



HERITAGE COLLEGE

CHILD PROTECTION MANUAL 2020



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PURPOSE

Commitment to Child Safety

Policy F3

This manual sets out recommended procedures to give effect to the Child Protection Policy.

Heritage College aims to provide an environment for education of children in a safe and supportive school environment. The College is committed to the total care of its students - physically, emotionally, intellectually and spiritually. The safety, protection and well-being of all students is of fundamental importance to the College.

All members of the College community have the responsibility to provide high quality interpersonal relationships of care and support, grounded in mutual respect, dignity, fairness, reconciliation, restoration, compassion and justice. Child protection is both a school and community responsibility to provide effective guardianship.

The objective of these processes and procedures are to protect, as far as possible, children from child abuse and to ensure their safety and wellbeing.

The Bible places responsibility upon parents and children in the performance of their respective roles:

Children: "to obey their parents in the Lord": Eph 6:1

Fathers: "to provoke not their children to wrath: but bring them up in the nurture and admonition of the Lord": Eph 6:4

All: "to do unto others as ye would that men should do to you": Lk 6:31

All to reflect a holy way of life as befits those who are called to be saints; immoral practice is forbidden. 2 Cor 7:1; 1 Thess 4:3; 1 Cor 3:16-17; 6:15-20.

Definitions

Unless the context otherwise requires:

"AISSA" Association of Independent Schools South Australia.

"Allegation" A claim or assertion, without definitive proof, that a wrongdoing (i.e. abuse or grooming of a child) has happened or is likely to happen.

"C.A.R.L." means the Child Abuse Report Line, ph 13 14 78, or online electronic notification through E-CARL at www.reportchildabuse.families.sa.gov.au

"Child abuse" is any significant conduct towards a child which is or may be detrimental to that child's physical, mental or emotional wellbeing, and includes neglect of the child. It is further defined in section 3

"Child" or **"children"** are persons under the age of 18 years at the time of the alleged abuse.

"CYPSA" is the Children and Young People (Safety) Act 2017

"Grooming" is actions by an adult, adolescent or child to develop opportunities to sexually offend against a child.

"Mandatory reporting" reporting carried out by a person who comes under one of the categories in s30(3) of the CYPSA and therefore is obliged to report suspicions of abuse and neglect as outlined under s31 of the CYPSA.

“Reasonable suspicion” (and including related phrases) is a slight opinion based on some credible evidence which is more than speculation, but less than a positive belief.

“Staff” or **“staff member(s)”** refers to Heritage College employees or volunteers, whether paid or unpaid unless otherwise specified.

“Victim” is a child who is reasonably suspected of being subject to child abuse.

“WHS” is Work Health & Safety.

PART A: CHILD ABUSE

What is Child Abuse?

- 1.1 Abuse is a misuse of power by the abuser over the victim. An abuser is usually someone older and more mature than the victim, but an abuser can be another child. While most abusers are in a position of authority over the child, such as a parent, teacher or caregiver or the like, it can be anyone whose actions directly affect the child.
- 1.2 Abuse can take a variety of forms which include:
 - 1.2.1 Physical abuse which is where victims suffer, or are likely to suffer, significant harm to their bodies.
 - 1.2.2 Emotional abuse which is a chronic attack on the victim’s self-esteem including by exposure to a dysfunctional environment including domestic violence.
 - 1.2.3 Sexual abuse which is where the abuser’s conduct towards the victim, viewed objectively, is for the sexual gratification of the abuser. It can include:
 - 1.2.3.1.1 fondling or inappropriate touching;
 - 1.2.3.1.2 oral sex;
 - 1.2.3.1.3 vaginal/anal penetration;
 - 1.2.3.1.4 digital penetration;
 - 1.2.3.1.5 exposure/involvement of a child to/in pornographic material;
 - 1.2.3.1.6 involvement in child prostitution; or
 - 1.2.3.1.7 child pornography.
 - 1.2.4 Neglect, which is the failure of a carer for a child to provide a child with the basic necessities of life, and which can occur by deliberate action or inaction and can stem from an inability to understand and provide basic necessities such as food, clothing, shelter, hygiene, medical treatment and supervision.

What is grooming?

- 2.1 Grooming is actions by an adult, adolescent or child to develop opportunities to sexually offend against a child.
- 2.2 Grooming is generally subtle and is usually clearly seen in hindsight. This is why it is important that any breach of policy or generalised concern is reported – this will allow for seemingly minor matters to be linked to identify a pattern of behaviour which may lead to abuse being prevented or early detection. An overview of grooming is in Appendix B.

Where reporting of child abuse to C.A.R.L. is required

- 3.1 A flowchart to guide the conversation is found in Appendix A.
- 3.2 This obligation is placed on all staff by Section 30 and 31 of the CYPSPA. It is a criminal offence not to comply with this obligation without a lawful excuse (see Appendix D).
- 3.3 If, but only if, each of (a), (b) or (c) below is satisfied for an incident of suspected child abuse, the staff member must notify C.A.R.L. of that suspicion as soon as practicable after he/she forms a reasonable suspicion that:
 - (a) there is conduct in relation to a child which is:

sexual abuse (see definition above); or
other abuse or neglect which causes, or is likely to cause, physical or emotional injury which is detrimental to the child's wellbeing or which puts the child's physical or psychological development in jeopardy.

(b) such conduct is reasonably suspected by the staff member to have occurred, or to be occurring; and

(c) that reasonable suspicion is formed in the course of working for Heritage College (a suspicion based on what is seen or heard elsewhere does not have to be reported under the Act, but it can be).

3.4 Reasonable suspicion in this context is a slight opinion based on some credible evidence which is more than speculation, but less than a positive belief. It must be based on some, albeit slight, positive evidence of the conduct and, for other than sexual abuse, of the requisite consequences.

3.5 Reasonable grounds to report suspected risk of harm to a child might include:

3.5.1 when a child tells you they are at risk or have been harmed

3.5.2 when your own observations of a particular child's behaviour and/or injuries lead you to suspect they are at risk or that harm is occurring

3.5.3 a child telling you that they know of someone who is at risk or has been harmed (they may possibly be referring to themselves)

3.5.4 when you hear about it from someone who is in a position to provide reliable information

3.6 However, if a staff member positively disbelieves what he/she has been told there can be no reasonable suspicion. It does not require proof that any child abuse has or is to occur.

3.7 Reporting to C.A.R.L. is done by telephoning the 24-hour Child Abuse Report Line on 13 14 78, or at www.reportchildabuse.families.sa.gov.au

3.8 Where a report is made to C.A.R.L. but only if the child and/or the suspected perpetrator is associated with Heritage College, staff must immediately inform the College Principal. A written Mandatory Notification Form is also to be given by the staff member to the College Principal as soon as practicable. These written reports will be stored securely by the College Principal.

3.9 In conjunction with employees or volunteers meeting their statutory obligations, they are encouraged to contact the Principal or Learning Support Leader to discuss any concerns they have in relation to their role as a mandated reporter and to consult on actual notifications.

3.10 In recognition of the ongoing responsibility of the College to protect and support its students and staff, any reported matters should be documented following which the Principal should determine what other action, if any, should be taken. This may include:

3.10.1 counselling the child(ren);

3.10.2 communicating with the parent(s);

3.10.3 taking protective action to keep the child or others safe;

3.10.4 discussing the matter with their ecclesia with the aim of providing support to those involved. Where applicable the principles of Matthew 18 and the Ecclesial Guide should always be observed.

3.11 The Principal will consult with the Chairman of Council regarding any reports made.

Reporting of other child abuse

4.1 If a worker reasonably suspects that child abuse has occurred involving either a child or a suspected perpetrator who is associated with Heritage College, but it does not satisfy all of the preceding requirements, he or she as soon as practicable must inform the College Principal and consult with the College Principal on whether a voluntary report should be made to C.A.R.L.

Other cases of reporting – Staff, Volunteers and Students

5.1 Where a staff member holds a view that any person associated with Heritage College is engaging in behaviour that could cause concern ('grooming'), or may include repeated

breaches of policy and procedure or engagement in low level behaviours of concern which could be indicative of grooming, he or she as soon as practicable must inform the College Principal and consult with the College Principal on whether a voluntary report should be made to C.A.R.L.

5.2 These Identified patterns of behaviour must also be actioned.

General provisions on all child abuse incidents

- 6.1 A staff member is not to inform anyone else of the suspected child abuse without the permission of the College Principal. The College Principal in consultation with the College Council will determine who else should be informed of it. (There is a danger of defamation liability against the staff member if ultimately the allegation cannot be proved).
- 6.2 The College will seek advice on procedural fairness from AISSA (Association of Independent Schools of South Australia)
- 6.3 Where there has been a complaint of alleged child abuse against a staff member and
 - 6.3.1 it is a term of the staff member's Employment Contract or
 - 6.3.2 the parties otherwise so agree,the continued employment of the staff member by Heritage College pending the final determination of the allegation of child abuse against him or her is to be decided by the College Council.
- 6.4 The functions of the College Council in this case are administrative and not judicial.
- 6.5 The College Council for the period until the final determination of the allegation of child abuse, may
 - 6.5.1 suspend the staff member with or without pay;
 - 6.5.2 modify the duties of the staff member;
 - 6.5.3 impose conditions on any continued employment of the staff member or on his or her involvement in the activities of the College;
 - 6.5.4 require that the staff member not communicate with specified persons;
 - 6.5.5 temporarily suspend the employment of the staff member while the College Council reaches other decisions; and/or
 - 6.5.6 revoke or modify any decision it has made.
- 6.6 In performing its functions, the College Council:
 - 6.6.1 is not bound by the rules of evidence and may inform itself of relevant facts by proper means as it sees fit.
 - 6.6.2 is to permit the staff member or his or her agent to address it.
 - 6.6.3 is to act with all reasonable expedition.
 - 6.6.4 is not to make conclusions about disputed facts relating to the alleged abuse.
 - 6.6.5 is as far as practicable to apply the Child Protection Policy of Heritage College and is not to allow the implementation of that Policy to be displaced by any presumption of the innocence of the staff member.
- 6.7 Heritage College and its staff will responsibly and reasonably cooperate with law enforcement and child protection authorities in their investigation and any prosecution of child abuse.
- 6.8 No staff members are to make any statement to the media about any child abuse encountered in the course of their employment and all inquiries about child abuse from the media are to be referred to the College Principal or the College Council Chair.
- 6.9 Staff members are not to make any statements about child abuse encountered in the course of their employment to any alleged perpetrator or anyone associated with or representing that alleged perpetrator.
- 6.10 Serious allegations of sexual misconduct against staff members must be immediately referred to the Principal who will notify the College Council and make a report to SA Police. Upon receiving any allegations against staff members about other forms of child abuse, the College Principal is to consult immediately with the College Council about what steps should be taken in respect of it.
- 6.11 The College Principal is to ensure that all appropriate professional support and pastoral care support is made available to all persons associated with the College who are impacted by the allegation.

- 6.12 Staff members are to be alert to any indicators of child abuse including
 - 6.12.1 when a child says that he/she has been abused;
 - 6.12.2 when a child or adult says that he/she knows of a child subject to abuse;
 - 6.12.3 observations of a child's behaviour, change in behaviour, emotional state and or injuries; or
 - 6.12.4 further indicators of abuse are found in Appendix C.
- 6.13 Indicators in many cases overlap and can interrelate to all forms of abuse and neglect. An indicator in isolation does not automatically mean that a child is being abused. Staff members should:
 - 6.13.1 listen to the child/young person;
 - 6.13.2 not ask leading questions;
 - 6.13.3 reassure the child that you believe him/her; (If that be the case).
 - 6.13.4 reassure the child that what has happened is not his/her fault;
 - 6.13.5 reassure the child that telling you was the right thing to do;
 - 6.13.6 document the child's disclosure as soon as possible. When documenting the disclosure use the same terminology as the child.
 - 6.13.7 not make promises which cannot be kept, such as confidentiality;
 - 6.13.8 reassure the child that there are people who can help to protect them.
- 6.14 A staff member is not an investigator and does not have to do any detective work. Even if the child abuse which is disclosed has ceased, reporting it is still necessary to protect other children from the abuser.
- 6.15 Where a student aged 18 years or over discloses that he or she was subject to child abuse while he or she was a child these procedures do not apply, but the student should be supported, encouraged to make a police report, and assisted in taking appropriate steps about the matter.

PART B: CHILD SAFETY RESPONSIBILITIES

Child Safety Responsibilities

- 7.1 Heritage College and its staff are to do everything reasonably available to them to promote the physical, emotional, mental and physical wellbeing and safety of the children who are involved in the life of the College ("the duty of care"). What is reasonable in a particular situation depends on its particular circumstances including the nature of the risk of harm to children and the practicability of the steps needed to eliminate it.
- 7.2 No set of detailed rules can be devised which when applied to a particular situation will clearly show what is the applicable duty of care. *Subsequent paragraphs herein contain guidelines which are prudent to observe.* They should only be departed from where a conscious and responsible decision has been made and the alternative satisfies the duty of care.
- 7.3 While Part B also applies generally to child abuse that issue is dealt with specifically in Section A.
- 7.4 Copies of the Duty of Care Policy (F4) and the Heritage College Code of Conduct are available for staff.

Role of Staff members

- 8.1 Any staff member at Heritage College must:
 - 8.1.1 be emotionally and spiritually suited to the role to be undertaken;
 - 8.1.2 adhere to the Heritage College Child Protection training strategy enumerated herein and abide by the Child Protection Policy and Child Protection Procedures Manual at all times
 - 8.1.3 have been selected for their role in work with children after proper screening of their suitability for such work;
 - 8.1.4 have their performance in such work periodically reviewed.

Children's participation

- 9.1 Heritage College employees and volunteers encourage children to make suggestions and express their views on matters that directly affect them. This can be facilitated in circle time, via conversation with their home group teachers and/or the wellbeing officer.
- 9.2 Children are taught child protection strategies through the Child Protection curriculum, There are multiple means by which they can communicate any concerns, including to their home group teacher or well-being officer.
- 9.3 *Employees and volunteers will listen to and act on any concerns raised by children or their parents and are made aware of this responsibility through volunteer training and staff induction.*

Physical health and safety

- 10.1 The physical environment should always be such that the safety of children is paramount. Staff members are expected to conform to all WHS policies and procedures and be proactive about their own health and safety and that of others including students. All staff members are expected to participate in a Staff Induction Program when they first begin employment. A copy of the WHS Policies are available.
- 10.2 *All staff members will take reasonable care to identify risks in regard to any activity they provide and take reasonable steps to provide a safe experience for the students. Before any incursion, excursion, or outdoor experience a risk management form must be completed and filed with other documentation in regard to that activity.*

Transportation

Policy E7

- 11.1 *If it is necessary to use staff member's vehicles to transport students as part of a school activity, documentation must be handed to the Front Desk before leaving and the following conditions must be met:*
 - 11.1.1 The driver must hold a current driver's license.
 - 11.1.2 The driver must be a staff member with a current Working with Children Check. They must have undergone Volunteer training (if a volunteer).
 - 11.1.3 The vehicle must be registered.
 - 11.1.4 The vehicle must be covered by Third Party Property insurance.
 - 11.1.5 All passengers in the vehicle must wear a seat belt.
 - 11.1.6 Child restraints must comply with the National Child Restraint Laws.
 - 11.1.7 Children that are 4-7 years old must not travel in the front seat of a vehicle that has two or more rows of seats, unless all the other back seats are occupied by children who are also under 7 years. They must use either a properly fastened and adjusted booster seat and be restrained with a properly fastened and adjusted lap-sash seatbelt or child safety harness.
 - 11.1.8 Children aged 7 years and older must use either a properly fastened and adjusted approved child restraint OR a seatbelt that is properly adjusted and fastened.
 - 11.1.9 Parents of those students travelling in the vehicle must provide written consent for their child(ren) to do so.
 - 11.1.10 The vehicle will be driven carefully, adhering to the legal speed limits and road laws at all times.
 - 11.1.11 Drivers must take children directly to and from arranged venues and not spontaneously detour or make additional arrangements without parental and/or the College Principal's consent.
- 11.2 No driver may provide transport if there is any possibility that he/she may be driving under the influence of illegal drugs or alcohol, or under any condition that would inhibit their ability to safely control a motor vehicle. It is the responsibility of the driver to inform senior or key leaders of any situation that may inhibit their ability to safely be in charge of a motor vehicle.
- 11.3 In the event of an accident in which any person is injured, the College Principal, staff members and parents must be informed as soon as possible.

- 11.4 All state legislations regarding the reporting of an accident must be followed.
- 11.5 It is not good practice for a staff member to transport a single student in their car. In the rare event that a staff member does need to do this, they should contact the College Principal to discuss the circumstances.
- 11.6 A copy of the Use of Private Motor Vehicles Policy (E7) is available.

Moral wellbeing

Policy B6

- 12.1 All media including television programmes, videos, music, magazines and/or displays shown or used as part of class activities should be suitable in content and age appropriate, with due regard to the values of Heritage College. Further to this, materials such as these should be used in accordance with the College Digital Media Policy.
- 12.2 Every staff member is expected to maintain a high moral code. Foul, demeaning, bullying, racist or sexist language is not acceptable and will not to be tolerated at Heritage College.

Responding to suspicious behaviours exhibited by staff members

- 13.1 *Any person who is concerned about the behaviour of any staff member must refer the matter to the College Principal. If the College Principal is implicated, then the Chair of the College Council must be informed.*
- 13.2 The Principal will consider communication needs with School Council and professional advice on how to manage this in line with procedural fairness will be sought from AISSA. There is a danger of defamation liability against the staff member if ultimately the allegation cannot be proved and so the allegations must be investigated in line with the professional advice.
- 13.3 Actions that may be appropriate could be stood down, suspension of access to school systems and IT records dependent on the situation.

Bullying

Policy F2

- 14.1 Heritage College will not tolerate any form of harassment, bullying or discrimination in the classroom, grounds, buses or at any College function or outing.
- 14.2 Teachers will:
 - 14.2.1 Instruct students on what constitutes harassment and bullying;
 - 14.2.2 encourage students to report all instances;
 - 14.2.3 counsel all students involved in bullying or harassment; and
 - 14.2.4 report incidents of bullying or harassment to the Principal.
- 14.3 *Anyone who believes that they or another person has been bullied or harassed is encouraged to raise the matter with any teacher, the Learning Support Leader or the Principal. Policies F2 and F7 provide further guidelines for handling such matters.*
- 14.4 Persistent harassment or bullying will result in action being taken by the Principal (which in serious cases, may include suspension or expulsion).

Strategies to minimise risk

- 15.1 Students will be advised through the Child Protection curriculum of what constitutes acceptable behaviour with respect to:
 - 15.1.1 their relationship with their parents;
 - 15.1.2 their relationship with other adults;
 - 15.1.3 student to student relationships;
 - 15.1.4 their relationship with strangers; and
 - 15.1.5 online relationships
- 15.2 Students will be told how to share any risks with students or adults.
- 15.3 Students will be asked for their input into perceived risks.
- 15.4 Parents will be advised that a Child Protection curriculum is taught and the school encourages a culture of proactive identifications of risks to the school and should reporting issues when concerns for children's safety are raised.

- 15.5 An “open door” policy should always be observed. Visual privacy should always be avoided.
- 15.6 A staff member is not to be left alone with a student for extended periods on a “one-to-one” basis. Where there is a perceived risk that a child might falsely allege inappropriate behaviour by a worker, a third person should be present.
- 15.7 The same prohibition is to apply to two students left alone.
- 15.8 The areas within the College grounds designated for students’ recreation are to be secure at all times within the school day to avoid intrusion and supervised to ensure good conduct.
- 15.9 Students should be instructed to advise of “intrusion” and of strange or unusual conduct in or near the College.
- 15.10 Staff and visitors to the school will wear appropriate name badges during school hours.
- 15.11 Visitors should be clearly identified, and the Visitor procedure maintained.
- 15.12 “Out of bounds” areas should be clearly identified and where possible secured and/or monitored.
- 15.13 Toilet areas are scheduled and checked by staff of the same gender through the school day along with random checks with staff signing off they were in that area.
- 15.14 Students who arrive after 8.55am are given a late card to indicate to the teacher that front desk have seen them on site and will mark their attendance.
- 15.15 Students with unauthorised absence after internal checks will have a text sent home to ask for an explanation for their absence that day. If none received then that will be followed up.
- 15.16 In line with the caring nature of the College, teaching staff and leadership will regularly consider the behaviour, welfare and needs of students in their care informally and formally as an agenda item at meetings. There will be consultation with leadership as necessary.

Student Well-being

Policy F11

- 16.1 *The College will appoint at least one Learning Support Leader as a first point of contact to provide advice and support to children, parents, employees and volunteers regarding the safety and well-being of children at the College.*
- 16.2 When funding is available, the College will provide a dedicated student wellbeing officer to support students who need extra support in dealing with difficulties impacting on their physical, cognitive, psycho-social and spiritual wellbeing. They will provide teachers and leaders relevant information that will enable staff to support the well-being needs of students whilst on school site. They will liaise with parents providing support and information to help their understanding of the well-being issue and to work collaboratively in harmony with the school for a consistent supportive approach to their child.
- 16.3 The well-being officer role is to be grounded in biblically based approaches to student wellbeing and counselling.
- 16.4 Where considered necessary and appropriate, students and their families will be referred to other outside professional well-being services.
- 16.5 A copy of the Student Well-being policy (F11) is available for staff.

Student behaviour management

Policy F9

- 17.1 Inappropriate sexual behaviour of students towards staff or other students may warrant a mandatory notification. Staff must consider the safety of other children and in consultation with the Principal develop and document a risk management plan (template located in Sentral) which will be communicated to all relevant parties.
- 17.2 *Staff members should advise the Principal immediately should a student or students seek an inappropriate relationship with a staff member, together with seeking assistance from their school leader and access services to actively manage the situation in a way that respects the emotional wellbeing of the student and provides support to the staff member.*
- 17.3 Regarding the management of student behaviour generally, a copy of the Student behaviour development policy (F9) is available for staff.

Recruitment and Screening practices

Policy D1

- 18.1 Heritage College will take all reasonable steps to ensure that it engages the most suitable and appropriate people to work with children. The following recruitment processes are in place:
- 18.1.1 All paid staff members and unpaid staff who volunteer regularly in an ongoing role of more than 7 days per calendar year, are involved in an overnight excursion or activity or have close personal contact with children with a disability, the recruitment process will include:
 - 18.1.1.1 personal interview, reference checks, and relevant screening. Reference checks and relevant screening will be completed prior to the appointment of all staff. During an induction, a copy of the Heritage College Child Protection Policy and Procedures Manual together with the Heritage College Code of Conduct will be provided to every paid and unpaid staff member who must also sign a written statement indicating they have read and will abide by these policies. Copies of signed statements are filed.
 - 18.1.2 All other volunteers, the recruitment process will include:
 - 18.1.2.1 a written application and relevant screening as outlined in paragraph 18.2. Relevant screening will be completed prior to the appointment of any volunteer. During an orientation, a copy of the Heritage College Child Protection Policy and Procedures Manual together with the Heritage College Code of Conduct will be provided to every volunteer who must also sign a written statement indicating they have read and will abide by these policies. Copies of signed statements are filed.
- 18.2 A major form of prevention relates to appropriate and stringent screening processes. A current registration will ensure that teachers are satisfactorily screened. All other staff and volunteers are required to obtain a Working with Children Check to be renewed every three years.
- 18.3 All contractors/tradespeople/third party providers engaged by the College who will be having contact with or working in close proximity to children, and will be having access to College records are required to present evidence of screening such as a Working with Children Check upon the delivery of such services to Heritage College. A copy of the Contract Management Policy is available from the Business Manager.
- 18.4 All contractors/tradespeople/third party providers engaged by the College who will not be having contact with or working in close proximity to children and will not have access to College records are not required to present evidence of screening to the College.
- 18.5 All staff are required to notify Heritage College if there is any change in their criminal history prior to the renewal date for their relevant screening/criminal history check.
- 18.6 A relevant history assessment register will be kept ensuring that records of relevant screening and criminal history checks are kept up to date by all staff.
- 18.7 Responsibility for register will be overseen by the Business Manager.
- 18.8 Criminal history information is dealt with in accordance with the Child safe environments Standards for dealing with information about a person's criminal history as part of a relevant history assessment, developed by the Government of South Australia Department for Education.
- 18.9 Child-related employment screening and Working with Children Checks are considered and subsequently approved, approved under certain conditions, or declined by the Principal. Applicants will be allowed the opportunity to discuss and request a review of the screening outcome if they do not agree with it. Procedural fairness will always be applied when assessing relevant screening and criminal history. Any decision made to exclude an applicant based on the screening outcome will be transparent, evidence-based, and documented. Heritage College will protect the privacy of all persons whose criminal history information is received by the College.
- 18.10 A copy of the Appointments Policy is available for staff.

- 19.1 All staff will have access to on-going training designed to enhance their development and understanding of child safety issues and assist them in carrying out their obligations under this policy. This training will include but not be limited to Responding to Abuse and Neglect Training. All staff will be required to update their training every 3 years.

Character reference requests

- 20.1 Where staff members who are seen to be a Heritage College representative are asked to provide a character reference for anyone charged with a criminal offence the College Council should be consulted. There can be severe consequences associated with the provision of references.

Use of school resources

- 21.1 Staff members hold positions of trust and leadership and are at all times prohibited from: sending, receiving, downloading, displaying, printing or otherwise disseminating material that is sexually explicit, obscene, profane, discriminating, fraudulent, offensive, defamatory or otherwise in any way unlawful.

Initiation/secret ceremonies

- 22.1 Initiations and or secret ceremonies are prohibited.

PART C: MISCELLANEOUS

Privacy

- 23.1 All information concerning students must be kept confidential and only disclosed to authorised persons. Procedures for storage of information concerning students associated with the College should be arranged with the Business Manager.

Staff member awareness

- 24.1 Staff should be aware that Section 166(4) of the CYPSPA protects staff members against civil and criminal liability for having reported suspected child abuse to CARL under Section 31 of the CYPSPA. Section 163(1) of the CYPSPA provides that the identity of a notifier to CARL is not to be disclosed without the consent of the notifier, or unless otherwise authorised by the Chief Executive under the Act, or in accordance with legal proceedings.
- 24.2 By Section 165 of the CYPSPA it is an offence to influence or attempt to influence a person who is obliged to report child abuse to CARL not to do so.
- 24.3 Apart from a report to CARL a staff member who informs another of suspected child abuse which cannot ultimately be proved can be liable for civil damages in defamation. Extreme care needs to be taken in making such an allegation to anyone other than CARL and the College Principal.
- 24.4 Other than for damages in defamation the Volunteers Protection Act 2001 relieves a voluntary staff member acting for the College from civil liability for any breach of duty provided they have acted in good faith and without recklessness.

Media Management

Policy E6

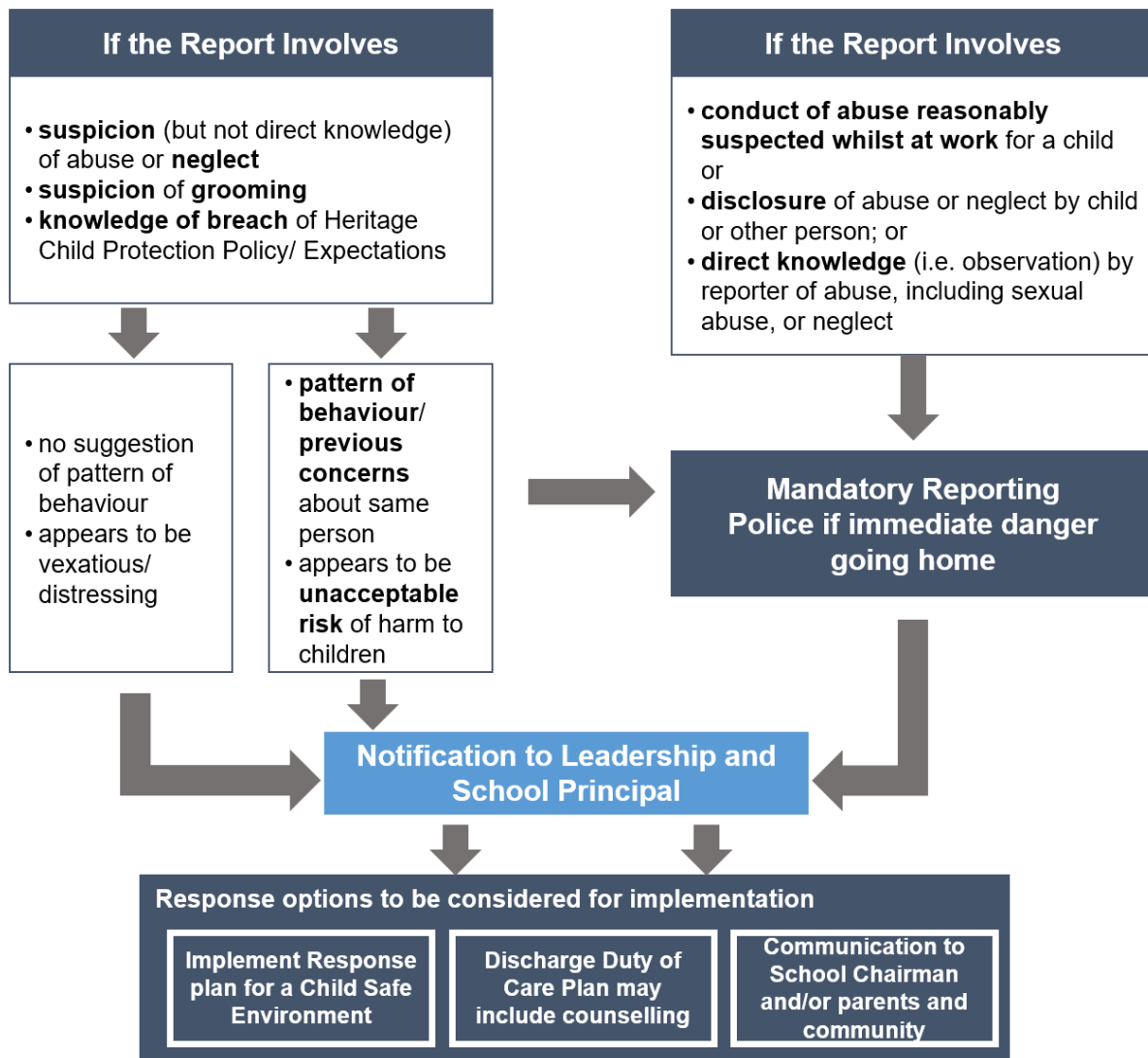
- 25.1 As a part of the Heritage College commitment to an open, accountable and professional responses, the persons authorised to make media comment concerning matters pertaining to alleged breaches of the Child Protection Policy are limited to the College Principal and the College Council Chair.
- 25.2 A copy of the Critical Incident Policy is available for staff.

Related Documents and Policies & Procedures

Child Protection Policy F3
Heritage College Code of Conduct
Policy B2: Camps & Excursions
Policy B6: Digital Media
Policy D2: Employment Conditions – Teaching Staff
Policy D6: Employment Conditions – Non-Teaching Staff
Policy F9: Student Behaviour Management
Policy E5: Volunteers
Policy E7: Use of Private Motor Vehicles
Policy F2: Bullying and Harassment
Policy F4: Duty of Care
Policy F7: Sexual Harassment
Policy F9: Student Behaviour Development
Policy F11: Student Well-being
Policy G2: Dispute Resolution
Appointments Policy
Contract Management Policy
Critical Incident Training Policy
Management of Bullying Incidents (Procedure for Teachers)
Visitor Procedure
Child Safe Environments: Principles of Good Practice, Department for Education
Child Safe Environments: Standards for dealing with information about a person's criminal history as part of a relevant history assessment, Department for Education
Mandatory Reporting Guide NCCD updated August 2018
Protective Practices Guidelines AISSA 2017

Appendix A - REPORTING FLOW CHART

The following chart should be used as a guide, with the specifics of the policy followed.



Appendix B - GROOMING

Grooming is actions by an adult, adolescent or child to develop opportunities to sexually offend against a child.

Grooming is generally subtle and is usually clearly seen in hindsight. This is why it is important that any breach of policy or generalised concern is reported – this will allow for seemingly minor matters to be linked to identify a pattern of behaviour which may lead to abuse being prevented or early detection.

There is no typical victim profile, but often vulnerable or lonely children are targeted as the abuser may aim to establish a relationship by filling an emotional need. Sometimes an abuser will offer to be a support for a family by offering to babysit, take a special interest in a child or develop an online relationship.

People do not need to make a judgement about behaviour they are observing. They do not need to have proof of abuse. Grooming is by nature ambiguous and Heritage College aims to create a culture where it is safe for people to take action wherever they observe behaviour that is a concern.

The following list is by no means exhaustive and the matters are not necessarily indicative that grooming is occurring. However, grooming may involve a person:

- positioning themselves in an environment where there is access to children such as sporting or community organisation
- developing relationships with a child, their family and sometimes within the organisation to gain trust from the community and individuals
- spending time with the child away from protective adults, for example, offering to babysit or take the child on special outings
- engaging inappropriately with the child on social media
- showing favouritism towards a child by giving gifts or money, or for older children, alcohol and drugs
- sharing secrets with the child
- allowing the child to break rules
- non-sexual touching of the child such as tickling, hugging, sitting on laps, rough play
- declarations of love for the child (to the child or to others).

These actions establish an emotional and physical connection which then allows escalation of behaviour to increase sexual elements, such as:

- interrupting a child while bathing or changing
- washing a child or allowing the child to be present while the adult is bathing or naked
- inappropriately talking about sex with the child
- 'accidental' intimate touching
- taking an inappropriate interest in the child's sexual development or knowledge
- exposing the child to pornography or sexual jokes
- sexual touching, sexual assault
- threats or rewards for keeping the abuse a secret – often the existence of the relationship between parents and the abuser or co-workers and the abuser means that the child is less likely to report.

Appendix C – SIGNS OF ABUSE OR NEGLECT

Signs that abuse is occurring could be very subtle. Understanding the nature of abuse and neglect, and the behaviours of abusers can assist in preventing or detecting abusive behaviour. Many small signs may be observed which may appear to be insignificant or ambiguous. However, when examined together these behaviours may demonstrate a pattern of behaviour that is indicative of abuse. This is why reporting any breaches of the Child Safe, Child Friendly Management Framework is critical.

Signs of abuse may include:

- unusually aggressive behaviour
- inappropriate sexualised behaviour
- sudden withdrawal
- being unusually frightened or worried
- not wanting to spend time with a person where this seems outside of the child's normal behaviour or where the child seems fearful or anxious
- unexplained bruises or injuries
- a feeling that "something isn't right"
- disclosure of abuse, even at a very low level, may be a sign that greater abuse is occurring and the child is 'testing' what might happen if they make a full disclosure.

Signs of neglect may include:

- frequent hunger
- lack of cleanliness that is ongoing and not consistent with the daily dirt accumulated by active children
- unwashed clothes.

A suspicion of abuse or neglect may be based on a direct observation of inappropriate behaviour or observations of minor incidents or signs of abuse which create a feeling of unease about an individual or situation. Such cases should be reported in accordance with this framework. Advice can be sought from line managers and the Principal.

The complexity of abuse

The nature of abuse and neglect is complex and sensitive. The child may be fearful that they will not be believed, that they, or someone they care about, will be hurt as retribution for the disclosure or that they have done something wrong. There are also complex legal and practical issues that could be involved, such as impact on the child's accommodation or contact with siblings and parents.

Trusted adults must pay attention to what a child says, and also what a child does not say. For example, a child may say that they do not want to be near a particular teacher, volunteer or another student. This could be indicative of the child feeling unsafe but the child might not wish to provide any further detail.

A child may indirectly disclose through drawings or play, or may make ambiguous statements to try to alert adults around them to the fact they are being abused.

If a child makes a disclosure, recipients of the information should be mindful of the need:

- for the child to feel safe and to be believed
- to ask open and not leading questions, for example, "What happened next?", instead of "Did he touch your penis?"
- to document the disclosure as soon as possible, using the words of the child where possible
- to follow reporting procedures.
- to involve police and other relevant authorities as soon as possible

There are many barriers to reporting abuse, with many people disclosing childhood abuse years later.

There are additional barriers for some children, for example, children with a disability may have trouble communicating, Aboriginal and Torres Strait Islander children may fear retribution and shame on the victim and perpetrator and be reluctant to involve police and authorities.

Children should be empowered by raising awareness of what abuse is and how they can get help and be supported by a culture of belief.