm
- breaches of the Child Safe Codes of Conduct
- inappropriate behaviour by Staff, Volunteers, Contractors, students, parents/carers or anyone else

whenever these are reported to the College.

The safety and wellbeing of the student/s involved in the matter will be the paramount consideration when responding to child safety incidents and concerns. The College follows the National Office of Child Safety's *Complaint Handling Guide: Upholding the rights of children and young people* when investigating and responding to child safety incidents and concerns.

The College's response will include:

- reporting all matters that meet the relevant thresholds externally (if not already reported) to CARL, the Police and/or the Teachers Registration Board, depending on the issues raised
- fully cooperating with any resulting investigation by an external agency
- complying with the Department for Education's Protective Practices, Managing Sexual Misconduct, Sexual Behaviour Guidelines and Managing Online Safety guidelines
- protecting any student connected to the child safety incident or concern until it is resolved and providing ongoing support to those affected
- taking particular measures in response to child safety incidents or concerns about an Aboriginal or Torres Strait Islander student, a student from a culturally and linguistically diverse background, a student with disability, and other vulnerable students (such as a student who is unable to live at home or a students who identifies as LGBTIQASB+)
- sharing information with, or requesting information from, external people or agencies as permitted or required by law
- securing and retaining records of the child safety incident or concern and the College's response to it
- taking broader actions to improve child safety at the College (including systemic reviews and resulting improvements).

Child Safe Risk Management

Investigator College recognises the importance of a risk management approach to child safe and to minimising the risk of harm to children and young people in all College environments, without compromising their rights to privacy, access to information, social connections and learning opportunities.

We have a Risk Management Policy and Procedures to assist in the identification, assessment and management of child safety risks in all College environments.

We identify, assess and manage child safe risks in all College environments, based on a range of factors including the nature of our College's activities, its physical and online environments and the characteristics of our student cohort.

We use this information to inform our policies, procedures and activity planning.

Examples of the child safe risk areas identified, and the actions that we take to minimise and manage them includes but is not limited to:

- privacy, confidentiality and data protection
    - restricted access to personal and sensitive information stored electronically
    - secure document destruction
- student supervision
    - supervision by Investigator College staff during school hours
    - all rooms offer direct line of site
    - no transportation of students by Investigator College staff members unless specifically approved
    - supervision until the point of pick-up following after school activities
- off-site activities including camp, excursions and school events
    - consent by caregiver/s is mandatory for attendance
    - students will not be left under the supervision of unauthorised persons
    - comprehensive risk assessments completed for all camps/excursions
- first-aid/medical management
    - consent given by caregivers prior to medication administered
    - all staff trained in first aid, anaphylaxis and a cohort of staff with diabetic training
    - complete documentation of medical/injury incidents and any medication administered
    - parent notification for all head injuries
- bullying including cyber-bullying
    - appropriate supervision provided for all online activities
    - appropriate education around cyber-bullying
    - wellbeing leaders and coordinator positions with a key focus on student wellbeing

Child Safe Privacy, Information Sharing and Record Keeping

The College collects, uses and discloses information about students and their families in accordance with federal and South Australian privacy laws and other relevant laws, including laws that permit the College to disclose information about child safety to external people and agencies. For information about how the College collects, uses and discloses this information, refer to the Privacy Policy and Procedures.

In particular, the College is committed to best practice record keeping about child safety incidents and concerns.

The College records all internal and external reports of child safety incidents and concerns, as well as any other responses by the College.

When keeping records of child safety incidents or concerns, the College maintains confidentiality and privacy for students and families in accordance with federal and South Australian privacy legislation.

Child Safe Program and Practice Review

Investigator College is committed to the continuous improvement of our child safe policies, procedures and practices. We review the policies and procedures that make up our Child Safe Environments Compliance Statement every five years (or earlier if a significant child safety incident occurs at the College or legislation changes) for overall effectiveness and to ensure compliance with all child protection and child safety related laws, regulations and standards.

We review the remaining policies and procedures in our Child Safe Program (explained in the Procedures below) biennially.

When undertaking these reviews, the College:

- actively seeks, actions, and incorporates feedback from students, families, the wider College community, Staff, Volunteers and Contractors
- analyses complaints, concerns and child safety incidents that may have occurred
- communicates any adjustments or amendments to policy and practice widely throughout the College community.

The College has lodged a Child Safe Environments compliance statement with the Department of Human Services. It lodges further compliance statements whenever any policy included in the Child Safe Environments Compliance Statement is reviewed, updated or amended, which must occur at least every five years.

COMMUNICATION

Investigator College is committed to communicating our child safety strategies, policies and procedures to the College community. We do this through the measures set out in the Implementation subsection below. We also publish important documents on our public facing website and communicate to the College community via email, text message and social media platforms.

PROCEDURES

Reporting Child Safety Incidents or Concerns

If you are concerned that a child, young person or student aged 18 or over is in immediate danger, call the Police on 000.

Any person, including all Staff, Volunteers, Contractors, parents/carers and students, can at any time contact CARL if they suspect that a child or young person (aged under 18) is being or has been harmed or is at risk of harm.

You can contact CARL on 13 14 78 or online (if you are registered for online reporting). CARL is open 24 hours a day, seven days a week.

If you need guidance or support when making a report, or have questions regarding child safety, contact a Child Protection Officer.

Staff, Volunteers and Contractors

All Staff, Volunteers and Contractors must follow the Responding and Reporting (Child Safe) Policy and Procedures.

In particular:

- the following people are Mandated Notifiers and must report reasonable suspicions about harm or risk of harm to a child or young person directly to CARL (or to the Police if the child or young person is at immediate risk):
- members of College Board
- the Principal and Senior Leadership Team
- teachers, including student teachers
- all other College staff who provide services directly to students
- College Counsellors
- Direct Contact Volunteers
- Direct Contact Contractors
- a minister of religion
- a manager or supervisor of roles at the College that provide services directly to students

All Staff, Volunteers and Contractors who are adults (aged 18 or over) must:

- report the sexual abuse of any child or young person by other current or former Staff, Volunteers or Contractors directly to the Police
- take steps to protect students from sexual abuse by current Staff, Volunteers and Contractors

All Staff, Volunteers and Contractors must also, after fulfilling their legal obligations to report harm or risk of harm to CARL and/or to Police as their first priority, report all child safety

incidents or concerns internally to a Child Protection Officer, the Principal or, if the incident or concern involves the Principal, to the Board Chair (boardcomms@investigator.sa.edu.au) by email at: boardcomms@investigator.sa.edu.au.

Students, Parents/Carers and Community Members

Students at the College who have child safety concerns about themselves or any other child, young person or student aged 18 or over can:

- contact the Police on 000
- contact CARL on 13 14 78 (if they or a child or young person (aged under 18) is or has been harmed or is at risk)
- disclose the child safety incident or concern to a College Child Protection Officer
- disclose the child safety incident or concern to any other staff member, Volunteer or Contractor. This might be done:
    - verbally
    - in writing
    - through electronic means (such as email)
    - indirectly (such as in written assignments, in artworks or in any other way)
    - anonymously, using the College's Anonymous Feedback Box (locked mailbox), which is located outside Student Services (central administration building), or
    - via various local supports (such as Headspace).

Parents/carers, family members and other community members who have child safety concerns or who suspect that a child or young person associated with the College, or a student aged 18 or over, is being or has been harmed or may be at risk of harm should immediately:

- contact the Police if they are concerned that a child, young person or student aged 18 or over is in immediate danger
- contact CARL on 13 14 78 (if they suspect that a child or young person (aged under 18) is being or has been harmed or is at risk of harm).

After contacting the Police or CARL, or if they need guidance or support when contacting the Police or CARL, they can contact:

- the Principal, who is the College's Senior Child Protection Officer, by phoning 08 8551 0900 or emailing cpo@investigator.sa.edu.au
- if the concern relates to the Principal, the Board Chair (boardcomms@investigator.sa.edu.au) by email at: boardcomms@investigator.sa.edu.au.

Any person can also contact the Principal or the Board Chair (boardcomms@investigator.sa.edu.au) if they have concerns regarding the College's leadership in relation to child safety.

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

Responding to and External Reporting of Child Safety Incidents or Concerns

The Responding and Reporting Obligations (Child Safe) Policy and Procedures sets out the procedures that the College will follow when notified of any child safety incident or concern that occurs at or involves the College or that involves a student, staff member, Volunteer, Contractor, Visitor or any other person connected to the College.

It also provides guidance for all Staff, Volunteers and Contractors on their obligations to respond to child safety incidents and concerns and to report them to relevant external authorities. These obligations include:

- their duty to protect students
- mandatory reporting to Department for Child Protection's (via CARL)
- mandatory reporting to the Police (the Failure to Report offence)
- reporting to Department for Child Protection's or the Police in other situations where a student has been or is being harmed
- reporting teacher misconduct to the Teachers Registration Board.

Support for Students, Families and Staff Following Child Safety Incident or Disclosure

Child safety incidents or concerns can cause trauma and significantly impact on the mental health and wellbeing of children, young people, and students aged 18 or over, as well as on their families. In addition to reporting and referral to the relevant authorities, the College plays a central role in addressing this trauma and has a duty of care to ensure that students feel safe and supported at the College.

The College employs a range of measures to support students affected by a child safety incident or concern, depending on the particular circumstances of the matter and of the student and their family:

- Child Protection Officers may work with the student and their family to develop a student Support Plan
- support strategies that could be considered for students and/or their families might include offering or organising referrals to internal or external support, such as a College Counsellor, bi-cultural workers and/or translators, or an external support agency and/or child advocacy organisation that specialises in supporting children and young people impacted by harm.

The College offers similar support to former students who disclose historical child safety incidents or concerns from their time at the College.

Witnessing a child safety incident or receiving a disclosure of harm or risk of harm can be a distressing experience for Staff, Volunteers and Contractors involved. The College assists impacted Staff, Volunteers and Contractors to access necessary support.

Embedding a Culture of Child Safety: Our Child Safe Program

We call the full collection of the College's child safe policies and procedures the "Child Safe Program". It is itself one of the strategies employed by Investigator College to embed a culture of child safety at the College.

The Child Safe Program relates to all aspects of child safety and protecting children, young people and students aged 18 or over from harm. It establishes work systems, practices, policies and procedures to create and maintain a child safe environment and culture at the College. It includes:

- policies and procedures for complying with the Protective Practices, Managing Sexual Misconduct and Managing Online Safety Incidents guidelines
- Child Safe Codes of Conduct
- clear information about what is "harm" and associated key indicators of different forms of harm
- clear procedures for reporting to external agencies (including mandatory reporting to Department for Child Protection's and reporting to the Police) which make clear that all Staff, Volunteers and Contractors must, as their first priority, fulfill their legal obligations to report harm or risk of harm to a child or young person to CARL and/or the Police
- clear procedures for reporting child safety incidents and concerns internally, and for responding to incidents or allegations of harm
- strategies to support, encourage and enable Staff, Volunteers, Contractors, parents/carers and students to understand, identify, discuss and report child safety matters
- procedures for recruiting and screening members of the Senior Leadership Team, Staff, students on placement at the College, Volunteers and Contractors
- pastoral care strategies designed to empower students and keep them safe
- strategies to support and encourage the participation and inclusion of Aboriginal and Torres Strait Islander students, students from culturally and linguistically diverse backgrounds, students with disability and other vulnerable students
- child safe training
- information regarding the steps to take after a disclosure of harm or risk of harm to protect, support and assist children, young people and students aged 18 or over
- guidelines with respect to record keeping and confidentiality

- policies to ensure compliance with all relevant laws, regulations and standards (including the National Principles)
- a system for continuous review and improvement.

Additional Child Safe Responsibilities at the College

College Board

College Board is the College's governing body. It:

- ensures that the College has and implements processes to comply with its child safe legal and regulatory obligations; and
- ensures that the College has appropriate resources to effectively implement the National Principles and the Child Safe Program.

The Principal

The Principal is responsible, and will be accountable, for the operational management of the College. They are responsible for taking all practical measures to ensure that this Child Safe Policy and the College's Child Safe Program are implemented effectively and that a strong and sustainable child safe culture is maintained within the College.

The Principal is also responsible for lodging a new Child Safe Environments compliance statement with the Department of Human Services whenever this Policy, or any other policy included in our Child Safe Environments Compliance Statement is updated or amended, as set out in the Policy Statement above.

The Senior Leadership Team

Each member of the College Senior Leadership Team is responsible for ensuring that appropriate resources are made available in their area of operations to allow the College's Child Safe Program to be effectively implemented within the College, and for supporting the Principal in the practical application of the College's child safe strategies, policies, procedures and work systems.

Staff

All Staff must:

- comply with the Child Safe Policy, the Child Safe Codes of Conduct and the Responding and Reporting Obligations (Child Safe) Policy and Procedures
- be familiar with the other Policies and Procedures in the Child Safe Program; and
- understand their legal obligations with respect to the reporting of harm and risk of harm, and Working with Children Checks.

All Staff must be aware of key indicators of harm and risk of harm, be observant, meet their legal obligations to report harm and risk of harm directly to CARL and the Police, and subsequently report all child safety incidents and concerns internally to the College.

To meet these obligations, all Staff must:

- have a current Working with Children Check and be "not prohibited" from working with children, in order to work at the College (Investigator College will verify all WWCCs in the DHS Screening Portal)
- acknowledge in writing or online/electronically that they have read and understood the Child Safe Policy and Child Safe Codes of Conduct
- participate in child safe induction and ongoing training provided by the College
- follow the Policies and Procedures in the Child Safe Program
- act in accordance with the Child Safe Codes of Conduct
- identify, respond to and report child safety incidents and concerns in accordance with the Responding and Reporting Obligations (Child Safe) Policy and Procedures
- ensure that students' views are taken seriously and their voices are heard when making decisions that affect them
- implement inclusive practices that respond to the diverse needs of students
- comply with all relevant child safe human resources policies and procedures.

Volunteers and Contractors

All Volunteers and Contractors at the College are responsible for contributing to the safety and protection of students in the College environment.

To meet these obligations:

- all Volunteers and Contractors must:
    - comply with the Child Safe Policy and Child Safe Codes of Conduct
    - understand and comply with any legal obligations that apply to them with respect to the reporting of harm and risk of harm directly to CARL and the Police
    - after making any required external reports to CARL and the Police, raise all child safety incidents and concerns that involve the College with a Child Protection Officer
    - comply with all relevant child safe human resources policies and procedures
- certain Volunteers and Contractors (those who are so required by law or by the College must, as set out in the Child Safe Human Resources Management section above, have a current Working with Children Check and be "not prohibited" from working with children, in order to work or volunteer at the College (Investigator College will verify all WWCCs in the DHS Screening Portal)
- Direct Contact Volunteers and Direct Contact Contractors (and, if required by the College, other Volunteers and Contractors) must:

    - participate in child safe induction and ongoing training provided by the College or, in the case of a Contractor, provide evidence of other training
    - acknowledge in writing or online/electronically that they have read and understood the Child Safe Policy and Child Safe Codes of Conduct
    - be aware of key indicators of harm and risk of harm to children and young people.
- Direct Contact Contractors that are a business providing services to children and young people (including all External Education Providers) must:
    - provide evidence that they have lodged a Child Safe Environments Statement with the Department of Human Services prior to being engaged by the College
    - ensure that their personnel have a current Working with Children Check and are "not prohibited" from working with children, in order to work at the College (the College will either itself verify all WWCCs in the DHS Screening Portal, or may require the Contractor to do this and to provide the College with evidence of the WWCC status of every person engaged to provide the service).

For Contractors, the College may include these requirements in the written agreement between it and the Contractor.

IMPLEMENTATION

The Child Safe Policy is published on our public website.

It is provided to:

- new Staff, Direct Contact and Regular Volunteers, and Direct Contact and Regular Contractors at their induction or prior to them commencing their work at the College.
- to parents/carers on enrolment.

The College provides all Visitors to the College, including Casual Volunteers and Casual Contractors, with information about the Child Safe Policy, the Child Safe Code of Conduct and how to report child safety incidents or concerns to CARL and the Police, and subsequently to the College, through visitor induction.

The College also communicates the Child Safe Policy to Staff, Volunteers, Contractors and other members of the College community through the School's public website, the PolicyConnect (CompliSpace) portal, staff induction materials, newsletters, enrolment packs etc.

The College provides all students with a child-friendly version of the Child Safe Policy and the Statement of Commitment to Child Safety, found by requesting a copy from the administration team, and also communicates these to students through the School's public website.

BREACH

Investigator College enforces the Child Safe Policy and the Child Safe Codes of Conduct. In the event of any non-compliance, we will instigate a review that may result in a range of measures including (depending on the severity of the breach):

- remedial education
- counselling
- increased supervision
- the restriction of duties
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

DEFINITIONS

Definitions of particular terms used in the Child Safe Policy can be found in Child Safe Program Definitions.

Of particular importance to this Policy are the following key definitions:

Term	Definition
Child/Child and Young Person	The term "child" and the phrase "child and young person" refer to a person who is under the age of 18.
Student	The term "student" refers to all students enrolled at the College, including those aged 18 and above.
Harm	"Harm" is defined in section 17 of the Children and Young People (Safety) Act 2017 (SA) (Safety Act), and for the purposes of this Policy, as "physical harm or psychological harm (whether caused by an act or omission)". It includes (but is not limited to) "harm caused by sexual, physical, mental or emotional abuse or neglect". It does not matter how the harm occurs or by whom.
Child Safety Incident or Concern	Investigator College uses the phrase, "child safety incident or concern", which includes, but goes further than, the Safety Act's definition of "harm". Child safety incidents or concerns can take many forms. These include not only harm or risk of harm to a child or young person by their parents/carers, but also conduct by other people that can cause harm to a child or young person or to a student aged 18 or over. We define a "child safety incident or concern" as: • "harm", as defined in the Safety Act, to a child, a young person or a student aged 18 or over • a child or young person being "at risk", as defined in the Safety Act • a criminal offence against any child or young person, or against a student aged 18 or over,

	under the Criminal Law Consolidation Act 1935 (SA) (Criminal Law Act) • conduct by Staff, Volunteers and Contractors that may be "reportable conduct" • a breach of the Child Safe Codes of Conduct. For more information about each of these concepts, refer to the full definition of "child safety incident or concern" in the **Responding and Reporting Obligations (Child Safe) Policy and Procedures**.

SOURCE OF OBLIGATION

- Children and Young People (Safety) Act 2017 (SA), section 114
- National Principles for Child Safe Organisations
- Education and Early Childhood Services (Registration and Standards) Act 2011 (SA)
- Education and Early Childhood Services (Registration and Standards) Regulation 2011 (SA), regulation 36A
- Standards for Registration and Review of Registration of Schools in South Australia

Related Policies

- Codes of Conduct (Child Safe) Policies and Procedures
- Responding and Reporting Obligations (Child Safe) Policy and Procedures
- Sharing Information About Students' Safety, Welfare or Wellbeing Policies and Procedures
- Working with Children Checks Policy and Procedures
- WWCC Procedures for Staff
- Risk Management (Child Safe) Policy and Procedures
- Compliance, Review and Improvement (Child Safe) Policies and Procedures
- Complaints Management (Child Safe) Policy and Procedures

Related Documents

- child-friendly version of/information about the Child Safe Policy
- child-friendly version of/information about the Complaints Management (Child Safe) Policy and Procedures
- Procedures for Managing Child Safety Incidents or Concerns Involving the College or its Staff Members (Summary)
- Child Safe Risk Register

References

- Department of Human Services, Guideline to Writing a Child Safe Environments Policy
- National Office of Child Safety, Complaint Handling Guide: Upholding the rights of children and young people

Policy Administration

The College Board reviews the Child Safe Policy at least every five years, or earlier if required (such as due to changes in legislation), in light of experience, the effectiveness of its procedures and the publication of relevant research.

A new Child Safe Environments compliance statement is lodged with the Department of Human Services each time this Policy is reviewed and updated.

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