



CHILD PROTECTION AND CHILD SAFETY POLICY

Creating a child safe culture is, of course more than simply having a set of policies and procedures in place. It's about creating a culture where all staff members, volunteers and Board members take on responsibility for promoting and ensuring child safety. It's also about promoting participation and empowerment of children – giving children a voice in decision making, and not just child safety-related decisions, but organisational planning as well. When children are empowered in an organisation they are more likely to report concerns in relation to their safety (Paul Ronalds, CEO Save the Children Australia, April 2018).

Section One - Child Safety Policy

Outlines Nazareth College's policies and procedures relating to child safety. Includes principles, definitions, commitments, responsibilities, procedures, staff training, risk management, relevant legislation and related policies. It also includes appendices that provide information and guidance regarding the three new criminal offences that came into effect in Victoria on 1 August 2016, as well as the relevant ministerial order 870 and CECV commitment to Child Safety.

Section Two - Child Protection – Reporting Obligations

A detailed explanation of reporting obligations under the various pieces of relevant legislation.

Section Three - Child Safety Code of Conduct

Outlines the Code of Conduct that all members of the Nazareth College Community are expected to abide by in our efforts to safeguard students from sexual, physical, psychological, family violence, emotional abuse and neglect. It concludes with an agreement that all relevant people within the Community are asked to sign.

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NAZARETH COLLEGE CHILD PROTECTION AND CHILD SAFETY POLICY

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Section One

CHILD SAFETY



Nazareth College, as a Catholic Co-educational Secondary College in the Melbourne Archdiocese, holds the care, safety and wellbeing of children and young people as a central and fundamental responsibility of Catholic education. Our commitment is drawn from and inherent in the teaching and mission of Jesus Christ, with love, justice and the sanctity of each human person at the heart of the gospel *CECV Commitment Statement to Child Safety* (Appendix 1).

The person of each individual human being, in his or her material and spiritual needs, is at the heart of Christ's teaching - that is why the promotion of the human person is the goal of the Catholic school (Congregation for Catholic Education 1997, n. 9).

Nazareth College strives to;

- Create a faith-centred and hope-filled community inspired by the teachings of Jesus;
- Provide quality education that challenges, supports and empowers students to explore and reach their full potential;
- Foster an inclusive and safe environment;
- Build authentic partnerships between school, parents and carers and the wider Community.

Purpose of the Policy

The purpose of this policy is to demonstrate the strong commitment Nazareth College staff members, together with the School Community have to the care, safety and wellbeing of all students at the College. It provides an outline of the procedures and strategies developed to keep students safe from harm, including all forms of abuse in our school environment, on campus, online and in other locations provided by the school.

This policy takes into account relevant legislative requirements within the state of Victoria, including the specific requirements of the Victorian Child Safe Standards as set out in Ministerial Order No. 870.

This policy applies to all school staff members, including school employees, volunteers, contractors and clergy.

Principles of the Policy

Nazareth College has a moral and legal responsibility to create a nurturing school environment where children and young people are respected, their voices are heard and they are safe and feel safe *CECV Commitment to Child Safety* (Appendix 1).

The School's commitment to child safety is based on the following principles that underpin our commitment to development and regular review of our work systems, practices and procedures to protect children from abuse:

- All students deserve, as a fundamental right, safety and protection from all forms of abuse and neglect;
- The welfare and best interests of the child are paramount;
- Nazareth College works in partnership with families and the Community to ensure that they are engaged in decision making processes, particularly those that have an impact on child safety and protection;
- All students have the right to a thorough and systematic education in all aspects of personal safety, in partnership with their parents/guardians/caregivers;



- All adults in our school, including teaching and non-teaching staff, clergy, volunteers, and contractors have a responsibility to care for children and young people, to positively promote their wellbeing and to protect them from any kind of harm or abuse;
- The policies, guidelines and codes of conduct for the care, wellbeing and protection of students are based on honest, respectful and trusting relationships between adults and children and young people;
- Policies and practices demonstrate compliance with legislative requirements and cooperation with the Church, governments, the police and human services agencies;
- All persons involved in situations where harm is suspected or disclosed must be treated with sensitivity, dignity and respect;
- Staff, clergy, volunteers, contractors, parents and students should feel free to raise concerns about child safety, knowing these will be taken seriously by the Leadership Team;
- Appropriate confidentiality will be maintained, with information being provided to those who have a right or a need to be informed, either legally or pastorally;
- The views of the child and a child's privacy must be respected;
- Clear expectations for appropriate behaviour with children are established in our Child Safety Code of Conduct policy – Section Three;
- The safety of children is dependent upon the existence of a child safe culture;
- Child safety awareness is promoted and openly discussed within our School Community;
- Procedures are in place to screen all staff members, direct contact volunteers**, third party contractors and external education providers who have direct contact with children;
- Child safety and protection is everyone's responsibility;
- Child protection training is mandatory for all School Board members, staff members and direct contact volunteers**;
- Procedures for responding to alleged or suspected incidents of child abuse are simple and accessible for all members of the School Community;
- Children from culturally or linguistically diverse backgrounds have the right to special care and support including those who identify as Aboriginal or Torres Strait Islander;
- Children who have any kind of disability have the right to special care and support.

**Direct Contact Volunteers are those volunteers that are involved in providing support, guidance and supervision directly to students and could potentially have direct unsupervised contact with students during the normal course of providing the volunteer service. Examples of Direct Contact Volunteer activities may include volunteers involved in School camps and excursions, coaching sporting teams or assisting in learning activities.

Commitment to Child Safety

Nazareth College is a Child Safe School. All students enrolled at Nazareth College have the right to feel safe and be safe. The wellbeing of children in our care will always be our first priority and we do not, and will not, tolerate child abuse and remain committed to the protection of all children from all forms of abuse. We aim to create a child safe and child friendly environment where children are free to enjoy life to the full without any concern for their safety. There is particular attention paid to the most vulnerable children, including Aboriginal and Torres Strait Islander children, children from culturally and/or linguistically diverse backgrounds, and children with a disability.

Child abuse includes sexual offences, grooming, physical violence, serious emotional or psychological harm, serious neglect and a child's exposure to family violence. Nazareth College is committed to the protection of all children from all forms of child abuse and



demonstrates this commitment through the implementation of comprehensive Child Protection Policies designed to keep children safe.

At Nazareth we have a zero tolerance for child abuse and are committed to acting in children's best interests and keeping them safe from harm. The School regards its child protection responsibilities with the utmost importance and as such, is committed to providing the necessary resources to ensure compliance with all relevant child protection laws, regulations and maintain a child safe culture.

All children, regardless of their gender, race, religious beliefs, age, disability, sexual orientation, family or social background, have equal rights to protection from abuse.

General Definitions used in this policy

Child: A child or a young person enrolled as a student at the school.

Child abuse includes:

- (a) any act committed against a child involving:
 - (i) a sexual offence;
 - (ii) an offence under section 49B(2) of the Crimes Act 1958 (grooming).
- (b) the infliction, on a child, of:
 - (i) physical violence;
 - (ii) serious emotional or psychological harm.
- (c) serious neglect of a child. Ministerial Order No 870 (Appendix 2).

Child safety encompasses matters related to protecting all children from child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to incidents or allegations of child abuse. Ministerial Order No 870 (Appendix 2).

Child neglect: Includes a failure to provide the child with an adequate standard of nutrition, medical care, clothing, shelter or supervision to the extent that the health and physical development of the child is significantly impaired or placed at serious risk.

Child physical abuse: Generally, consist of any non-accidental infliction of physical violence on a child by any person.

Child sexual abuse: is when a person uses power or authority over a child to include them in sexual activity. It can include a wide range of sexual activity and does not always involve physical contact or force child protection.

Emotional child abuse: occurs when a child is repeatedly rejected, isolated, or frightened by threats or by witnessing family violence.

Grooming is when a person engages in predatory conduct to prepare a child for sexual activity at a later date. It can include communication and/or attempting to befriend or establish a relationship, other emotional connection with the child or their parent/carer.

Child protection: Statutory services designed to protect children who are at risk of serious harm.



Mandatory Reporting: The legal requirement under the Children, Youth and Families Act 2005 (Vic,) to protect children from harm relating to physical and sexual abuse. The Principal, teachers, medical practitioners, nurses and psychologists at a school are mandated reporters under this Act.

Reasonable Belief: When staff are concerned about the safety and wellbeing of a child or young person, they must assess that concern to determine if a report should be made to the relevant agency. This process of considering all relevant information and observations is known as forming a 'reasonable belief'. A 'reasonable belief' or a 'belief on reasonable grounds' is not the same as having proof but is more than mere rumour or speculation. A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds (PROTECT - Identifying and responding to all forms of abuse in Victorian Schools – Appendix 3).

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

School staff means an individual working in a school environment who is:

- (a) directly engaged or employed by a school governing authority;
- (b) a volunteer or a contracted service provider (whether or not a body corporate or any other person is an intermediary);
- (c) a Minister of Religion. (Ministerial Order No 870).

Policy Commitments

All students enrolled at Nazareth have the right to feel safe and be safe. The wellbeing of children in our care will always be our first priority and we do not, and will not, tolerate child abuse. We aim to create a child safe and child friendly environment where children are free to enjoy life to the full without any concern for their safety. There is particular attention paid to the most vulnerable children, including Aboriginal and Torres Strait Islander children, children from culturally and/or linguistically diverse backgrounds, and children with a disability. We value and celebrate diversity, especially cultural diversity, and we do not tolerate discriminatory practices.

The Victorian Charter of Human Rights and Responsibilities Act 2006 (Vic) requires Nazareth College staff to give proper considerations to human rights in making decisions and to act compatibly with human rights.

In responding to suspected child abuse, our decisions and actions give consideration to Charter rights, including:

- Promote the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students and their families;
- That every child has the right, without discrimination, to such protection as in his or her best interests and is needed by him or her by reason of being a child;



- That a person has a right, under the charter, to not have his or her privacy unlawfully or arbitrarily interfered with, in responding to suspected child abuse. It is important to properly consider a child's right to privacy, however this should not present Nazareth College from discharging our protection obligations;
- The Charter provides for protection from torture and cruel, inhumane or degrading treatment. As well as the prohibition on such conduct, there may be an obligation to take steps to prevent deliberate acts of torture or other conduct prohibited by the charter;
- Promote the cultural safety, participation and empowerment from culturally and/or linguistically diverse backgrounds (CALD) and their families;
- Promote the personal safety, participation and empowerment of students with a disability and make them feel welcome and part of all aspects of school life *Charter of Human Rights and Responsibilities Act 2006*.

Nazareth College Commitment to Child Safety

All students enrolled at Nazareth College have the right to feel safe and be safe. The wellbeing of children in our care will always be our first priority and we do not and will not tolerate child abuse. We aim to create a child safe and child friendly environment where children are free to enjoy life without any concern for their safety. There is particular attention paid to the most vulnerable children, including Aboriginal and Torres Strait Islander children, children from culturally and/or linguistically diverse backgrounds, and children with a disability.

Our Commitment to students

- We commit to the safety and wellbeing of all children and young people enrolled in our school;
- We commit to providing children and young people with positive and nurturing experiences;
- We commit to listening to children and young people and empowering them by taking their views seriously, and addressing any concerns that they raise with us;
- We commit to taking action to ensure that children and young people are protected from abuse or harm;
- We commit to teaching children and young people the necessary skills and knowledge to understand and maintain their personal safety and wellbeing;
- We commit to seeking input and feedback from students regarding the creation of a safe school environment.

Our commitment to our parents and carers

- We commit to communicating honestly and openly with parents and carers about the wellbeing and safety of their children;
- We commit to engaging with, and listening to, the views of parents and carers about our child safety practice, policies and procedures;
- We commit to transparency in our decision-making with parents and carers where it will not compromise the safety of children or young people;
- We commit to acknowledging the cultural diversity of students and families, and being sensitive to how this may impact on student safety issues;
- We commit to continuously reviewing and improving our systems to protect children from abuse.

Our commitment to our school staff

(school employees, volunteers, contractors and clergy)



- We commit to providing all Nazareth College staff members with the necessary support to enable them to fulfil their roles. This will include regular and appropriate learning opportunities;
- We commit to providing regular opportunities to clarify and confirm policy and procedures in relation to child safety and young people's protection and wellbeing. This will include annual training in the principles and intent of the Child Safety Policy and Child Safety Code of Conduct, and staff responsibilities to report concerns;
- We commit to listening to all concerns voiced by Nazareth College staff members, clergy, volunteers, and contractors about keeping children and young people safe from harm;
- We commit to providing opportunities for Nazareth College school employees, volunteers, contractors and clergy to receive formal debriefing and counselling arising from incidents of the abuse of a child or young person.

Nazareth College is fully committed to providing a safe and nurturing environment for all children and young people in our care. Our commitment accords with the Catholic Education Commission of Victoria (CECV) commitment to Child Safety (Appendix 1).

Responsibilities and Organisational Arrangements

All persons employed or volunteering at Nazareth College has a responsibility to understand the important and specific role he/she plays individually and collectively to ensure that the wellbeing and safety of all students is at the forefront of all they do and every decision they make. Child protection is everyone's responsibility.

The school has allocated formal roles and responsibilities for child safety as follows:

- Canonical Administrators, Board and College Leadership Team are responsible for the overall compliance of all aspects of Ministerial Order No. 870;
- Heads of House, Directors' of Wellbeing and Pastoral Teachers have responsibility to support the safety and wellbeing of young people;
- The College Administration team are responsible for ensuring all child safety/risk assessments/logistical organisation protocols are effectively implemented;
- Learning Leaders are responsible for ensuring that all curriculum areas have relevant and appropriate content in regard to child safety knowledge and skill development for the young people in care;
- All staff members have individual responsibility for adherence to and implementation of the Nazareth College Child Safety Policy;
- Child Safety Officers have additional training in child safety and are the first point of call for all issues related to child safety.

Responsibilities of School Leadership

The Principal, the College Board and school leaders at Nazareth recognise their particular responsibility in ensuring the development of preventative and proactive strategies that promote a culture of openness, awareness of and shared responsibility for child safety.

Responsibilities include:

- Creating an environment for children and young people to be safe and to feel safe;
- Upholding high principles and standards for all staff, clergy, volunteers, and contractors;
- Promoting models of behaviour between adults and children and young people based on mutual respect and consideration;



- Ensuring thorough and rigorous practices are applied in the recruitment, screening and ongoing professional learning of staff members;
- Ensuring that school personnel have regular and appropriate learning to develop their knowledge of, openness to, and ability to address child safety matters;
- Providing regular opportunities to clarify and confirm legislative obligations, policy and procedures in relation to child and young people's protection and wellbeing;
- Ensuring the school meets the specific requirements of the Victorian child safe standards as set out in ministerial order no. 870;
- Ensuring the school takes specific action to protect children from abuse in line with the three new criminal offences introduced under the crimes act 1958 (vic.) and in line with the Protect: identifying and responding to all forms of abuse in Victorian schools (Appendix 3).

Responsibilities of School Staff

Responsibilities of school staff members (school employees, volunteers, contractors and clergy) include:

- Treating children and young people with dignity and respect, acting with propriety;
- Providing a duty of care, and protecting children and young people in their care;
- Following the legislative and internal school processes in the course of their work, if they form a reasonable belief that a child or young person has been or is being abused or neglected;
- Providing a physically and psychologically safe environment where the wellbeing of children and young people is nurtured;
- Undertaking regular training and education in order to understand their individual responsibilities in relation to child safety and the wellbeing of children and young people;
- Assisting children and young people to develop positive, responsible and caring attitudes and behaviours which recognise the rights of all people to be safe and free from abuse;
- Following the school's child safety Code of Conduct.

Organisational Arrangements

Nazareth College's Catholic ethos is expressed in a safe and secure environment based on values of Faith, Wisdom and Knowledge, which fosters the development of the learning and faith community. The climate of Nazareth College is what we impart by our attitudes and behaviours, about the values and ethics we maintain - it is the visible expression of faith, demonstrated by our concern and care for each other, especially the young people entrusted to our Community.

Overseeing the implementation of this policy will be the Principal who will act on behalf of the Canonical Administrators of the College. It is the role of the Principal to ensure that the ethical imperative of keeping children safe is recognised, understood, valued, and upheld by all staff members, volunteers, and Community members within the school. To assist with implementation, monitoring and reviewing child safety matters, the Canonical Administrators and Principal will work closely with all staff members.

It is also the specific role of the Principal to ensure that all staff are knowledgeable of their requirements in regards to Mandatory Reporting and that they are aware that all issues need to be handled sensitively and promptly. General Staff Meetings, together with Monday and Wednesday Morning Briefings are avenues that will assist in the communication and dissemination of information that involves issues of child safety.



The Principal will also be responsible for the reviewing of school procedures in order to gauge the effectiveness of the College in managing and revising Nazareth's child safe strategies and to ensure that the policy is distributed to all members of the College Community and is visible to the wider community on our College website and through the College App and School Newsletter (The Nazarene).

The Assistant Principal Faith and Wellbeing will usually be the conduit between Government bodies such as the Department of Health and Human Services (DHHS), Child FIRST, the Police, the Court system, and the school.

At Nazareth College all members of the College Board, staff members, together with direct and indirect volunteers, have a shared responsibility for contributing to the safety and protection of children. Specific responsibilities include:

College Board (Nazareth Advisory Committee)

Each member of the College Board is required to ensure that appropriate resources are made available to allow the School's Child Protection and Safety Policy to be effectively implemented within the School and are responsible for holding the Principal and College Leadership Team accountable for effective implementation.

Principal

The Principal is responsible and will be accountable for taking all practical measures to ensure that this Child Protection and Safety Policy is implemented effectively and that a strong and sustainable child protection culture is maintained within the School.

Child Safety Officers

The Assistant Principal Faith and Wellbeing, Directors' of Wellbeing and School Counsellor have been nominated as the Schools Child Safety Officers. Our Child Safety Officers have received additional training with respect to child protection issues. They are the first point of contact for raising child protection concerns within the School. They are also responsible for championing child protection within the School and assisting in coordinating responses to child protection incidents. They can be contacted via email childsafety@nazareth.vic.gov.au

Staff Members

All staff are required to be familiar with the content of our Child Protection and Safety Policy and their legal obligations with respect to the reporting of child abuse. It is each individual's responsibility to be aware of key risk indicators of child abuse, to be observant, and to raise any concerns they may have relating to child abuse with the School's Child Safety Officers.

Direct Contact Volunteers

All Direct Contact Volunteers, are required to be familiar with the content of our Child Protection and Safety Policy (including our Child Safety Code of Conduct) and their legal obligations with respect to the reporting of child abuse. It is each individual's responsibility to be aware of key risk indicators of child abuse, to be observant, and to raise any concerns they may have relating to child abuse with one of the School's Child Safety Officers.

Indirect Contact Volunteers



Indirect Contact Volunteers are those volunteers who are involved in providing support and services whilst not directly assisting a specific group of students. Indirect contact volunteers would not have 'unsupervised' contact with students during the normal course of providing the volunteer service.

All indirect volunteers are responsible for contributing to the safety and protection of children in the school environment. All indirect volunteers are required by the school to be familiar with our Child Protection and Safety Policy. Examples of Indirect Contact Volunteer activities may include assisting with school functions, school canteen and fundraising barbeques.

Third Party Contractors

All third-party Contractors (service providers) engaged by the school are responsible for contributing to the safety and protection of children in the school environment. All service providers engaged by the school are required by the school to be familiar with our Child Protection and Safety Policy. The school only uses third party contractors that have undergone an extensive due diligence process which includes provision of our Child Protection and Safety Policy and Child Safety Code of Conduct.

External Education Providers

An external education provider is any organisation that the school has arranged to deliver a specified course of study that is part of the curriculum, to a student or students enrolled at the school. The delivery of such a course may take place on school premises or elsewhere. All external education providers engaged by the school are responsible for contributing to the safety and protection of children in the school environment. All external education providers engaged by the school are required by the school to be familiar with our Child Protection and Safety Policy. Nazareth may include this requirement in the written agreement between it and the external education provider.

House System

Organisational structures have as their objective the total climate of relationships within the school Community. It has the individual as its focus, and reflects the support, encouragement and loving care shown and experienced in the ethos of Gospel based communities. With its life-giving focus, it should enable all to grow, to be affirmed in their dignity and worth as persons, to appreciate themselves, and to develop skills and knowledge to understand and maintain their personal safety and wellbeing and to develop interpersonal relationship skills.

The College has vertical homerooms and operates a house structure to:

- Increase students' social repertoire by broadening the range of social contact they are exposed to;
- Foster connectedness to the whole school Community;
- Provide proactive measures to improve mental health, resilience, safety and wellbeing;
- Increase students' senses of responsibility for others in the school Community.

A multi-age homeroom provides an alternative peer group enabling:

- Opportunities to mix and be exposed to other intellectual, physical, social and emotional levels;
- Help to minimise the impact of adolescence, where students developmentally are more likely to have issues with regard to self-esteem, anti-social and high-risk behaviours;
- Provide extra support and connectedness;
- Expose students to caring and positive relationships rather than their usual tendency to congregate with some peers who may share similar negative issues.



Houses are supported by other teams within the College including:

- Student Support Team;
- School Counsellor;
- Careers Counsellors;
- Learning Diversity Team;
- Student Services;
- External Partnerships and referrals.

House operation is the responsibility of Heads of House, Pastoral Teachers and Subject Teachers. This Pastoral Team is convened and facilitated by the Directors of Wellbeing. All levels of College operation, including the work of house teams, subject departments, and pastoral/learning leadership teams converge in the core business of the College - working with young people in teaching and learning which is always underpinned by the wellbeing and safety of young people. These two areas are inextricably linked.

Reporting Concerns

Our Child Protection and Child Safety Policy (Section Two) provides detailed guidance for members of the Nazareth Advisory Committee, staff and Direct Contact Volunteers as to how to identify key risk indicators of child abuse and how to report child abuse concerns to one of our School's nominated Child Safety Officers. It also contains detailed procedures with respect to the reporting of child abuse incidents to relevant authorities.

Third party contractors, external education providers, indirect contact volunteers, students, parents/guardians or other Community members who have concerns that a child may be subject to abuse are asked to contact one of the School's Child Safety Officers.

Our Child Safety Officers may be contacted via School Reception on **97958100** or email **childsafety@nazareth.vic.edu.au**.

Communications will be treated confidentially on a 'need to know basis' and all personal information will be dealt with in accordance with the Nazareth College Privacy Policy.

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

Expectation of School Staff – Child Safety Code of Conduct

At Nazareth College we expect school employees, volunteers, contractors and clergy to proactively ensure the safety of students at all times and to take appropriate action if there are concerns about the safety of any child at the school. All school staff must remain familiar with the relevant laws, the Code of Conduct, and policies and procedures in relation to child protection and to comply with all requirements. We have developed a Child Safety Code of Conduct, which recognises the critical role that school staff play in protecting the students in our care and establishes clear expectations of school employees, volunteers, contractors and clergy for appropriate behaviour with children in order to safeguard them against abuse and or neglect. Our Code also protects school staff through clarification of acceptable and unacceptable behaviour.

Student Safety and Participation

The Nazareth College organiser contains information for students to seek support both during and after school hours. The guiding principles for all teachers is School Wide Positive Behaviour Support School which is a framework that brings together school communities to develop positive, safe, supportive learning cultures. Staff and students understand that all



poor choices are opportunities for growth and learning, and we all have both personal and communal rights and responsibilities. This is the basis of all interactions. Nazareth also promotes a Child Safe school environment through college, house and year level assemblies. Curriculum programmes are also regularly reviewed to ensure that all aspects of the Child Safety requirements are addressed across all year levels.

At Nazareth College we actively encourage all students to openly express their views. We listen to their suggestions, especially on matters that directly affect them. We actively encourage all students to express their views and feel comfortable about giving voice to the things that are important to them. We teach students about what they can do if they feel unsafe and enable them to understand, identify, discuss and report on child safety. We listen to, and act on, any concerns students, or their parents/guardians raise with us.

To empower students in looking after their own safety, bodies such as the Heads of House, Directors of Wellbeing and School Counsellor meet regularly with the Assistant Principal Faith and Wellbeing and the Student Leaders to voice concerns or forward suggestions that can make Nazareth a safer learning environment. Students can also directly approach the Principal, Deputy Principal, Assistant Principal, Heads of House, Pastoral Teachers, Subject Teachers, First Aid Officer or School Counsellor to seek advice or receive assistance.

Reporting and Responding

Nazareth College record any child safety complaints, disclosures or breaches of the Child Safety Code of Conduct, and stores the records in accordance with security and privacy requirements. Our school complies with legal obligations that relate to managing the risk of child abuse under the *Children, Youth and Families Act 2005* (Vic.), the *Crimes Act 1958* (Vic.) and the recommendations of the Betrayal of Trust Report.

Child protection reporting obligations fall under separate pieces of legislation with differing reporting requirements. Nazareth College adopts the CEM Policy 2.19 Child Protection - Reporting Obligations (appendix 7). This policy sets out the actions required under the relevant legislation when there is a reasonable belief that a child at our school is in need of protection or a criminal offence has been committed, and provides guidance and procedures on how to make a report.

This policy assists staff, volunteers and families to:

- Identify the indicators of a child or young person who may be in need of protection;
- Understand how a 'reasonable belief' is formed;
- Make a report of a child or young person who may be in need of protection;
- Comply with mandatory reporting obligations under child protection law and their legal obligations relating to criminal child abuse and grooming under criminal law.

Nazareth College has also established internal processes to ensure that appropriate action is taken to respond to concerns about the wellbeing and/or safety of a student. Nazareth College also has formal avenues for complaints and disclosure processes, which are outlined and detailed in the Nazareth College Complaints Policy

In accordance with the relevant legislation, any school employee, volunteer, contractor or religious cleric employed by or affiliated with Nazareth College who has evidence that a student has been abused **MUST** report the matter immediately to the relevant authority or authorities, and to the Nazareth College Child Safety Officers.



Our school's **Child Protection and Child Safety Policy – Section Two** sets out the actions required under the relevant legislation when there is a reasonable belief that a child at our school is in need of protection or a criminal offence has been committed, and provides guidance and procedures on how to make a report.

Our policy assists staff to:

- Identify the indicators of a child or young person who may be in need of protection;
- Understand how a 'reasonable belief' is formed;
- Make a report of a child or young person who may be in need of protection;
- Comply with mandatory reporting obligations under child protection law and their legal obligations relating to criminal child abuse and grooming under criminal law.

Our school has also established internal processes to ensure that appropriate action is taken to respond to concerns about the wellbeing and/or safety of a student. Nazareth College, in partnership with families, will ensure children and young people, are engaged and active participants in decision making processes, particularly those that have an impact on their safety. This means that the views of staff, children, young people and families are taken seriously and their concerns are addressed in a just and timely manner. Children and young people are also provided with the necessary skills and knowledge to understand and maintain their personal safety and wellbeing.

To ensure all concerns, suspicions and allegations of harm to a child the College Leadership Team, as directed by the Canonical Administrator will:

- Have four designated Child Safety Officers whose role is to receive all complaints made by staff, volunteers, parents or children (Assistant Principal, Directors of Wellbeing and School Counsellor);
- Handle complaints in line with existing College Policies.

Third party contractors, external education providers, indirect contact volunteers, students, parents or other Community members who have concerns that a child may be subject to abuse are asked to contact one of the School's Child Safety Officers. Our Child Safety Officers can be contacted by calling 9795 8100 or emailing childsafety@nazareth.vic.edu.au. Communications will be treated confidentially on a 'need to know basis' and all personal information will be dealt with in accordance with the School's Privacy Policy.

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

Screening and Recruitment of School Staff

Nazareth will apply the most thorough and rigorous screening processes in the recruitment of employees and volunteers involved in child connected work as outlined in our Staff Screening and Recruitment Policy (Appendix 8) and our Induction Policy (Appendix 9). We interview and conduct referee checks on all staff and volunteers and require police checks, VIT and Working With Children Checks (WWCC) for all staff and volunteers. Our commitment to Child Safety and our screening requirements are included in all advertisements for staff and volunteer positions and all applicants are provided with copies of the school's Child Safety Code of Conduct and the Child Protection and Child Safety Policy.

Recruiting



When recruiting and selecting employees, contractors and volunteers involved in child connected work, we make all reasonable efforts to:

- Confirm the applicant's Working with Children Check and National Police Check status and/or professional registration (as relevant);
- Obtain proof of personal identity and any professional or other qualifications;
- Verify the applicant's history of work involving children;
- Obtain references that address the applicant's suitability for the job and working with children.

We have processes for monitoring and assessing the continuing suitability of school staff to work with children, including regular reviews of the status of Working with Children Checks and staff professional registration requirements such as Victorian Institute of Teaching (VIT) registration.

Child protection - Working with Children

DEFINITIONS

For the purposes of the Working with Children Act 2005:

Children are those under the age of 18 years

Child related work is work involved in one of the occupational fields listed in the Act, and that 'usually' involves direct contact with a child and that contact is not directly supervised by another person

Note: 'Work is not child-related work by reason only of occasional direct contact with children that is incidental to the work.'

Direct contact is any contact between a person and a child that involves:

- physical contact;
- face to face oral communication.

Direct supervision is supervision of a person's contact with children, rather than of their work, in general. Supervising another person's contact with children must be personal and immediate but can include a brief absence such as taking a telephone call in another room.

This policy applies to the whole school Community in supporting safe environments for all children and young people. The Principal of Nazareth College will ensure all relevant people have applied for the WWCC assessment. All relevant staff, (including all non teaching staff, contractors, self-employed persons, volunteers and members of the Advisory Committee) are responsible for obtaining their own check, but Nazareth will ensure valid checks are held by all members of staff.

This policy applies to the whole school Community in supporting safe environments for all children and young people. It concerns the responsibilities of schools in complying with the provisions of the Victorian *Working with Children Act 2005*, which was enacted to assist in protecting children from sexual or physical harm by ensuring that people who work with, or care for, them are subject to a screening process. Working With Children Act 2005, s.1(1).

- A Working with Children Check (WWCC) is required of most people involved in twenty occupational fields of child related work as paid workers or volunteers - where that work is not directly supervised by someone with an appropriate check;



- Current members of the Victorian Institute of Teaching are exempt from requiring a WWCC as they already undergo a similar regular check as part of their VIT;
- Clergy and those performing duties of a religious vocation are specifically identified as requiring checks. A school will need to see the WWCC for these people as well, including the Canonical Administrators;
- Sporting clubs also fall within these twenty occupational fields. Schools should consider how they will ensure associated sporting clubs manage their responsibilities;
- A check is required of people working in schools, including employees, volunteers and self employed persons, as well as officers of a body corporate, members of committees of management, and persons involved in practical training, eg student teachers. There are some exceptions to this requirement, and Nazareth understands and incorporates these requirements into their procedures and practices;
- While staff are responsible for obtaining their own check, Nazareth ensures checks are held by all those requiring one and keep an ongoing record of this. Nazareth also ensures all teaching staff maintain their registration with the Victorian Institute of Teaching and regularly checks these records.

Note: A Working with Children Check is a minimum requirement of a school's Duty of Care – it provides evidence that a person has not been found guilty of sexual abuse. It does not endorse any person as being suitable to work with children. Systematic and rigorous screening processes are also undertaken to reduce as much as possible the risk of harm to any student.

The following processes are in place to ensure compliance and up to date records of WWCC checks are maintained:

- Copies of non teaching staff WWCC assessment will be placed in their personal file;
- The Assistant to the Principal (or delegate) will keep accurate and up to date records of all relevant staff, (includes all paid non teaching staff, contractors, self employed persons, volunteers and members of the Advisory Committee) validity of WWCC assessment;
- WWCC records are kept in a secure file, reviewed on a quarterly basis. Those who are exempt from a WWCC are included in this Register with appropriate notation;
- All teachers must provide a copy of their current VIT registration card prior to commencing work;
- No person without a WWCC or current VIT registration can work unsupervised with children. A teacher without current registration must immediately apply for a WWCC before they can be in the school, and cannot work as a teacher until registration is renewed;
- An up to date VIT Register for teachers, other staff, contractors, and volunteers is kept in a secure file and maintained by the Assistant to the Principal (or delegate);
- Selection and appointment processes for staff and volunteers require submission of evidence and active assurance of VIT registration or WWCC prior to engagement;
- The VIT and Department of Justice websites are checked each term to ensure all registrations and WWCCs continue to be current;
- All staff are made aware each year (including during induction) of, understanding and implementing the school's procedures in regard to volunteers and other persons, including the need for prior approval of by the Leadership Team.

Child Safety – Education and Training for School Staff

Nazareth provides employees, volunteers and clergy with regular and appropriate opportunities to develop their knowledge of, openness to and ability to address child safety



matters. This includes induction, ongoing training and professional learning to ensure that everyone understands their professional and legal obligations and responsibilities, and the procedures for reporting suspicion of child abuse and neglect.

The Nazareth College Leadership Team outline the Child Safety Policy, Child Safety Reporting and the Child Safety Code of Conduct on an annual basis and at the time of employment. Sessional staff will be asked to attend specific meetings to receive this training. Staff will sign the Child Safety Code of Conduct document that they have received training in, annually. The Advisory Committee members have had specific training in the legislation with new Committee members being inducted as they commence their term of office. Nazareth Advisory Committee members are also required to sign the Child Safety Code of Conduct annually.

Risk Management

At Nazareth we are committed to proactively and systematically identifying and assessing risks to student safety across our whole school environment, and reducing or eliminating (where possible) all potential sources of harm. We document, implement, monitor and periodically review our risk management strategies for child safety and ensure that the strategies change as needed and as new risks arise. The Leadership Team monitor overall compliance and implementation.

Child safety concerns all members of the school Community. As such, the following sub-committees have responsibility for identifying and managing risks appropriately. These groups are:

- OHS Committee;
- Pastoral Team;
- Administration Team;
- Learning Leaders;
- Leadership Team;
- Business Manager;
- Facilities and Maintenance Team.

Relevant Legislation

1. Children, Youth and Families Act 2005 (Vic.);
 2. Working with Children Act 2005 (Vic.);
 3. Education and Training Reform Act 2006 (Vic.);
 4. Equal Opportunity Act 2010 (Vic.);
 5. Privacy Act 1988 (Cth);
 6. Crimes Act 1958 (Vic.) – (Three new criminal offences has been introduced under this Act).
-
- 1) Failure to disclose offence: Any adult who forms a reasonable belief that a sexual offence has been committed by an adult against a child under 16 has an obligation to report that information to police. Failure to disclose the information to police is a criminal offence (see Betrayal of Trust: Fact Sheet ' Failure to disclose – Appendix 5).
 - 2) Failure to protect offence: The offence will apply where there is a substantial risk that a child under the age of 16 under the care, supervision or authority of a relevant organisation will become a victim of a sexual offence committed by an adult associated with that organisation. A person in a position of authority in the organisation will commit the offence if they know of the risk of abuse and have the power or responsibility to



reduce or remove the risk, but negligently fail to do so (see Failure to Protect Betrayal of Trust: Fact Sheet – Appendix 6) .

- 3) Grooming offence: This offence targets predatory conduct designed to facilitate later sexual activity with a child. Grooming can be conducted in person or online, for example via interaction through social media, web forums and emails (see Betrayal of Trust: Fact Sheet 'Grooming' – Appendix 7)

Related Policies

Catholic Education Melbourne Policies

1. Policy 2.19: Child Protection – Reporting Obligations;
2. Policy 2.19a: School Guidelines – Police and DHHS Interview Protocols;
3. Policy 2.20: Complaints Policy;
4. Policy 2.26: Pastoral Care of Students in Catholic Schools;
5. CEM Guidelines for Behaviour Support;
6. CECV Whole School Approaches to Supporting Positive Behaviour.

School Policies

To create and maintain a safe and nurturing culture, Nazareth will actively and continually develop and review all policies, processes and practices, informed by emerging thinking and evidence. This policy is not to be considered a standalone policy. It is to be implemented with:

1. Child Safety Code of Conduct;
2. Pastoral Care Policy;
3. Anti Bullying policy;
4. College's OH&S procedures;
5. Complaints Policy;
6. Duty of Care Policy;
7. Staff Screening & Recruitment;
8. Staff Induction.

This policy will also work in conjunction with current referring procedures for student support from the Learning Enhancement Team, the School Counsellor and the First Aid Officer.

Breach of Policy

Where an **employee** is suspected of breaching any obligation, duty or responsibility within this policy, Nazareth may start the process under clause 13 of the *Victorian Catholic Education Multi Enterprise Agreement 2018* (VCEMEA) for managing employment concerns. This may result in disciplinary consequences. Where the Principal is suspected of breaching any obligation, duty or responsibility within this policy, the concerned party is advised to contact the Canonical Administrator or the employer. Relevant notification should also be made to Catholic Education Melbourne (Office of Professional Conduct, Ethics and Investigation).

Where any **other member of the school Community** is suspected of breaching any obligation, duty or responsibility within this policy, the school is to take appropriate action, including in accordance with: Child Protection Reporting Obligations Policy and/or contact Senior Officer, Professional Conduct, Ethics & Investigation, Catholic Education Melbourne Ph: 9267 0221 or email: opcei@cem.edu.au.



Review of this child safety policy

At Nazareth College we are committed to continuous improvement of our child safety systems and practices. We intend this policy to be a dynamic document that will be regularly reviewed to ensure it is working in practice and updated to accommodate changes in legislation or circumstance. We will maintain a history of updates to the policy.

History of updates to policy

2017, 2018, 2019 Minor – Updates provided by CEM

REFERENCES

Catholic Education Commission of Victoria Ltd (CECV) 2018, Victorian Catholic Education Multi Enterprise Agreement 2018, CECV.

Congregation for Catholic Education 1997, The Catholic School on the Threshold of the Third Millennium, Vatican,

Department of Education, 2016, PROTECT: Identifying and responding to all forms of abuse in Victorian schools

State of Victoria 2016, Child Safe Standards – Managing the Risk of Child Abuse in Schools: Ministerial Order No. 870, Education & Training Reform Act 2006, Victorian Government Gazette No. S2. Parliament of Victoria, Family and Community Development Committee, 2013, Betrayal of Trust

Section Two

CHILD PROTECTION REPORTING OBLIGATIONS



INTRODUCTION

Protection for children and young people is based upon the belief that each person is made in the image and likeness of God and that the inherent dignity of all should be recognised and fostered.

Catholic schools are entrusted with the holistic education of the child in partnership with parents, guardians and caregivers, who are the primary educators of their children. Catholic school staff therefore have a duty of care to students by taking reasonable care to avoid acts or omissions which they can reasonably foresee would be likely to result in harm or injury to the student and to work for the positive wellbeing of the child

Under the National Framework for Protecting Australia's Children 2009–2020, protecting children is everyone's responsibility – parents, communities, governments and business all have a role to play. In Victoria, a joint protocol, protecting the safety and wellbeing of children and young people, involving the Department of Health and Human Services (DHHS) Child Protection, the Department of Education and Training (DET), the Catholic Education Commission of Victoria (CECV) and licensed children's services, exists to protect the safety and wellbeing of children and young people. DET has also produced Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse and Responding to Suspected Child Abuse: A Template for all Victorian Schools, both of which are referred to in the joint protocol (Appendix One).

All teachers, staff, Parish Priests, Canonical and religious order administrators of Catholic schools within Victoria must understand and abide by the professional, moral and legal obligations to implement child protection and child safety policies, protocols and practices.

PURPOSE OF THIS POLICY

Schools must comply with the legal obligations that relate to managing the risk of child abuse under the Children, Youth and Families Act 2005 (Vic.), the Crimes Act 1958 (Vic.) and the recommendations of the Betrayal of Trust Report.

The Child Wellbeing and Safety Act 2005 (Vic.) introduced the seven Victorian Child Safe Standards which aim to create a culture where protecting children from abuse is part of everyday thinking and practice. The Child Safe Standards were introduced in response to recommendations made by the Betrayal of Trust report. Ministerial Order No. 870 – Managing the Risk of Child Abuse in Schools was made under the Education and Training Reform Act 2006 (Vic.) and sets out the specific actions that all Victorian schools must take to meet the requirements in the Child Safety Standards.

This policy is designed to assist staff (which includes volunteers, contractors, other service providers and religious leaders, including clergy) to:

- Identify the indicators of a child or young person who may be in need of protection;
- Understand how a 'reasonable belief' is formed;
- Make a report of a child or young person who may be in need of protection;
- Comply with mandatory reporting obligations under child protection law and their legal obligations relating to criminal child abuse and grooming under criminal law.

Child Protection reporting obligations fall under separate pieces of legislation with differing reporting requirements. This policy sets out the actions required under the relevant legislation when there is a reasonable belief that a child is in need of protection or a criminal



offence has been committed and provides guidance and procedures on how to make a report. The legislation Child Protection falls under is:

1. Children, Youth and Families Act 2005 (Vic.);
2. Education and Training Reform Act 2006 (Vic);
3. Crimes Act 1958 (Vic).

These legislative obligations exist in addition to moral duty of care obligations, which require school Community members to protect any child under their care and supervision from foreseeable harm.

This policy sets out the actions required under the relevant legislation and regulatory guidance when there is a reasonable belief that a child needs protection or a criminal offence has been committed. It also provides guidance and procedures on how to make a report.

All procedures for reporting and responding to an incident of child abuse are designed and implemented by taking into account the diverse characteristics of school communities.

TYPES OF CHILD ABUSE AND INDICATORS OF HARM

Child abuse can take many forms. The perpetrator may be a parent, carer, school staff member, volunteer, another adult or even another child. The nature of child abuse is complex. The abuse may occur over time and potential risk indicators are often difficult to detect. Therefore, the legal obligations for reporting allegations of child abuse can vary depending on the circumstances of the incident.

Child abuse is defined in the Child Wellbeing and Safety Act 2005 (Vic) to include:

- Sexual offences;
- Grooming;
- Physical violence;
- Serious emotional or psychological harm;
- Serious neglect.

Family violence is defined under the Family Violence Protection Act 2008 (Vic) to include behaviour that causes a child to hear, witness, or be exposed to the effects of family violence such as abusive, threatening, controlling or coercive behaviour. While family violence does not form part of the official definition of 'child abuse' in the Child Wellbeing and Safety Act, the impact of family violence on a child can be a form of child abuse - for example, where it causes serious emotional or psychological harm to a child.

Child abuse can have a significant effect on a child's physical or emotional health, development and wellbeing. The younger a child the more vulnerable he/she is and the more serious the consequences are likely to be.

There are many indicators of child abuse and neglect. The presence of a single indicator, or even several indicators, does not prove that abuse or neglect has occurred. However, the repeated occurrence of an indicator, or the occurrence of several indicators together, should alert staff to the possibility of child abuse and neglect. While any indicators of possible child abuse or neglect are concerning, it is important to know which indicators must be reported.



It is mandatory to report concerns relating to:

- Physical abuse;
- Sexual abuse.

While not mandated, making a report to DHHS Child Protection may also be needed for:

- Emotional abuse;
- Neglect;
- Medical neglect;
- Family violence;
- Human trafficking (including forced marriage);
- Sexual exploitation (including pornography and prostitution);
- Risk taking behaviour;
- Female genital mutilation;
- Risk to an unborn child;
- A child or young person exhibiting sexually abusive behaviours.

Child sexual abuse is more commonly perpetrated by someone who is known to, and trusted by the child and is also often someone highly trusted within their families, communities, schools and/or other institutions, such as the Church.

For full definitions for all of the types of child abuse and a comprehensive list of the indicators of harm and advice on identifying perpetrators of sexual abuse refer to the protocol Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools

SOURCES OF CHILD PROTECTION REPORTING OBLIGATIONS

- 1) Children, Youth and Families Act 2005 (Vic.)

Mandatory Reporting

Mandatory reporting is a legal requirement under the Children, Youth and Families Act 2005 (Vic.) (Act) to protect children from harm relating to physical injury and sexual abuse. A child, for the purpose of the relevant parts of the Act, is any person 17 years of age or younger. School personnel mandated under this Act who, in the course of carrying out their duties, form a reasonable belief that a child is in need of protection from physical, emotional, psychological, developmental harm or sexual abuse, and that the child's parents are unwilling or unable to protect the child, must report that belief to DHHS Child Protection and the grounds for it as soon as possible after forming the belief. A subsequent report must be made on each occasion on which the mandated reporter becomes aware of further reasonable grounds for the belief.

Reasonable Belief

When staff are concerned about the safety and wellbeing of a child or young person, they must assess that concern to determine if a report should be made to the relevant agency. This process of considering all relevant information and observations is known as forming a 'reasonable belief'.



A 'reasonable belief' or a 'belief on reasonable grounds' is not the same as having proof but is more than mere rumour or speculation. **A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds.**

A 'reasonable belief' might be formed if:

- A child states that they have been physically or sexually abused;
- Any person tells you that they believe someone has been abused, this may include a child who is talking about themselves;
- You observe physical or behavioural indicators of abuse, as described in 'Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools.';
- A child or young person exhibits sexually abusive or age inappropriate behaviour(s);
- Professional observations of the child's behaviour or development cause you to form a belief that the child has been physically or sexually abused or is likely to be abused.

While any indicators of possible child abuse or neglect are concerning, it is important to understand that the presence of a number of indicators that suggest either physical or sexual abuse of a child may be sufficient to form a 'reasonable belief' in a mandated report's mind which must be reported.

2) Crimes Act 1958 (Vic.)

In response to the Betrayal of Trust report three new criminal offences have been introduced under the Crimes Act 1958 (Vic.):

1. Failure to disclose offence, which requires adults to report to police a reasonable belief that a sexual offence has been committed against a child;
2. Failure to protect offence, which applies to people within organisations who knew of a risk of child sexual abuse by someone in the organisation and had the authority to reduce or remove the risk, but failed to do so;
3. Grooming offence, which targets communication with a child or their parents with the intent of committing child sexual abuse.

Failure to disclose

Any staff member who forms a reasonable belief that a sexual offence has been committed in Victoria by an adult against a child under 16 must disclose that information to police.

Failure to disclose the information to police is a criminal offence under section 327 of the Crimes Act 1958 (Victoria) and applies to all adults [18 years and over] in Victoria, not just professionals who work with children. Refer to Appendix 2 for more information on when to report a concern that a child or young person has been sexually abused, or is in need of protection from sexual abuse.

The obligation is to disclose that information to the police as soon as it is practicable to do so, except in limited circumstances such as where the information has already been reported to DHHS Child Protection.

For further information about the 'failure to disclose' offence, see - Department of Justice and Regulations – Failure to disclose offence and the Betrayal of Trust: Fact Sheet included as an attachment to the Nazareth College Child Safety and Protection Policy – Section One.



Failure to protect

Any staff member in a position of authority who becomes aware that an adult associated with their organisation (such as an employee, contractor, volunteer, sport coach or visitor) poses a risk of sexual abuse to a child under 16 who is in the care or supervision of the organisation must take all reasonable steps to reduce or remove that risk.

Failure to take reasonable steps to protect a child in the organisation from the risk of sexual abuse from an adult associated with the organisation is a criminal offence contained in section 49C (2) of the Crimes Act 1958 (Vic.).

For further information about the 'failure to protect' offence, see - Department of Justice and Regulations - Failure to protect offence and the Betrayal of Trust: Fact Sheet 9 included as an attachment to the Nazareth College Child Safety and Protection Policy).

Grooming

The offence of grooming prohibits predatory conduct designed to prepare or 'groom' a child for future sexual activity and is contained in section 49B (2) of the Crimes Act 1958 (Vic.). The offence applies to communication with children under 16 years.

Grooming can be conducted in person or online, for example via interaction through social media, web forums and emails. The offence can be committed by any person aged 18 years or over. It does not apply to communication between people who are both under 18 years of age.

For further information about the 'grooming offence', see - Department of Justice and Regulation – Grooming offence and the Betrayal of Trust: Fact Sheet (included as an attachment to the Nazareth College Child Safety Policy).

3) Education and Training Reform Act 2006 (Vic.)

From a child safety perspective, the key functions of the Education and Training Reform Act 2006 (Vic.) are to:

- Require schools to notify the Victorian Institute of Teaching (VIT) when a school has taken action against a teacher;
- Make compliance with the Victorian Child Safe Standards a requirement for registration of all Victorian schools.

Duty of Care

School staff have a duty to take reasonable steps to protect children and young persons under their care and supervision from harm that is reasonably foreseeable (this duty applies to all school staff). The question of what constitutes reasonable steps will depend on the individual circumstances of each case. A staff member may breach their duty of care towards a student if they fail to act in the way a reasonable or diligent professional would have acted in the same situation.

For more information on the scope of staff duty of care obligations and examples of reasonable steps they can take in relation to suspected child abuse, refer to the protocol Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools.



Procedures

Nazareth College has a moral, legal and mission driven responsibility to create nurturing school environments where children and young people are respected, their voices heard and where they are safe and feel safe.

Every person involved in Nazareth College has a responsibility to understand the important and specific role they have individually and collectively to ensure that the wellbeing and safety of all children and young people is at the forefront of all they do and every decision they make.

It is Catholic Education Melbourne's policy that all schools display the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse diagram in staff rooms and other strategic areas of the school, to ensure all school staff are aware of the actions to take as soon as they witness a child protection incident, receive a disclosure or form a reasonable belief that a child has been, or is at risk of being, abused

Responding to and Reporting Child Protection Concerns

The approach to responding and reporting child protection concerns in the joint protocol incorporates the Four Critical Actions for Schools. Refer: Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse.

Before the Four Critical Actions can be followed a school, staff member must first be made aware of a child protection incident that will determine if they must take action to protect a child.

Becoming aware of a child protection incident

There are four main ways in which a school staff member may become aware that a child is experiencing, or is at risk of experiencing, abuse:

1. **Witnessing an incident** - If you witness an incident where you believe a child has been subjected to abuse you must first take immediate action to protect the safety of the child or children involved and then go straight to the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse (Appendix 1).
2. **Forming a suspicion** - All suspicions that a child has been, is being, or is at risk of being abused must be taken seriously, including suspicions that the abuse is taking, or may take place outside school grounds or areas. If your suspicion develops into a reasonable belief you must act and refer to the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse (Appendix 1).
3. **Receiving a disclosure about or from a current student** - All disclosures must be treated seriously. You should immediately refer to the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse (Appendix 1).
4. **Receiving a disclosure about or from a former student** - If the former student is currently of school age and attending a Victorian school, you must immediately refer to the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse (Appendix 1). If the former student is no longer of school age or attending a Victorian school, you must still report the disclosure to DHHS Child Protection.



Notes and Records

Staff members are to keep clear and comprehensive notes relating to incidents, disclosures and allegations of child abuse using the Responding to Suspected Child Abuse: A Template for all Victorian Schools.

For strategies on how to manage a disclosure refer to Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools – Sec One, (Appendix 3).

The Four Critical Actions

There are Four Critical Actions which must be taken when responding to and reporting a child protection incident, disclosure or suspicion:

1. Responding to an Emergency;
2. Reporting to Authorities;
3. Contacting Parents/Carers;
4. Providing Ongoing Support.

Critical Action 1 - Responding to an Emergency

This first step is only applicable if a child has just been abused or is at immediate risk of harm. If this is not the case, go straight to Critical Action 2: Reporting to authorities. If the child has just been abused or is at immediate risk of harm you must take reasonable steps to protect the child, including:

- Separating the alleged victim and others involved, ensuring that if the parties involved are all present at the school, that they are supervised separately by a member of staff;
- Arranging and providing urgent medical assistance where necessary, including administering first aid or calling 000 for an ambulance;
- Calling 000 for urgent police assistance if the person who is alleged to have engaged in the abuse poses an immediate risk to the health and safety of any person;
- If the child protection incident has occurred at the school, school staff should also ensure that reasonable steps are taken to preserve the environment, the clothing and other items and prevent any potential witnesses from discussing the incident until the police or relevant authorities arrive on the premises.

Critical Action 2 - Reporting to Authorities

All forms and instances of suspected or alleged child abuse must be reported to the appropriate authority. As soon as critical health and safety concerns have been addressed the staff member must take steps to report the child protection incident, suspicion or disclosure as soon as practicable.

DHHS Child Protection is the Victorian government agency that protects children at risk of significant harm. All incidents, suspicions and disclosures of child abuse must be reported to DHHS Child Protection except where the incident involves sexual abuse or grooming, in which case it must be reported to the Police. Failure to report physical or sexual abuse of a child is a criminal offence. For more information, refer to the Failure to disclose section of this policy.

There are different reporting procedures and authorities who must be notified depending on whether the source of the suspected or alleged abuse came from within the school or within the family or community of the child. The DHHS and DET have deliberately set a low threshold for the formation of a 'reasonable belief'.

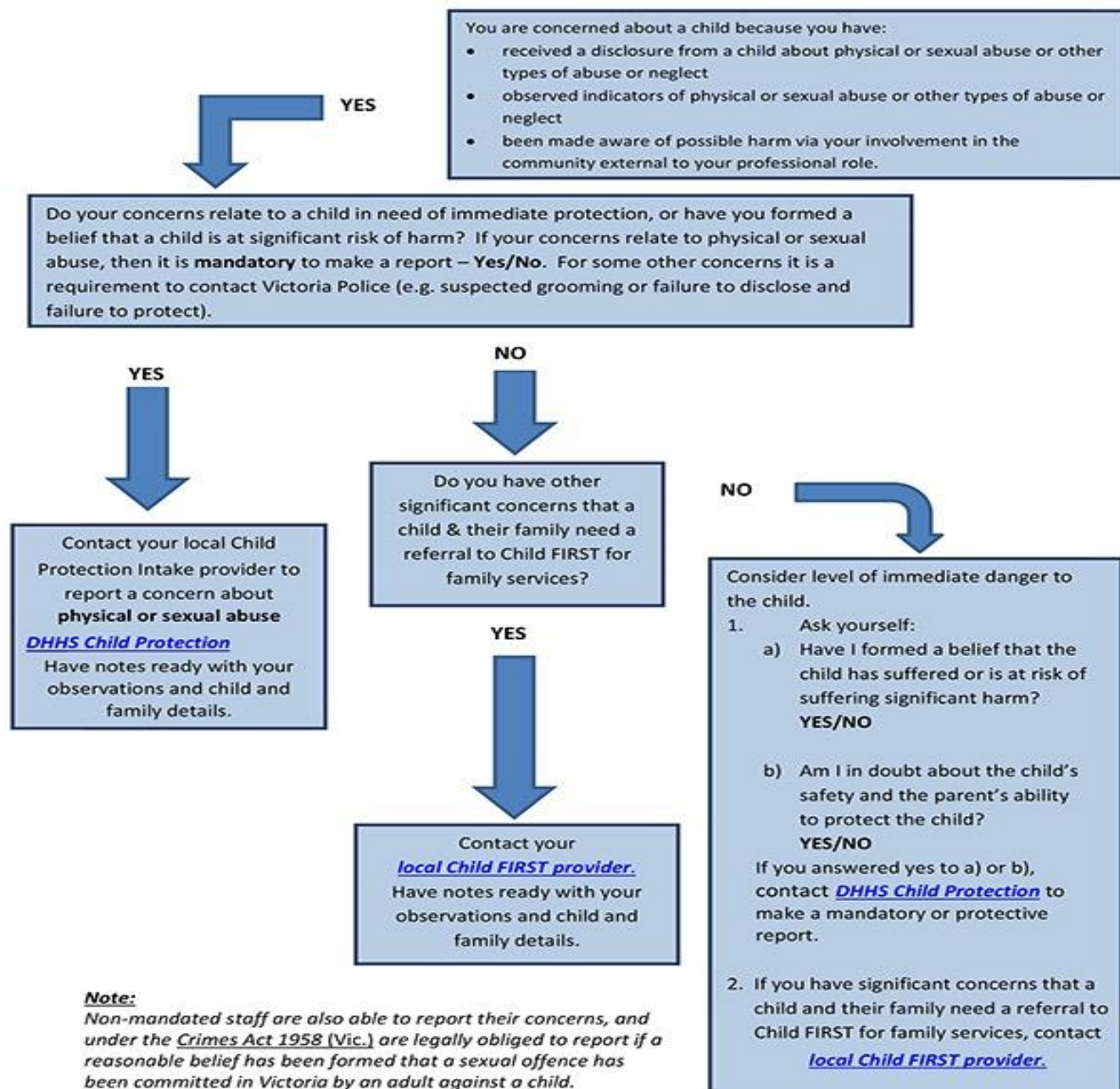


The Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse requires all school staff to report all incidents, suspicions and disclosures of abuse as soon as possible to the relevant authorities.

How to Make a Mandatory Report

The table 1.1 'When to make a mandatory report' describes the information to include when making a mandatory report about child abuse or child protection concerns. If a child is at immediate risk of harm, contact the Police immediately. The following tables set out when to report a concern that a child or a young person has been abused, or is in need of protection.

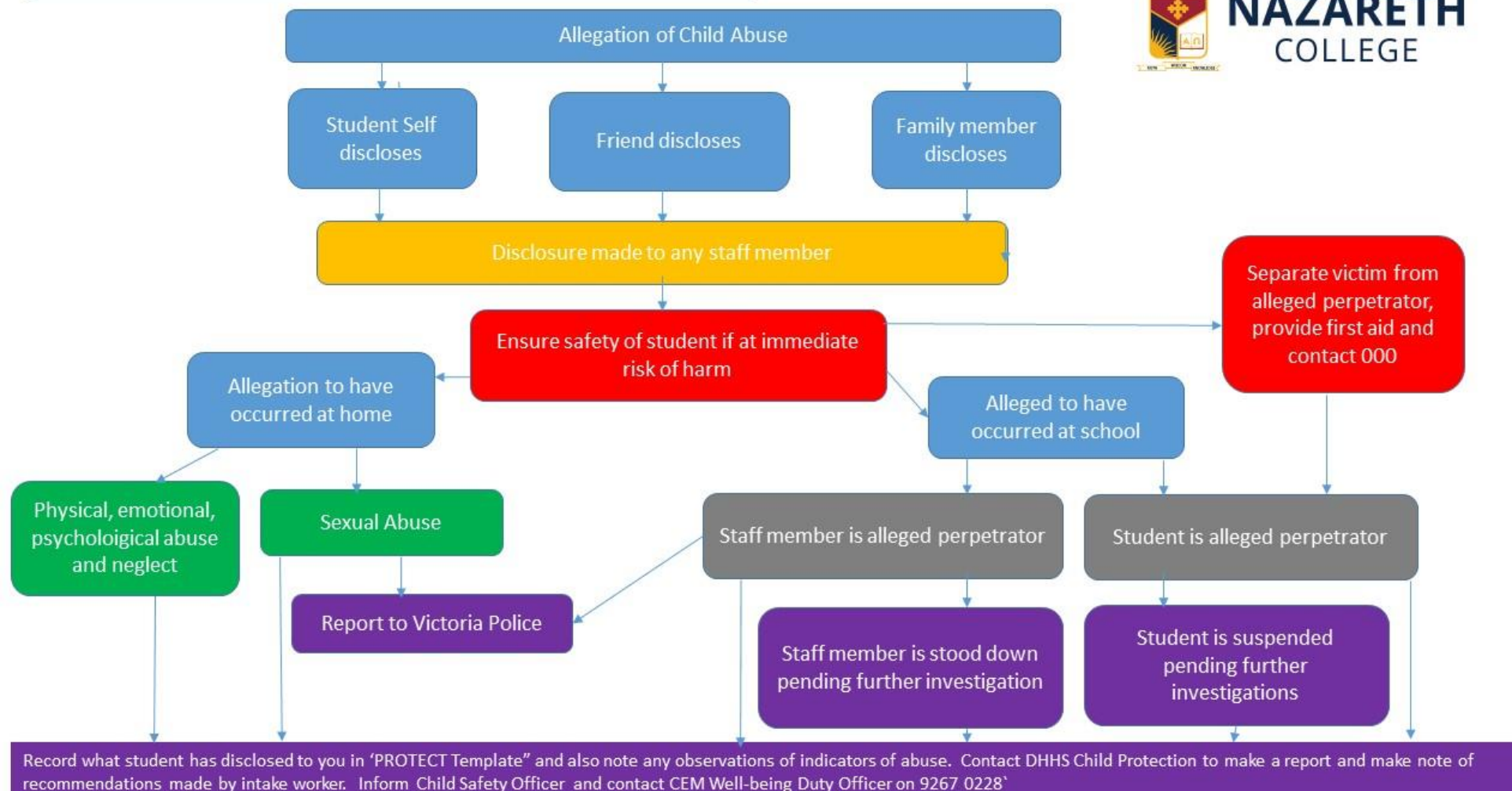
1.1 Flowchart – Responding to a possible mandatory reporting concern



Flow chart of responding to Allegation of child abuse



NAZARETH
COLLEGE





1.1 When to make a mandatory report

Type of Reporting	By Whom	To Whom
<p>Mandatory Reporting DHHS Child Protection Mandated reporters must make a report as soon as practicable if, in the course of practicing their profession or carrying out their duties, they form a belief on reasonable grounds that a child or young person is in need of protection, as a result of physical injury or sexual abuse, and the child's parents are unable or unwilling to protect the child.</p> <p>Physical injury that results from abuse or neglect. This refers to a situation in which a child receives an injury from a parent or caregiver which may be inflicted intentionally or be the inadvertent consequence of physical punishment or physically aggressive treatment of a child. Physical injury may also result from neglect from a parent or caregiver.</p> <p>Sexual abuse which occurs when an adult or someone bigger and/or older than the child uses power or authority to involve the child in sexual activity. Physical force is sometimes involved.</p>	<p>Mandated reporters Teachers registered to teach or who have permission to teach pursuant to the Education and Training Reform Act 2006 (Vic.), Principals of government and non-government schools, Registered medical practitioners, Nurses, psychologists, All members of the police force.</p>	<p>Contact DHHS Child Protection</p>



1.2 When a report may be required, though not mandated

<p>Child in need of protection Any person may make a report if they believe on reasonable grounds that a child is in need of protection for any of the following reasons:</p> <ul style="list-style-type: none"> • The child has been abandoned and there is no other suitable person who is willing and able to care for the child. • The child's parents are dead or incapacitated and there is no other suitable person who is willing and able to care for the child. • The child has suffered or is likely to suffer significant harm as a result of physical injury and the parents are unable or unwilling to protect the child. • The child has suffered or is likely to suffer significant harm as a result of sexual abuse and their parents are unable or unwilling to protect the child. • The child has suffered or is likely to suffer emotional or psychological harm and the parents are unable or unwilling to protect the child. • The child's physical development or health has been, or is likely to be significantly harmed and the parents are unable or unwilling to provide basic care, or effective medical or other remedial care. 	Any person	<p><i>Contact DHHS Child Protection</i></p> <p>and</p> <p>Victoria Police if it is clear a crime has been committed.</p>
<p>Child in need of therapeutic treatment Any person may make a report if they believe on reasonable grounds that a child who is 10 years of age or over, but under 15 years of age, is in need of therapeutic treatment because he or she has exhibited sexually-abusive behaviours. Contact Child FIRST if there is no significant concern about the immediate safety of the child.</p>	Any person	<p>Contact DHHS Child Protection or Child FIRST</p>
<p>Significant concerns about wellbeing of a child School staff can seek advice from or make referral to DHHS Child Protection or Child FIRST if they have a significant concern for the wellbeing of a child and where the immediate safety of the child is not compromised. The staff member should share relevant information with Child FIRST to help them complete their assessment of the referral.</p>	Any person	<p>Contact DHHS Child Protection or Child FIRST</p>



1.3 When to report criminal offences

Types of Reporting	By Whom	To Whom
<p>Reasonable belief that a sexual offence has been committed by an adult against a child under 16.</p> <p>Any adult who forms a reasonable belief that a sexual offence has been committed in Victoria by an adult against a child under 16 must report that information to police.</p> <p>You will not be guilty of an offence if you do not report in the following circumstances:</p> <ul style="list-style-type: none"> The victim is 16 years of age or older and does not have an intellectual disability that limits his/her capacity to make an informed decision; and he/she does not want the information reported to the police; The victim has disclosed the information in confidence in the course of a therapeutic relationship with you as a registered medical practitioner or counsellor; The victim turned 16 years of age before 27 October 2014; Reasonable excuses for failing to comply with the requirement include: <ol style="list-style-type: none"> a reasonable belief that the information has already been reported to police or DHHS Child Protection disclosing all of the information; a reasonable fear that the disclosure will place someone (other than the alleged perpetrator) at risk of harm. 	Any person aged 18 or over	Victoria Police

2. How to make a report for mandatory reporting and criminal offences

Making a report

In case of emergency or if a child is in life-threatening danger contact Triple Zero (000) or the local police station. Alternatively, to report concerns about the immediate safety of a child within their family unit to DHHS Child Protection, call the local Child Protection (see Appendix 4). If after hours call the Child Protection Crisis Line on 13 12 78.

The table below describes the procedures for Nazareth College staff when making a mandatory report about child abuse or child protection concerns. The following information also provides practical guidance in relation to record-keeping for both mandatory reporting and criminal offences.

Table 1.4 Making a Mandatory report

Step	Description
1 Keep Notes	Individual staff members will make any observations and keep dated notes of the concerns that exist that have led them to form the belief that a report may be necessary. It may assist staff to think in terms of reporting behaviour or a series of behaviours and concerns. Notes should include:



	<ul style="list-style-type: none"> • A description of the concerns (e.g., physical injuries, behaviours); • The source of the concerns (e.g., observation, report from child or another parent; • The actions taken as a result of the concerns (e.g., consultation with the principal, Child Safety Officers, report to DHHS, Police.
2. Discuss Concerns	<p>Due to the complexity of child abuse incidents, disclosures and suspicions, it is recommended that concerns and observations regarding suspected physical or sexual abuse of a child are discussed confidentially with the principal, the child safety officers or Catholic Education Melbourne's Student Wellbeing Information Line. Those people in the positions of child safety officers at Nazareth College are: the, Assistant Principal, directors of wellbeing and School Counsellor.</p> <p>This is not a legal requirement, however will help to ensure support is provided to all involved in matters of this nature. The confidentiality of these discussions must be maintained.</p> <p>You should then make your own assessment about whether you are required to make a report about the child or young person and to whom the report should be made.</p> <p>It is important to remember that the duty to report abuse or suspicions of abuse exists even if the principal, child safety officer or a representative of Catholic Education Melbourne advise you not to proceed with reporting suspected abuse.</p>
3. Gather & Document Information	<p>Gather the relevant information necessary to make the report. This should include the following information:</p> <ul style="list-style-type: none"> • Full name, date of birth and residential address of the child; • The descriptions of the concerns and the reasons for those concerns • The source of those concerns – eg observation, report from the child or another person); • The individual staff members' involvement with the child; • Details of any other agencies which may be involved with the child; • Actions taken as a result of the concerns (eg consultation with Assistant Principal, report to DHHS). <p>This information should be collected and documented using the Responding to Suspected Child Abuse: A Template for all Victorian Schools. The template is to be used to record as much information as possible when you make your report to either the Police or DHHS Child Protection. It is critical that completing the template does not impact on reporting times. If a child is in immediate danger school staff need to report the matter immediately to the Police.</p>
4. Make the report	<p>To report concerns which are life threatening phone 000 or the local police station.</p> <p>Where the source of the abuse comes from within the school; that is, the suspected or alleged abuse involves a staff member, volunteer or contractor at the school: Contact the Police. The Police will in this case, contact DHHS Child Protection when appropriate. You must also report internally to:</p>



	<ul style="list-style-type: none"> • The Principal, (if the Principal is involved in the allegations, contact CEM); • The Child Safety Officers; • Catholic Education Melbourne's Student Wellbeing Information Line (9267 0228). <p>Where the source of the suspected or alleged abuse comes from within the child's family or community, you must:</p> <ul style="list-style-type: none"> • report sexual abuse and grooming to the Police; • Report the matter to DHHS Child Protection if you consider the child to be in need of protection due to child abuse, or has been, is being or is at risk of being harmed due to any form of abuse. If after hours call the Child Protection Crisis Line on 13 12 78; • Report internally to: the Principal, Child Safety Officers and the Catholic Education Melbourne's Student Wellbeing Information Line (9267 0228). <p>Any staff member who makes a report to DHHS and/or Victoria Police will be supported by a member of the College Leadership or a Child Safety Officer.</p> <p>Finally gather the relevant information necessary to make the report. This should include the following information:</p> <ul style="list-style-type: none"> • The child's name, date of birth, age and address; • The reason for believing that the injury or behaviour is the result of abuse; • The assessment of immediate danger to the child or children (information may be requested about the whereabouts of the alleged abuser/s); • A description of the injury or behaviour observed; • The current whereabouts of the child; • Any other information about the family; • the individual staff member's involvement with the child or young person; • details of any other agencies which may be involved with the child or young person; • Relationship with the child of the person reporting. <p>As mandated reporters, you still must notify DHHS of the concerns even if all of the above information is not available. Failure to do this when you have reasonable grounds on which to form a belief is an offence and can incur a fine.</p>
<p>5. Document written records of report</p>	<p>Make a written record of the report including the following information:</p> <p>The information initially recorded in the Responding to Suspected Child Abuse: A Template for all Victorian Schools and any additional information provided to either the Police or DHHS Child Protection is to be stored securely and maintained for a minimum of seven (7) years by the school, to ensure that records are accessible upon request by external authorities investigating the matter.</p> <p>It should be decided who else in the school, if anyone, should be informed. The need for confidentiality should be remembered at all times in the interests of the student and the family. Only where the wellbeing of the student will be affected will</p>



	the matter be discussed on a 'need to know' basis. All correspondence will come directly from the Assistant Principal
6. Additional Steps	<p>In the case of International students, the Assistant Principal must notify the International Education Division of the Department of Education and Training on (03) 9637 2990 to ensure that appropriate support is arranged for the student.</p> <p>Additionally, where a child protection incident, disclosure or suspicion involves an international student at the school and the school has issued a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter for that student (thereby assuming responsibility for the child's accommodation, support and general welfare) the school will also need to contact the VRQA.</p> <p>In the case of Aboriginal or Torres Strait Islander students, the Assistant Principal must notify the CEM or Regional Office to ensure that the Aboriginal and Torres Strait Islander Education Team arrange appropriate support for the student.</p>
7. Notes	<ul style="list-style-type: none"> • The Child Safety Officers will support the reporting staff members and student that is the cause for concern. Appropriate support may consist of internal and external support structures. • All Nazareth College staff will be required to annually complete the 'Protecting the Safety of Children and Young People' mandatory reporting Professional Learning module (for Catholic/Independent Schools). It is the responsibility of the Principal to ensure that there is appropriate time allocated to complete this module http://www.elearn.com.au/deecd/mandatoryreporting/ • Additionally, staff will receive a Child Protection Briefing every year.

ChildFIRST/Orange Door

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/Orange Door.

ChildFIRST/Orange Door is the Family Information Referral Support Team run by a registered community service in a local area that can receive confidential referrals about a child of concern. It does not have any statutory powers to protect a child but can refer matters to family services.

You should make a report to ChildFIRST/Orange Door if:

- You have a significant concern for a child's wellbeing;
- Your concerns are about circumstances that have a low-to-moderate impact on the child;
- The child's immediate safety is not compromised;
- You and the school have discussed the referral to child first/orange door with the child's parents/carers, and all parties are supportive of this decision.



Where you believe that the child's parents/carers will not be supportive of the referral, you may refer the matter to DHHS Child Protection.

If you are unsure of what action to take in response to your concerns about a child, speak to the College's Child Safety Officers or a member of the school's Leadership Team, or contact DHHS Child Protection or ChildFIRST/Orange Door for further advice (Appendix 5). For additional information refer to Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools.

Making Additional Reports

After you have made a report, you may continue to suspect that a child is at risk and in need of protection. Any further observations should continue to be recorded and a report made on each separate occasion where a belief has been formed – on reasonable grounds – that a child is likely to be at risk and in need of protection.

If there is any suspicion that this relates to a sexual offence involving a person over 18 and a child under 16 then it must be reported to the Police.

Where a staff member is aware that another staff member has formed a reasonable belief about the same child on the same occasion, or based on the same indicators of abuse, and has made a report to the appropriate authority, the first staff member need not make a further report. However, if the first staff member has formed a reasonable belief of abuse or a significant risk of abuse to the child based on different observations, further indicators or additional information, a further report must be made to the appropriate authority detailing this additional information

Critical Action 3 - Contacting Parents/Carers

Where it is suspected that a child at the school has been, or is at risk of being abused, it is critical that parents/carers of the child are notified as soon as practicable after a report is made to the authorities. However, the school must always seek advice from the Police/DHHS Child Protection, to ensure that it is appropriate to contact the parents/carers:

- Advice from the Police or DHHS Child Protection will depend on a number of factors, including - whether the parents/carers of the child are alleged to have engaged in the abuse;
- Whether a disclosure to the parents/carers may result in further abuse to the child;
- Where the child is a mature minor (at least 17 years of age and assessed to be sufficiently mature and intelligent to make decisions for themselves) and has requested that their parents/carers not be notified – the school should insist that another responsible adult is notified in lieu of the parents/carers;
- Whether notifying parents/carers would adversely affect an investigation of the matter by external authorities.

Where the suspicion of abuse or risk of abuse has not yet warranted a reasonable belief, parents/carers should also be notified promptly after the school has carefully considered the factors listed above. For detailed guidance on how to have this conversation with a parent or carer, refer to Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools.



Critical Action 4 - Providing Ongoing Support

Staff members who witness a child protection incident, receive a disclosure or develop a suspicion of child abuse have a critical role to play in supporting students impacted by the child protection matter, to ensure that they feel supported and safe at the school.

Support provided to students at the school includes:

- Regular communication with the student and their parents/carers where appropriate;
- Convening a student support group of school wellbeing staff and teachers to plan, support and monitor affected students;
- The development of student support plans for students impacted by the incident to ensure appropriate levels of care and support are provided depending on their involvement;
- The school will also contact the Catholic Education Melbourne's Student Wellbeing Information Line (9267 0228) for a description of the range of school based support services that may be available.

Where external authorities are investigating a report of abuse or risk of abuse, it is the role of the Principal to ensure that students are supported throughout interviews at the school. For more information on this topic, refer to School Guidelines 2.19a: Police and DHHS Interview Protocols - (Appendix 6).

The school has a duty to ensure that school staff members are supported following the witnessing of an incident or disclosure, or who have made a report to external authorities about a reasonable belief of child abuse. Staff members requiring wellbeing support can contact the school's Employee Assistance Program (EAP) provider on 1800 818 728 or accesseap.com.au. The school will conduct a review of the reporting process 4–6 weeks after a report has been made to identify if any follow-up support actions are needed.

This table describes the potential consequences of making a report.

3.2 Potential consequences of making a report

Potential consequence	Description
Confidentiality	The identity of a reporter must remain confidential unless: <ul style="list-style-type: none">• The reporter chooses to inform the child, young person or parent of the report;• The reporter consents in writing to their identity being disclosed;• A court or tribunal decides that it necessary for the identity of the reporter to be disclosed to ensure the safety and wellbeing of the child;• A court or tribunal decides that, in the interests of justice, the reporter is required to provide evidence.
Professional Protection	If a report is made in good faith: <ul style="list-style-type: none">• It does not constitute unprofessional conduct or a breach of professional ethics on the part of the reporter;• The reporter cannot be held legally liable in respect of the report.



Interviews	<p>DHHS Child Protection and/or Victoria Police may conduct interviews of children and young people at the school without their parent's knowledge or consent:</p> <ul style="list-style-type: none"> • Interviewing children and young people at school should only occur in exceptional circumstances and if it is in the best interests of the child to proceed in this manner; • DHHS Child Protection and/or Victoria Police will notify the Principal or a member of the Leadership Team of their intention to interview the child or young person on the school premises; • When DHHS Child Protection/Victoria Police officers come to the school premises, the Principal or a member of the Leadership Team should request to see identification before permitting them to have access to the child or young person; • When a child or young person is being interviewed by DHHS Child Protection and/or Victoria Police, school staff must arrange to have a supportive adult present with the child or young person. <p>For more information on these requests and school responsibilities, see Catholic Education Melbourne's School Guidelines 2.19a: Police and DHHS Interview Protocols.</p>
Support for the child or young person	<p>The roles and responsibilities of staff members in supporting children who are involved with DHHS Child Protection may include the following:</p> <ul style="list-style-type: none"> • Acting as a support person for the child or young person attending DHHS Child Protection case planning meetings; • Observing and monitoring the child's behaviour liaising with professionals; • Observing and monitoring the child's behavior; • Liaising with professionals.
Requests for Information	<p>DHHS Child Protection and/or Child FIRST and/or Victoria Police may request information about the child or family for the purpose of investigating a report and assessing the risk to the child or young person.</p> <p>In certain circumstances, DHHS Child Protection can also direct school staff and Department staff to provide information or documents about the protection or development of the child. Such directions should be in writing and only be made by authorised persons within DHHS Child Protection:</p>
Witness Summons	<p>If DHHS Child Protection makes a Protection Application in the Children's Court of Victoria, any party to the application may issue a Witness Summons to produce documents and/or to give evidence in the proceedings.</p>

Responding to complaints or concerns

The school may receive concerns or complaints about school staff management of a child protection incident. These concerns or complaints may be voiced by parents/guardians or others within the school Community. The school should follow its internal complaints



handling process to ensure that all concerns, complaints or feedback on school policies or processes are effectively captured and appropriately managed.

It is important that, as a first step, the school ensures that the complaint does not raise concerns that child abuse or a risk of child abuse has gone unreported.

If this is the case, the school should follow the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse to ensure that any new information received through a complaint or concern from a member of the school community is reported to authorities where required

Guiding Principles

Any current or past student from Nazareth College has the right to make a complaint about any aspect of their school experience. Complainants who raise allegations of a criminal Act will be advised of their right to make a formal complaint to the Police. All complaints will be taken seriously and will be addressed and responded to as soon as possible.

In circumstances in which students at Nazareth College have suffered abuse whilst at the school, the school accepts in full the responsibility to support and assist that person, whether it is a current, or former, student.

When Nazareth College believes that a complaint should be upheld, the response from the school will include some form of reparations.

Reparations may include, but will not be limited to:

- Acknowledgement of any failures in the Nazareth College duty of care;
- Provision of a formal apology in a format and manner agreed with the complainant;
- Assistance with access to counselling or other support services;
- Remedial actions to prevent the reoccurrence of any similar acts of sexual abuse against Nazareth College students;
- A financial payment reparation may only be offered to the claimant, victim or victims with the recommendation of the Principal, together with the Nazareth College Advisory Committee and approval of the Canonical Administrators.

The Child Safety Reporting Policy will:

- Be based on principles of procedural fairness for all parties;
- Treat complainants respectfully, supportively and professionally;
- Be as open and transparent as possible, whilst respecting people's rights to privacy and confidentiality;
- Take a humane view, rather than a legalistic approach;
- Reflect a commitment to address past grievances and provide a pathway towards recovery and healing;
- Endeavour to ensure staff maintain confidentiality and appropriate record keeping;
- Consider the complainant's expressed wishes, gender, culture, language and accessibility, throughout the process;
- Respect the rights of the alleged perpetrator with regard to untested allegations;
- The College will always release its student file to a complainant, subject to 'blinking out'/removing material that would identify others (breach the privacy rights of other persons);



- Use de-identified information where it is possible to do so, in the course of the investigation;
- Where a crime appears to have been committed, the complainant will be encouraged to report it to the Police;
- The school will always act in a way consistent with its legal and ethical obligations;
- The authorities will always be advised, where that is mandated under law, or in circumstances where the school views that as appropriate to prevent further harm (eg where the perpetrator is still teaching at the school or elsewhere). To this extent, the school may not be able to provide an undertaking as to confidentiality to either the complainant or the alleged perpetrator.

The College will investigate all complaints in relation to sexual abuse that may have occurred to students in its care:

- A complaint is a registration of dissatisfaction with the school, lodged verbally or in writing by a complainant or their representative. A complaint may be related to a specific episode, occurrence of failure in provision of service that has resulted in an impact on an individual or group. A general expression of concern is not a complaint;
- A complaint may be made by a person who was the victim of the alleged conduct, or their representative. Where the complainant is not the victim, they will need to demonstrate that they have the authorisation of the victim to make the complaint;
- A complaint may relate to the conduct of a current or past employee, contractor, volunteer or student;
- When received initially by reception or staff, the complainant should be referred to the Principal;
- The Principal will explain and refer the complainant to the Nazareth College Child Protection Reporting Policy and will encourage the complainant to outline their complaint in writing, if not already done so;
- In accordance with privacy legislation, Nazareth College will provide the complainant with full access to and copies of any information and records that contain information about their time at Nazareth College;
- The Principal will offer the support of the School Counsellor. The Canonical Administrators will be informed about the alleged abuse. The Principal will advise other relevant authorities, eg the Chair of the Board, CEM, the Police in accordance with Ministerial Order No 870;
- Should the complainant decide that they do not wish to proceed with the complaint, the Principal will offer appropriate support persons or organisations;
- Nazareth College may seek to proceed with an investigation after a complaint has been withdrawn where it deems it appropriate to do so, especially when it holds concerns for the welfare of any current or former students. Nazareth College will comply with all recommendations of Ministerial Order No 870.

Investigations

When the School is made aware of specific allegations/rumours/hearsay, then it will record the specific details in writing, in so far as they can be ascertained, and it will act in accordance with Ministerial Order No 870.

It will investigate these matters:

- If formalised as a complaint;
- If a current student is alleged to have been abused.



Nazareth College may investigate them if it believes this to be appropriate and, in making this decision, will have regard to factors such as:

- The particular circumstances involved;
- Whether corroborative evidence exists (eg similar allegations against an alleged perpetrator);
- Whether there is a reasonable belief that further harm could be done (eg the alleged perpetrator is still teaching at the school or elsewhere);
- The potential impact on the alleged victim.

Incidents involving a current student

The College would follow the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse and would involve the Child Safety Officers in the initial investigation.

Incidents involving a past student

Any allegations or complaints made by a past student or his or her representatives are to be referred to the Principal (or delegate) who will make the initial contacts and notes:

- The Canonical Administrators and Catholic Education Melbourne shall be informed as soon as possible;
- The welfare of the past student is paramount. Immediate access to counselling services is to be offered, as appropriate;
- The College will, as far as possible, seek to adopt an investigative process sympathetic to the complainant and appropriate to the circumstances;
- The Principal will convene a meeting with relevant senior staff to plan an investigation and record all relevant dates, details, names and locations. They may choose to use an outside agency such as the CEM at this point to ensure a balanced and professional investigation process. Insurers will be informed and may become involved when/if formal legal claims are made;
- All evidence will be given to the Canonical Administrators who will discuss the outcome of the investigation and decide on further action;
- All decisions will be explained and relayed personally to the complainant at the end of the investigative process;
- Should there be grounds for criminal investigation, the complainant will be strongly urged to refer the matter to the Police or, in matters of mandatory reporting, Nazareth College will report the matter itself. If this is the case, the school should follow the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse to ensure that any new information received through a complaint or concern from a member of the school Community is reported to authorities where required.

Incidents involving a current staff member

- Any allegations or complaints made about a current staff member are to be referred to the Principal who will make the initial contacts and notes;
- The Principal shall be informed as soon as possible and they will inform the Canonical Administrators;
- The School will, as far as possible, seek to adopt an investigative process sympathetic to the complainant and appropriate to the circumstances;
- The staff member will be informed of allegations against them and be asked to take leave with pay while the matter is investigated;



- The Principal will convene a meeting with relevant staff to plan an investigation and record all relevant dates, details, names and locations. The CEM will be advised and invited to oversee the process to ensure a balanced and professional investigation. Insurers will be informed and may become involved when/if formal legal claims are made;
- All evidence will be given to the Canonical Administrators who will discuss the outcome of the investigation and decide on further action;
- All decisions will be explained and relayed personally to the complainant at the end of the investigative process;
- Should there be grounds for criminal investigation, the complainant will be strongly urged to refer the matter to the Police or, in matters of mandatory reporting, Nazareth College will report the matter itself;
- If the matter is deemed to be reportable conduct, the Principal will follow the required steps in the school's reportable conduct policy.

REFERENCES

Catholic Education Commission of Victoria Ltd (CECV) 2018, Victorian Catholic Education Multi Enterprise Agreement 2018, CECV.

http://www.cecvcatholic.edu.au/vcsa/Agreement_2013/VCEMEA_2018.pdf

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Millennium, Vatican, http://www.vatican.va/roman_curia/congregations/ccatheduc/documents/rc_con_ccatheduc_doc_27041998_school2000_en.html.

Department of Education, 2016, PROTECT: Identifying and responding to all forms of abuse in Victorian schools

State of Victoria 2016, Child Safe Standards – Managing the Risk of Child Abuse in Schools: Ministerial Order No. 870, Education & Training Reform Act 2006, Victorian Government Gazette No. S2. Parliament of Victoria, Family and Community Development Committee, 2013, Betrayal of Trust

Section Three

CHILD SAFETY CODE OF CONDUCT



Child Safety – Code of Conduct

At Nazareth College we hold the care, safety and wellbeing of children and young people as a central and fundamental responsibility of our school. Our commitment is drawn from and inherent in the teaching and mission of Jesus Christ, with love, justice and the sanctity of each human person at the heart of the gospel (CECV Commitment Statement to Child Safety). The person of each individual human being, in his or her material and spiritual needs, is at the heart of Christ's teaching - that is why the promotion of the human person is the goal of the Catholic school (Congregation for Catholic Education 1997, n. 9). Our values are underpinned by our commitment to bear witness to the following shared values as modelled by Jesus Christ

Purpose

This Code of Conduct has a specific focus on safeguarding children and young people at Nazareth College against sexual, physical, psychological and emotional abuse or neglect. It is intended to complement child protection legislation, school policies and code of conduct in relation to child safety, mandatory reporting and safety of young people and Victorian Institute of Teaching Codes of Conduct as these apply to staff and personnel.

All staff, volunteers, contractors, clergy and board members at Nazareth College are expected to actively contribute to a school culture that respects the dignity of its members and affirms the Gospel values of love, care for others, compassion and justice. They are required to observe child safe principles and expectations for appropriate behaviour towards and in the company of children, by:

1. Upholding the safety and wellbeing of students;
2. Empowering members of the Nazareth Community to have a voice and raise concerns in matters of child safety;
3. Implementing simple, clear and effective practices in risk-management and employment regarding child safety.

Upholding the safety and wellbeing of students

All staff, volunteers, contractors, clergy and members of the Nazareth Advisory Committee are responsible for upholding the safety and wellbeing of students by:

- Adhering to Nazareth College's Child Protection and Child Safety Policy and upholding the school's statement of commitment to child safety at all times;
- Taking all reasonable steps to protect the young people in our care from abuse;
- Treating everyone in the school Community with respect modelling positive and respectful relationships and acting in a manner that sustains a safe, educational and pastoral environment;
- Promoting the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander young people;
- Promoting the cultural safety, participation and empowerment of young people with culturally and/or linguistically diverse backgrounds;
- Promoting the safety, participation and empowerment of young people with a disability;
- If an allegation of child abuse is made, ensuring as quickly as possible that the young person/people are safe in accordance with the schools Child Protection and Child Safety Policy and legislative requirements;
- Ensure that the appropriate protocol is followed with regard to school related contact with a student outside scheduled school hours;



- Ensure that the Code of Conduct is followed in any interactions with College students or other young people outside scheduled school hours eg Sunday Mass, coaching of local sports teams, attendance at local events.

In upholding the safety and wellbeing of students

All staff, volunteers, contractors, visitors, clergy and members of the Nazareth Advisory Committee must not:

- Exhibit behaviours with young people which may be construed as unnecessarily physical;
- Engage in open discussions of a mature or adult nature in the presence of young people unless directly related to the curriculum;
- Use inappropriate language in the presence of young people;
- Express personal views on culture, race or sexuality in the presence of young people;
- Discriminate against any young person, on the basis of age, gender, race, culture, vulnerability, sexuality, ethnicity or disability;
- Photograph or video a young person, except in the case of activities connected with learning and teaching, without the consent of the parent or guardians;
- Work with a young person while under the influence of alcohol or illegal drugs;
- In the school environment, or at other school events where students are present, consume alcohol contrary to school policy or take illicit drugs under any circumstances;
- Have contact with a young person or their family outside of school without the school's Leadership Team's knowledge (for example, unauthorised after hours tutoring, private instrumental/other lessons or sport coaching). This does not include accidental contact, such as seeing people in the street. Staff who will have contact with students outside the college setting, should list these known interactions with students at the bottom of the Code of Conduct or in the Staff Professional Boundaries policy. This enables a culture of awareness to be created whereby, through a range of diverse activities and associations, staff do not compromise themselves in relation to the child safe standards**;
- Have school related contact with a college student outside scheduled school hours without the authorisation of College Leadership.

Empowering members of the Nazareth community to have a voice and raise concerns in matters of child safety

All staff, volunteers, contractors, clergy and members of the Nazareth Advisory Committee are responsible for:

- Listening and responding to the views and concerns of young people, particularly if they are telling you that they or another young person have been abused or that they are worried about their safety or the safety of another young person;
- Reporting any allegations of child abuse as outlined in the child protection – reporting obligations;
- Understanding and complying with all reporting obligations as they relate to mandatory reporting and reporting under the crimes act 1958 (vic.) and as contained in the school's Child Safety Policy;
- Reporting any child safety concerns as outlined in the Child Protection and Child Safety Section Two – Reporting Obligations.

In empowering members of the Nazareth community to have a voice and raise concerns in matters of child safety



All staff, volunteers, contractors, visitors, clergy and members of the Nazareth Advisory Committee must not:

- Ignore or disregard any suspected or disclosed child abuse.

Implementing simple, clear, and effective practices in risk-management and employment regarding child safety

All staff, volunteers, contractors, clergy and members of the Nazareth Advisory Committee are responsible for:

- Ensuring as far as practicable that adults are not alone with a young person;
- Ensuring child safety protocols in the College employment protocol are implemented;
- Ensuring risk assessments for the appointment, and school related work, of contractors incorporate child safety;
- Ensuring risk assessments for off campus school related student involvement;
- Incorporate child safety into everything that occurs at the College.

In implementing simple, clear, and effective practices in risk-management and employment regarding child safety

All staff, volunteers, contractors, visitors, clergy and members of the Nazareth Advisory Committee must not:

- Develop any 'special' relationships with young people that could be seen as favouritism (eg the offering of gifts or special treatment for specific young persons);
- Put young people at risk of abuse (eg by locking doors);
- Initiate unnecessary physical contact with young people or do things of a personal nature that a young person can do for themselves, such as toileting or changing clothes;
- Have any online contact with a young person (including by social media, email, instant Messaging etc) or their family, unless that contact is to provide information about the school, or connected directly to the school work of the enrolled student (refer Social Media Policy);
- Use any personal communication channels/device such as a personal email account to make contact with a student;
- Exchange personal contact details such as phone number, social networking sites or personal email addresses with a student.



Nazareth College Child Safety Code Of Conduct

Introduction

A Child Safety Code of Conduct lists behaviours that are acceptable and those that are unacceptable. It provides a high-level statement of professional boundaries, ethical behaviour and acceptable and unacceptable relationships. For more detailed guidance refer to the school's staff and student Professional Boundaries Policy.

When individuals are clear about behavioural expectations, they are much more likely to act appropriately with each other and with children. When everyone is educated about the Code of Conduct and the reasons it is so important to uphold, the school environment becomes much more transparent and people are accountable for their behaviour. Above all, a Child Safety Code of Conduct helps to protect children from harm. The Code of Conduct applies in all school situations.

The Child Safety Code of Conduct applies to:

- All staff members, including non teaching staff and temporary or casual staff;
- Volunteers (of all types);
- Clergy;
- Third Party Contractors and service providers (including External Education Providers);
- Members of the Nazareth Advisory Committee;
- Teaching students on placement at the school;
- Visitors;
- Any other member of the school Community involved in child related work.

Our Child Safety Code of Conduct

This Child Safety Code of Conduct outlines appropriate standards of behaviour for all adults towards students. The Code serves to protect students, reduce any opportunities for abuse or harm to occur, and promote child safety in the School environment. It provides guidance on how to best support students and how to avoid or better manage difficult situations. Where a staff member breaches the Code, Nazareth College may take disciplinary action, including in the case of serious breaches, dismissal.

The school reviews the Code annually. Nazareth College has the following expectations of behaviours and boundaries for all adults of the school Community involved in child related work within our school Community. This includes all teaching staff, non teaching staff, members of the Nazareth Advisory Committee, volunteers, third party contractors, parents and guardians, students on placement and external education providers.

Nazareth College is a child safe school as it provides staff, members of the Nazareth Advisory Committee, volunteers, clergy and third party contractors, with regular opportunities to address child safety measures. This is done through ongoing training and professional learning. Nazareth College, the staff, members of the Nazareth Advisory Committee, volunteers, clergy and third party contractors understand and are compliant in their professional and legal obligations regarding Child Safety Standards as outlined in Ministerial Order No. 870.



DO:

- Support the Ethos and uphold the mission and values of Nazareth College;
- Behave as a positive role model to students. Promote the safety, welfare and wellbeing of students;
- Be vigilant and proactive with regard to student safety and child protection issues;
- Provide age appropriate supervision for students.;
- Comply with guidelines published by the school with respect to child protection;
- Always meet with students in an area visible to other staff members;
- Treat all students with respect;
- Promote the safety, participation and empowerment of students with a disability;
- Promote the cultural safety, participation and empowerment of linguistically and culturally diverse students;
- Promote the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students;
- Use positive and affirming language toward students;
- Encourage students to express their opinions and their concerns and listen to them with respect;
- Respect cultural, religious and political differences;
- Help provide an open, safe and supportive environment for all students to interact, and socialize;
- Intervene when students are engaging in bullying behaviour towards others or acting in a humiliating or vilifying way;
- If you feel a member of the Nazareth College Community has breached any aspects of this Code, report your concerns to a member of the Nazareth College Leadership Team;
- Where an allegation or disclosure of child abuse is made, ensure as quickly as possible that the student involved is safe;
- Call Police on 000 if you have immediate concerns for a student's safety;
- Report any concerns about child safety to the Assistant Principal Faith and Wellbeing, Directors of Wellbeing or the College Counsellor – all are Child Safety Officers;
- Ensure that Mandatory Reporting and all legal obligations to report allegations are met;
- Respect the privacy of students and their families and only disclose information to people who have a need to know;
- Handle all personal information in accordance with the College's Privacy Policy;
- All communication with students will be via the Nazareth College email system (unless there is a safety concern or other urgent matter).

DO NOT:

- Engage in any form of inappropriate behaviour towards students or expose students to such behavior;
- Use prejudice, oppressive behaviour or inappropriate language with or in the presence of students;
- Discuss content of an intimate nature or use sexual innuendo with, or in the presence of students, except where it occurs relevantly in the context of parental guidance, delivering the educational curriculum or a therapeutic setting;



- Treat a child unfavourably because of their disability, age, gender, race, culture, vulnerability, sexuality or ethnicity;
- Engage in inappropriate discussions of an adult nature in the presence of students;
- Engage in any form of sexual conduct with a student including making sexually suggestive comments and sharing sexually suggestive material;
- Engage in inappropriate or unnecessary physical conduct or behaviours including doing things of a personal nature that a student can do for themselves, such as toileting or changing clothes;
- Engage in any form of physical violence towards a student including inappropriately rough physical play;
- Use physical means or corporal punishment to discipline or control a student (except in situations where the student's behaviour poses an imminent risk/threat of physical harm or danger to self or others - where such action would be considered reasonable in the circumstances and where there is no less restrictive means of responding in the circumstances).
- Engage in any form of behaviour that has the potential to cause a student serious emotional or psychological harm.
- Develop 'special' relationships with students that could be seen as favouritism (eg the offering of gifts or special treatment for specific students);
- Accept inappropriate gifts from students or families. Gifts maybe inappropriate based on their value, the nature of the gift, the reason for the gift etc. If a staff member is uncertain whether a gift is inappropriate, they should consult one of the Child Safety Officers;
- Engage in undisclosed private meetings that are not of an educational nature with a student who is not your own child;
- Be alone with students in an area not visible to other staff members;
- Communicate directly with a student through personal or private contact channels (including by social media, email etc) except where that communication is reasonable in all the circumstances, related to school work or extracurricular activities or where there is a safety concern or other urgent matter;
- Have any links with students on social media;
- Socialise out of school with any student who is not a relative unless disclosures have been declared;
- Take or publish (including online) photos, movies or recordings of a student without parental/guardian consent;
- Take or publish (including online) photos, movies or recordings in any personal forum except in accordance with school policy or where required for duty of care purposes;
- Use a personally owned device (eg your own phone, camera or iPad) to take photos, videos etc of students except in accordance with school policy or where required for duty of care purposes;
- Post online any information about a student that may identify them such as their - full name, age, email address, telephone number, residence, school, or details of a club or group they may attend;



- Ignore or disregard any suspected or disclosed child abuse.

Report any concerns

By observing these standards, staff, members of the Nazareth Advisory Committee, volunteers, clergy, third party contractors, and other Community members associated with our school acknowledge their responsibility to immediately report any breach of this Code or concerns that a child may be subject to abuse are asked to contact a Nazareth Child Safety Officer. Our Child Safety Officers can be contacted by calling 9795 8100 or by email childsafety@nazareth.vic.edu.au.

Communications will be treated confidentially on a 'need to know basis' and all personal information will be dealt with in accordance with the School's Privacy Policy. If any staff member, member of the Nazareth Advisory Committee, volunteers, clergy, third party contractors breaches this Code of Conduct, they may face disciplinary action, including and up to termination of employment or cessation of engagement with Nazareth College.

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

This Code of Conduct will be reviewed in September 2020

I have received, read, understood and consent to the Nazareth College Code of Conduct

Name:

Signature:

Date:.....

Position:.....

WWCC or VIT Number:.....

Where a staff member breaches the Nazareth College Child Safety Code of Conduct or fails to disclose interactions with students to the College Leadership, Nazareth College may take disciplinary action, including in the case of serious breaches, summary dismissal in accordance with the Victorian Catholic Education Multi Enterprise Agreement 2018.



Disclosure of Staff/Student Interactions

Examples of possible interactions with students outside the school setting may include:

- Staff member has a child at school whose school friends come around to the teacher/child's house;
- Being related to the student;
- Friends with the student's parents or family;
- Staff member coaches the local netball team - students from the school compete both in that team and in other teams – coach may not be aware of students in other teams until match day;
- Staff member attends local sporting matches as a spectator in which students from the school are competing please list below any situations where you may have interactions with students outside the school setting;
- Immediately report any conflicts of interest and remove themselves from decision making where a conflict has been identified;
- Follow the guidelines as set out in this policy;

Nazareth College will maintain records of all declarations made by staff members related to their interactions with students, or relationships with students, that exist outside of school hours or College premises. These records are kept for a period of seven (7) years.

Please list below any situations where you may have interactions with students outside the school setting. _____

Student Name	Pastoral Group	Interaction with Student/s	Parents aware of interaction	Date

I _____, confirm I have listed any known interactions with students. I will update this list when/if there is any alternation to my situation.

Signed: _____ Date: _____



Child friendly version of our Child Protection And Child Safety Policy

At Nazareth College we have a child friendly version of our child protection and child safety policy because we are committed to the care, safety and wellbeing of all students at our College.

What Does Our School Value and Why Is Child Safety Important In Our School?

At Nazareth College we have a policy about child safety because Nazareth College is committed to the care, safety and wellbeing of all students at our College. The policy demonstrates our commitment and gives an outline of what Nazareth College does to keep students safe from harm, including all forms of abuse in our College environment, on campus, online and in other locations provided by the College. The policy applies to school staff, including school employees, volunteers, contractors and clergy.

What Are the Important Ideas That Guide Our Actions?

Nazareth College believe that:

- All students deserve, as a fundamental right, safety and protection from all forms of abuse and neglect;
- Our school works in partnership with families and the Community to ensure that they know about decision making processes, particularly those that have an impact on child safety and protection;
- All students have the right to an education in all aspects of personal safety, in partnership with their parents/guardians/caregivers;
- All adults in our school have a responsibility to care for children and young people, to positively promote their wellbeing and to protect them from any kind of harm or abuse;
- All involved in situations where harm is suspected and disclosed must be treated with sensitivity, dignity, respect and in confidence;
- All students should feel free to raise concerns about child safety, knowing these will be taken seriously by staff members at Nazareth College;
- Appropriate confidentiality will be maintained, with information being provided to those who have a right or a need to be informed, either legally or pastorally;
- Our policies, guidelines and Code of Conduct for the care/wellbeing and protection of students are based on honest, respectful and trusting relationships between adults and children and young people;
- Our policies and practices demonstrate compliance with legislative requirements and cooperation with the church, governments, the Police and human services agencies.

What Pledges Do We Make To Our School Community?

Our commitment to our *students*:

- We commit to the safety and wellbeing of all children and young people enrolled in our school;
- We commit to providing children and young people with positive and nurturing experiences;
- We commit to listening to children and young people and empowering them by taking their opinions seriously, and addressing any concerns that they raise with us;
- We commit to taking action to ensure that children and young people are protected from abuse or harm;
- We commit to teaching children and young people the necessary skills and knowledge to understand and maintain their personal safety and wellbeing;
- We commit to seeking input and feedback from students regarding the creation of a safe school environment.



Why do we have a Code of Conduct for adults working in our school?

The Nazareth College Child Safety Code of Conduct recognises the critical role College staff play in protecting the students in our care and establishes clear expectations of school employees, volunteers, contractors, and clergy for appropriate behaviour with children in order to safeguard them against abuse and or neglect.

Adults working at Nazareth College, are expected to proactively ensure the safety of students at all times and to take appropriate action if there are concerns about the safety of any child at the school

Having a Code of Conduct means all College staff must remain familiar with the relevant laws, and policies and procedures in relation to child protection and to comply with all requirements

How Are Students Involved In Child Safety Discussions And Planning For Improvements In Our School?

At Nazareth College we actively encourage all students to openly and respectfully express their views and feel comfortable to talk about the things that are important to them. We teach students about what they can do if they feel unsafe and help them to understand, identify and discuss and report on child safety. We listen to, and act on, any concerns students or their parents/guardians raise with us.

At Nazareth College, we help students to understand what child abuse is. We educate our students about the way they can report concerns. Participation and empowerment is taught through discussion and forums which are delivered through our pastoral care and teaching programs.

How Do We Report Our Concerns and How Do Teachers Respond?

If you have been abused or feel unsafe, you can tell a teacher, or any adult at our school. All school staff members have a responsibility to protect any child under their care. They will be able to help you. If you think someone has been abused, or is unsafe, you should talk to an adult you trust. Any staff member at our school will be able to help. Help your friend by encouraging them to tell a trusted adult. Even if your friend has specifically asked you not to tell an adult, you still should. It is more important to make sure that your friend is helped and feels protected. The school records any child safety complaints. All school staff members have a responsibility to protect any child under their care. You will be helped.

- The staff member will listen to your concerns and help you;
- The information will not be shared with the person who is making you feel unsafe;
- Information will only be shared with people who can support and protect you;
- In some cases, the people helping you are required by law to tell the Police. The Department of Health and Human Services (DHHS) Child Protection services and/or your family to prevent any further abuse, or risk of abuse.

Information will only be shared with people who can help, support and protect you. It will not be shared with the person who is making you feel unsafe.

How Are Staff Selected to Work In Our School?

Nazareth College have strict checking processes when we hire people or use volunteers. Our commitment to child safety and our checking requirements are included in all advertisements and all new staff applicants are provided with copies of the school's Child



Safety Policy. Staff and volunteers must sign that they continue to meet child safety requirements such as working with children clearances

How Does the School Support Staff to Develop Their Knowledge About Child Safety?

All school staff are provided with our child safe reporting policies that are required by law. Training is also provided at meetings and through online courses. Presentations are provided as part of the schools yearly training program.

How Does Our School Identify Possible Risks, Who Is Involved And What Happens Next?

At Nazareth College we are committed to always looking for things that might be a risk to student safety across our whole school environment. If a new risk is found, we ensure it is fixed and is added to our documents to be sure that is thought about in future planning.

What Other Information Do We Use to Help Us?

Nazareth college have policies that guide our Community to ensure our students are safe. Below are examples of the policies that we have:

- 1) Child Protection and Child Safety Policy;
- 2) School Guidelines – Police and DHHS Interview Protocols;
- 3) Code of Conduct Policy;
- 4) Child Protection Reporting Obligations.

Any member of the Nazareth College Community or wider community can contact the Principal's office for access to these documents.

How Does the School Let Everyone Know About the Policy and Our Plans?

The College will keep everyone informed through a variety of ways:

- College Newsletter;
- Student and staff notices electronically and around the school;
- Posters;
- Emails;
- Assemblies;
- Parent Access Module (PAM);
- College Website;

When will we update this policy?

This policy will be reviewed each year to ensure it remains up to date with current legislative requirements.



Reducing or removing risks of child abuse

Nazareth College develops, implements, monitors and evaluates risk management strategies to ensure child safety in school environments, in accordance with Ministerial Order 870.

REQUIREMENTS	IMPLEMENTATION
The school governing authority must develop and implement risk management strategies regarding child safety in school environments	<ul style="list-style-type: none"> • Development and review of risk register • This is monitored by the Child Safety Committee • Minutes of Child safety meetings • Principal informs governing authority on child safety risks at board meetings • Child safety to be a standing item at all meetings
The school's risk management strategies regarding child safety must identify and mitigate the risk(s) of child abuse in school environments by taking into account the nature of each school environment, the activities expected to be conducted in that environment (including the provision of services by contractors or outside organisations), and the characteristics and needs of all children expected to be present in that environment.	<ul style="list-style-type: none"> • Risk register identifies specific risks such as visitors, external providers and contractors • Considers the diversity of student needs • Different environments are identified and assessed including camps, excursions and school events. These have a separate Risk treatment Plan (Appendix B).
If the school governing authority identifies risks of child abuse occurring in one or more school environments the authority must make a record of those risks and specify the action(s) the school will take to reduce or remove the risks (risk controls). Explanatory note: Different risk controls may be necessary for particular groups of children depending on the nature of the risk and the diversity characteristics of children affected by the risk.	<ul style="list-style-type: none"> • Records are kept securely and confidentially • The risk register is regularly reviewed to further mitigate such risks • Principal informs governing body of risk management and any concerns.
As part of its risk management strategy and practices, the school governing authority must monitor and evaluate the effectiveness of the implementation of its risk controls.	<ul style="list-style-type: none"> • OHS committee oversee risk management at Nazareth • Child Safety Committee work in collaboration with OHS Committee to identify, mitigate and review risks. • The risk register is regularly reviewed at Child Safety and OHS Committee meetings
At least annually, the school governing authority must ensure that appropriate guidance and training is provided to the individual members of the school governing authority and school staff (about:	<ul style="list-style-type: none"> • Review of child safety policy, procedures and practices including roles and responsibilities are attended at first staff meeting before students resume at the beginning of each year. An

<ul style="list-style-type: none"> • individual and collective obligations and responsibilities for managing the risk of child abuse; • child abuse risks in the school environment; and • the school's current child safety standards 	<p>additional session is held for staff members absent at this meeting</p> <ul style="list-style-type: none"> • Emergency teachers have an induction on child safety before commencing each year. • Staff induction program includes child safety • External providers and contractors must sign Code of Conduct each year. • Staff participate in ongoing training and professional learning in child safety and associated risks • Professional learning for child safety is identified in annual whole school professional learning plan • Child safety officers attend specific professional learning and network meetings on child safety • Posters displaying procedures to follow up on child safety issues are displayed in classrooms, staff areas and general areas. • Child Safety information in newsletter and staff, parent and student handbooks
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Nazareth College - Child Safety - Risk Assessment

Nazareth College takes steps to protect children from abuse. However, we acknowledge that there is always more that can be done, particularly in respect to ensuring that a school's risk management strategies meet all the child safety requirements set out in Ministerial Order No. 870.

The school's risk management strategies regarding child safety must identify and mitigate the risk(s) of child abuse* in school environments by taking into account the nature of each school environment*, the activities expected to be conducted in that environment (including the provision of services by contractors or outside organisations), and the characteristics and needs of all children expected to be present in that environment.

To this end Nazareth College employ a variety of risk management strategies suggested by both the Victorian Government Department of Education, Employment and Training and the Victorian Registration and Qualifications Authority (VRQA). These strategies are to be used in conjunction with our OH&S, Child Safety Code of Conduct, Child Safety Policy and other associated policies and must also be regularly reviewed to ensure optimal effectiveness as new risks arise. The Deputy Principal - Strategic Management is responsible for ensuring that professional development, training and guidance is provided to staff on how to navigate child safety risk assessment protocols across a variety of educational environments.

Nazareth College understands that the Ministerial Order specifies the following requirements for schools regarding Standard 6:

1. The school governing authority must develop and implement risk management strategies regarding child safety in school environments;
2. The school's risk management strategies regarding child safety must identify and mitigate the risk(s) of child abuse in school environments by taking into account the nature of each school environment, the activities expected to be conducted in that environment (including the provision of services by contractors or outside organisations), and the characteristics and needs of all children expected to be present in that environment;
3. If the school governing authority identifies risks of child abuse occurring in one or more school environments the authority must make a record of those risks and specify the action(s) the school will take to reduce or remove the risks (risk controls).
Explanatory note - different risk controls may be necessary for particular groups of children depending on the nature of the risk and the diversity characteristics of children affected by the risk.
4. As part of its risk management strategy and practices, the school governing authority must monitor and evaluate the effectiveness of the implementation of its risk controls;
5. Annually, the school governing authority must ensure that appropriate guidance and training is provided to the individual members of the school governing authority and school staff members about:
 - individual and collective obligations and responsibilities for managing the risk of child abuse;
 - child abuse risks in the school environment;
 - the school's current Child Safety Standards."

Process for identifying and reducing or removing risks of child abuse

Managing risk at Nazareth College typically involves the following steps and considerations. These guidelines are to be utilised in accordance with the VRQA Checklist for minimising Risk (Appendix 1).



- Identify the child safety risks across the range of school environments including excursions, camps, online using the Risk Assessment Matrix. (at the bottom of this document);
- Identify any existing risk mitigation measures or internal controls;
- Assess and rate the school's child safety risks given the existing controls in place, taking into account the likelihood of risk, and the likely consequence of the risk;
- If the risk rating is more than the 'acceptable level', identify further risk management strategies through additional controls or other prevention, detection or mitigation strategies and then re-assess the risk.

It is the responsibility of the Deputy Principal - Strategic Management to ensure that the risk management process is documented, recorded and reviewed periodically. Effective risk management strategies are dynamic and change over time as new risks arise and others may no longer be relevant. The Nazareth College governing body understands that effective risk management strategies need to be transparent, well understood and diverse, to take account of the increased level of risk associated with the specific nature of some activities and the vulnerability of particular groups. The College risk management strategies will be made accessible via the college intranet.

Risk Assessment

Effective Risk Management includes a process for assessing identified Child Safety Risks in a systematic manner taking into account the likelihood and consequences of each Risk identified:

- **Child Safety Risk** - A risk is the likelihood that a location, event or situation has the potential to cause harm or difficulty, to children or young people in the school environment;
- **Likelihood** means the chance of risk occurring;
- **Consequence** means the extent of the harm should the risk actually occur.

It is important that the process assists in gathering as much information as possible about the identified Child Safety Risks and then to think about how it may adversely affect children. The use of a risk matrix, such as a Qualitative Risk Assessment Table (see below), can assist in establishing the seriousness of the risk.

Potential Child Safety Risks and Risk Management Strategies

The following comprises a listing of potential child safety risks and appropriate risk management strategies outlined by the College. These risks have been identified utilising the Child Safe Standards Risk Assessment Template. These lists are not intended to be exhaustive.



CHILD SAFE STANDARD 6: RISK REGISTER

Risk Event or Environment	Existing Management strategies or internal controls	Likelihood of occurring	Consequence if occurs	Current risk assessment	Effectiveness of existing controls	Who is responsible?
No organisational culture of child safety	<ul style="list-style-type: none"> Child safety code of conduct Strategies developed to embed culture of child safety Strategies to embed organisational culture of child safety are reviewed Statement of commitment to child safety is publicly available on the website Induction Procedures updated Board meetings scheduled throughout the year with ongoing agenda items of child safety 	Unlikely	Severe	High	Satisfactory	Principal, Canonical administrator
Inappropriate behaviour is not reported and addressed	<ul style="list-style-type: none"> Child safety code of conduct Clear child safety reporting procedures Performance management procedures Professional Boundaries procedures Train students and staff to detect inappropriate behaviour Strategies to embed organisational culture of child safety are reviewed Refresher training for staff – see eLearning mandatory reporting module 	Unlikely	Severe	High	Satisfactory	Principal, Canonical administrator
Unquestioning trust of long term employees and contractors or norms	<ul style="list-style-type: none"> Strategies developed to embed culture of child safety Clear child safety reporting procedures (Protect, Reportable Conduct Scheme) Refresher training for staff – see eLearning mandatory reporting module Reportable conduct professional development and reading Performance management procedure 	Likely	Major		Satisfactory	Principal



Nazareth College Child Protection/Safety P4.8

Recruitment of an inappropriate Person	<ul style="list-style-type: none"> • WWCC or Victorian Institute of Teaching registration • Reference Checks of candidates and questions related to Child Safety • ARM's • Nazareth College Job Application Forms 	Low	Major	High	Satisfactory	Principal/ Deputy Principal
Ad-hoc contractors on the premises (e.g. maintenance)	<ul style="list-style-type: none"> • Child safe environments • Information and awareness for visitors, volunteers and contractors • Adequate monitoring • Sign-in procedures • WWCC for all visitors and consistent monitoring of those without • Induction for all visitors, staff, volunteers and contractors 	Unlikely	Major	Medium	Satisfactory	Principal/Deputy Principal/Business manager
Engagement with Children online	<ul style="list-style-type: none"> • E-Smart accreditation (in progress) • Digital Device Policy • Code of Conduct • Professional boundaries policy 	Likely	Moderate	High	Satisfactory	Principal/deputy Principal
Children alone with one other person unsupervised	<ul style="list-style-type: none"> • Supervision or monitoring of activities • Glass in windows in hot spots • Clear child safety reporting procedures • CCTV for 'hot spot' areas • Assessment of new or changed physical environments for child safety risks 	Low	Moderate	Medium	Satisfactory	Principal
Unsupervised recreational or other activities	<ul style="list-style-type: none"> • Child safety code of conduct • Strategies developed to embed culture of child safety • Supervision or monitoring of activities • Clear child safety reporting procedures 	Low	Moderate	Medium	Satisfactory	Leadership Team
Vulnerability of staff and students due to unknown personal issues	<ul style="list-style-type: none"> • Counselling and wellbeing support • Child Safety code of conduct • EAP for staff • Professional Boundaries policy • Performance management procedures • Reportable Conduct Scheme • Child Safety Code of Conduct • Professional Boundaries Policy 	Likely	Moderate	High	Satisfactory	Principal and staff



Nazareth College Child Protection/Safety P4.8

False allegations	<ul style="list-style-type: none"> Strategies developed to embed culture of child safety Supervision or monitoring of activities Counselling and other resources 	Low	Moderate	Medium	Satisfactory	Principal, canonical administrators, staff	
Unknown people and environments at excursions and camps	<ul style="list-style-type: none"> Child safety code of conduct Strategies developed to embed culture of child safety Clear child safety reporting procedures Camps and Excursion Procedures and Policies in place including risk assessment Assessment of new or changed environments for child safety risks Ensure Code and strategies apply in all school contexts Supervision or monitoring of activities 	Unlikely	Moderate	Medium	Satisfactory	Principal, Board, Leadership team, staff	
Ad-hoc contractors on the premises (e.g. maintenance)	<ul style="list-style-type: none"> Child safe environments Information and awareness for visitors, staff, volunteers and contractors Adequate monitoring Sign in Procedures WWC for all visitors and consistent monitoring of those without. Induction for all visitors, staff, volunteers and contractors Supervision or monitoring of activities 	Unlikely	Moderate	Medium	Satisfactory	Principal, Business manager/ Administration Staff	
Unknown people on school grounds	<ul style="list-style-type: none"> Training of staff in procedures to approach visitors without the correct visitor sticker All visitors to the school required to sign in via school sign in on iPad and display visitor sticker at all times. Yard Duty Staff to be vigilant at all times. Follow Catholic Education Melbourne procedures if an incident occurs. 	Low	Moderate	Medium	Satisfactory	All Staff	



Nazareth College Child Protection/Safety P4.8

Unknown People in immediate vicinity of the school – attempting to engage, are with children, looking at children or attempting to photograph	<ul style="list-style-type: none"> Follow current school procedure of reporting to the Principal and/or leadership team Staff member/Principal/leadership team to approach the individual and enquire about who they are Remove all children from harm Phone the police if an illegal/harmful occurrence has taken place Follow CEM procedures for reporting an incident 	Low	Major	High	Satisfactory	All Staff
Student comes to school stating they have been harmed by a family member or other individual	<ul style="list-style-type: none"> Staff trained in Mandatory reporting guidelines annually Follow the four critical actions procedure Follow reporting procedures at Nazareth College – report to the Child safety officer Report the Incident to the Catholic Education Office – Wellbeing Duty Officer and document on Protect Template 	Low	Moderate	Medium	Satisfactory	All Staff
Student with Additional needs is enrolled at the school e.g., <ul style="list-style-type: none"> Students with a disability Students from ATSI Background Students from CALD Background Students with Health Issues Students with behavioural challenges 	<ul style="list-style-type: none"> Inform the Child Safety / Wellbeing Officer / Counsellor/ Learning Diversity Leader Depending on the needs of the student the following may occur: Discussion with parents about student learning adjustments needed Referral for assessment involving CEM psychologists of CEM Speech Therapists or other support Contact made with previous education provider Application for funding from NCCD and/or CEM Students with behavioural challenges * follow the Child safety policy, wellbeing policy and associated policies 	Likely	Moderate	High	Satisfactory	All Staff



Nazareth College Child Protection/Safety P4.8

Student displays at risk behaviour <ul style="list-style-type: none"> Self- Harm Suicidal Ideation Depression Substance misuse 	<ul style="list-style-type: none"> Staff trained in mandatory reporting obligations Follow the wellbeing policy Follow the child safety policy Counselling and other support Follow reporting procedures at Nazareth College – report to the Child Safety Officer 	Low	Moderate	Medium	Satisfactory	All Staff
The school governing authority not monitoring of evaluating the effectiveness of the implementation of its risk controls	<ul style="list-style-type: none"> Child Safe action plan in place Ongoing Board meetings Standing agenda items at board meetings Standing agenda items at staff meetings 	Low	Moderate	Moderate	Satisfactory	Canonical Administrator/Principal
Student is injured at school <ul style="list-style-type: none"> During class time During recess 	<ul style="list-style-type: none"> All Staff trained in Level 2 First Aid and CPR All staff trained in Anaphylaxis and Asthma All teachers trained in current First Aid Policy and Procedures Full Time Qualified First Aid Officer First Aid Bags located in Sick Bay, Staff room and Nazareth College Buildings Bum bags with first aid supplies and EpiPen on duty teacher for offsite activities Policies in place – First Aid, Anaphylaxis and Asthma, OH&S 	Likely	Low	Moderate	Satisfactory	All staff

Child Safety Risk Register

For further information on the implementation and use of the template refer to the [VRQA Guide for developing and implementing Child Safety Risk](#)

- **Likelihood** means the chance of the situation or event occurring.
- **Consequence** means the extent of the harm/impact should it actually occur.

RISK LEVEL MATRIX						
Likelihood	Consequence					
		Insignificant	Minor	Moderate	Major	Severe
	Almost Certain	Medium	High	Extreme	Extreme	Extreme
	Likely	Medium	Medium	High	Extreme	Extreme
	Possible	Low	Medium	Medium	High	Extreme
	Unlikely	Low	Low	Medium	Medium	High
	Rare	Low	Low	Low	Medium	Medium

Appendix B: Risk Treatment Plan

Risk Treatment Plan for:	
Risk Owner:	
Date:	
Description of Risk:	
Controls and Actions to Mitigate Risks:	
Resources Required:	
Responsibilities and Task Owner/s:	
Monitoring and Reporting:	



Related documentation

This policy should be read in conjunction with the other policies and procedures of Nazareth College concerned with Child Safety and Wellbeing, Child Protection – Code of Conduct, Child Protection – Reporting Obligations, Child Protection and Child Safety, Pastoral Care Policy, Working with Children Check Policy.

Review of the Child Protection and Child Safety Policy

At Nazareth College we are committed to continuous improvement of our child safety systems and practices. We intend this policy to be a dynamic document that will be regularly reviewed to ensure it is working in practice and updated to accommodate changes in legislation or circumstance. We will maintain a history of updates to the policy.

Nazareth College is committed to the continuous improvement of our Child Protection Program and policies. The Policies are regularly reviewed for overall effectiveness and to ensure compliance with all child protection related laws, regulations and standards. These policies are to be reviewed at least every three years and we undertake to seek feedback from students, parents, guardians, staff and volunteers.

References

1. Victorian Parliamentary Inquiry into the Handling of Child Sexual Abuse by Religious and Other Non-Government Organisations, Final Report, Betrayal of Trust, November 2013.
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4. Child Wellbeing and Safety Amendment Act 2015 (Vic)
5. Crimes Act 1958 (Vic)
6. Family Law Act 1975 (Cth)
7. Education and Training Reform Amendment (Child Safe Schools Act 2015 (Vic)
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9. Victorian Parliamentary Inquiry into the Handling of Child Sexual Abuse by Religious and Other Non-Government Organisations, Final Report, Betrayal of Trust, November 2013.
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11. DEECD and DHS 2010, Protecting the Safety and Wellbeing of Children and Young People, A joint protocol of the Department of Human Services Child Protection, Department of Education and Early Childhood Development, Licensed Children's Services and Victorian Schools.
12. Working With Children Act (Vic) 2005
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16. Safe Schools Hub 2014, National Safe Schools Framework Glossary, Australian Government Department of Education and Training.
17. State of Victoria 2016, Child Safe Standards –Managing the Risk of Child Abuse in Schools:
18. Ministerial Order No. 870, Education & Training Reform Act 2006, Victorian Government Gazette No. S2.
19. Victorian Government Department of Justice 2016, Betrayal of Trust Implementation