

# Child Safeguarding Policy ELC to Year 12



**LORETO  
COLLEGE**

**Marryatville, South Australia**

**[www.loreto.sa.edu.au](http://www.loreto.sa.edu.au)**

## Loreto Mission and Values

Mary Ward was an inspirational leader, believing passionately that 'women, in time to come, will do much' and that a strong education focused on girls and women would create 'seekers of truth and doers of justice'. All Loreto schools in Australia share the same set of values: freedom, justice, sincerity, verity and felicity. These values are at the heart of our educational philosophy; they shape our identity and how we interact with others through our words, thoughts and actions.

## Aim

At Loreto College we hold the care, safety and wellbeing of children and young people as a central and fundamental responsibility of our College.

The Loreto College Child Safeguarding Policy demonstrates the strong commitment of the College to child safety and establishing and maintaining child safe and child friendly environments, where children feel respected, valued and encouraged to reach their full potential.

Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors of Loreto College will act in a positive way to develop a safe environment for the children and young people in their care.

The Child Safeguarding Policy is published on our College's public website and provided to new Staff, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors prior to their engagement with the College and at induction.

## Policy Statement

Loreto College is committed to the safety and wellbeing of all children and young people at the College.

The College support the rights of the child and will act without hesitation to ensure a child safe environment is maintained at all times.

The College actively encourages all students and young people to openly express their views and feel comfortable about giving voice to the things that are important to them.

The College also supports the rights and wellbeing of our Employees, Volunteers and Direct Contact Contractors and encourage their active participation in creating and maintaining a secure environment for all members of the College community.

## Scope

This policy applies to all Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors working within, or for, Loreto College.

## Child Safe Values and Principles

The Child Safeguarding Policy provides the framework for:

- the development of work systems, practices, policies and procedures that promote child protection within the College;
- the creation of a positive and robust protection culture;
- the promotion and open discussion of child protection issues within the College;
- complying with all laws, regulations and standards relevant to child protection in South Australia.

Our policy complies with the Children and Young People (Safety) Act 2017, the Child Safety (Prohibited Persons) Act 2016 and aligns with the National Principles for Child Safe Organisations.

Loreto College's commitment to child protection is based on, and underpinned by, the following principles:

- (a) All children have the right to be safe and free from Child Harm or Risk of Harm and Grooming.
- (b) The welfare and best interests of the child are paramount.
- (c) The views and voice of the child must be respected.
- (d) The privacy of the child must be protected.
- (e) Clear expectations for appropriate behaviour with children are established in our Code of Conduct and our Protective practices for staff in their interactions with children and young people Guidelines for staff working or volunteering in education or care settings.
- (f) College employees and volunteers have a significant role in the prevention of child harm and risk of harm and grooming and are required to take responsibility for implementing Child Safeguarding practices.
- (g) Child safety awareness is promoted and openly discussed within our College community.
- (h) Procedures for reporting, and responding to, alleged or suspected incidents of Child Harm or Risk of Harm and Grooming are simple and accessible for all members of the College community.
- (i) The safety of children is dependent upon the existence of a child safe culture.
- (j) Procedures are in place to screen the Principal, Board members, members of the College Executive Leadership and Leadership, all staff, volunteers, direct contact contractors and external education and allied health providers who have direct contact with, or work in close proximity to, students on a regular basis.
- (k) Responding to Risks of Harm, Abuse and Neglect – Education and Care training is mandatory for all College Board members, Staff, Volunteers and Direct Contact Contractors.

- (l) Children who have any kind of disability have the right to special care and support.
- (m) Child protection goes beyond the face-to-face relationships and extends into the world of online behaviour and interactions.

## Related Documents

### Legislation

- Child Safety (Prohibited Persons) Act 2016
- Children and Young People (Safety) Act 2017

### External

### Standards/Conventions/Frameworks

- National Principles for Child Safe Organisations (2018)
- United Nations Convention of the Rights of the Child
- Royal Commission into Institutional Responses to Child Sexual Abuse
- Department for Education, Catholic Education South Australian and Association of Independent Schools of South Australia, *Protective practices for staff in their interactions with children and young people Guidelines for staff working or volunteering in education or care settings* (2019 update)
- Department for Education, Catholic Education South Australian and Association of Independent Schools of South Australia, *Responding to Problem Sexual Behaviour in Children and Young People: Guidelines for staff in education and care settings* (3<sup>rd</sup> edition, revised 2019)
- Department for Education, Catholic Education South Australian and Association of Independent Schools of South Australia, *Managing allegations of sexual misconduct in SA education and care settings* (2019)
- Catholic Archdiocese of Adelaide, *Safeguarding Children and Young People Policy* (2023)
- SACCS, *Reporting Harm of Children and Young People Procedure* (2021)
- Loreto College *Reporting Harm of Children and Young People Procedure*

## Definitions

In this policy context, the following definitions apply:

**Bullying** is repeated verbal, physical or social behaviour that is harmful and involves the misuse of power by an individual or group towards one or more persons and includes cyber-bullying.

**Child** means

- a person under 18 years of age;
- a child or a young person enrolled as a student at the College

**Child Harm or Risk of Harm** is any serious omission or commission by a person which jeopardises or impairs a child's psychological, intellectual or physical development. Child Harm or Risk of Harm is characterised by the failure to provide for the child's basic needs.

Behaviours may include:

- inadequate care and supervision of young children for long periods of time
- failure to provide adequate nutrition, clothing or personal hygiene
- failure to provide necessary health care/medical treatment
- disregard for potential hazards in the home
- forcing the child to leave home at an early age
- allowing children to engage in chronic truancy.

**Child Physical Harm or Risk of Harm** is any non-accidental act inflicted upon a child which results in physical injury to the child. Physical harm results from practices such as:

- hitting, punching, kicking (indicators: marks from belt buckles, irons, fingers, cigarettes)
- shaking (particularly young babies)
- burning, biting, pulling out hair
- alcohol or other drug administration.

**Child Emotional Harm or Risk of Harm** is a chronic attitude or behaviour directed at a child whereby a child's self-esteem and social competence is undermined or eroded over time or the creation of an emotional environment which is detrimental to or impairs the child's psychological and/or physical development.

Behaviours may include:

- bullying
- devaluing
- ignoring
- rejecting
- corrupting
- isolating
- terrorising
- family violence

**Child Sexual Harm or Risk of Harm** is any sexual behaviour imposed on a child. The child concerned to be unable to alter and/or understand the perpetrator's behaviour due to his or her early stage of development and/or powerless in the situation. Sexual harm or risk of harm occurs when someone in a position of power to the child uses her/his power to involve the child in sexual activity.

Behaviours can include:

- sexual suggestion
- exhibitionism, mutual masturbation, oral sex
- showing pornographic material eg DVDs, Internet
- using children in the production of pornographic material
- penile or other penetration of the genital or anal region
- child prostitution

**Cyber-bullying** uses e-technology as a means of bullying others. It is the use of an internet service or mobile technologies – such as email, chat room, discussion groups, instant messaging, web pages or SMS (text messaging) – with the intention of harming another

person. Examples include communications that seek to intimidate, control, manipulate, put down or humiliate the recipient.

**Direct contact volunteers** are those volunteers who 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 camps and excursions, coaching sporting teams or assisting in learning activities.

**Direct contact contractors** are third party contractors who have direct unsupervised contact with students during the normal course of their work or contractors who may be in a position to establish a relationship of trust with a student. Examples of direct contact contractor activities may include music tutors, sport coaches, allied health providers and casual teachers.

**Duty of Care** is a common law concept that refers to the responsibility of employees and volunteers to provide children with an adequate level of protection against harm or risk of harm. It is usually expressed as a duty to take reasonable care to protect children from all reasonably foreseeable risk of harm. The question of what constitutes reasonable care in any given case will be determined objectively by a court and will depend on the individual circumstances of each case. In their relationships with children, employees and volunteers are required to ensure that the physical and emotional welfare of students is safeguarded, and that their own behaviour with children is always regulated by this duty of care.

**Employee** means a person employed for remuneration under a contract of employment and includes temporary relief teachers.

**External Allied Health Provider** means any person and/or organization that parents have engaged, and the College approves, to provide allied health services to a child or young person on site at the College.

**External Education Provider** means any organization that the College has engaged to deliver a specified course that is part of the broader curriculum, to children whether on- site at the College or at external premises.

**Grooming** describes the process whereby an employee, volunteer, third party contractor or external education provider builds a relationship with a child with a view to harming them at some stage. Amongst other things, it may include, but is not limited to:

- the child being given special attention;
- development of any 'special' relationships with children that could be seen as favouritism; or
- forming special relationships with parents of the child.

**Harm or Risk of Harm** means Child Harm or Risk of Harm, Grooming, Bullying or other detrimental effect of a significant nature on a child's physical or psychological or emotional wellbeing.

**Responding to Abuse and Neglect Training** means whichever of the following courses that the Principal, in their discretion, considers to be appropriate, having regard to the nature of the employee's, volunteer's or direct contact contractor's involvement at the College:

- *Responding to Risks of Harm, Abuse and Neglect – Education and Care* training (Fundamentals and Masterclass)
- Other equivalent courses as may be available from time to time

**Risk**, in the context of safeguarding children, is the likelihood of anything occurring that can cause harm to a child.

**Risk assessment** in the context of safeguarding children refers to a process of evaluating the information received to reach a decision about the risk of harm a person may pose to children.

**Risk management** is identifying and assessing all potential sources of harm, and taking steps to decrease the likelihood that harm will occur.

**Risk of harm** is the likelihood of inflicting harm to children (either directly or as a consequence of other actions) and the severity of that harm.

**Screening** involves obtaining information about potential employees and volunteers to minimize the risk of harm. This process typically involves reference checks, verification of qualifications and experience and obtaining a current, not prohibited Working with Children Check after which a decision-making process eventuates concerning the acceptance or exclusion of persons in roles at, or engagement by, the College.

**Volunteers** are those volunteers who 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 volunteers may include people volunteering in excursions, coaching sporting teams or assisting in learning activities.

**Volunteering** means an activity which is of benefit to the community, is done of one's free will and is undertaken without monetary reward or for an honorarium. For example, sporting coaches may receive an honorarium, but would be considered volunteers for the purposes of this policy. For the purpose of this policy, visiting clergy or religious are considered volunteers.

**Working with Children Check** means people working or volunteering with children in South Australia who must, by law, have a current, not prohibited Working with Children Check. A Working with Children Check is an assessment of whether a person poses an unacceptable risk to children. As part of the process, the Screening Unit will look at criminal history, child protection information and other information.

## Communication

This child safe policy and related documents are available on the Loreto College website, Loreto Connect portal and also on request.

This child safe policy and related documents are provided to all workers as part of their induction following recruitment.

We encourage and respect the views of children and young people and involve them in decision making as appropriate. We provide clear age-appropriate or developmentally appropriate explanations to children and young people including their right to safety, their right to be listened to and that they can provide feedback or make a complaint if they have a concern, to any worker or ask their parent/guardian to do this on their behalf. We will listen to and act upon any complaints or concerns that a child or young person raises with us.

## Student Safety and Participation

At Loreto College, we actively encourage all students and young people to openly express their views and feel comfortable about giving voice to the things that are important to them.

We actively seek to include students in decisions that affect them. We ensure students know about their rights to safety, information and participation.

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 or carers, raise with us.

The College has developed the SEAD (Social, Emotional and Academic Development) Program which is aimed at facilitating girls' understanding of themselves as learners, responsible citizens and as positive friends.

If students feel unsafe or have concerns, or their parents or carers have concerns, information is available:

- through the College intranet, Loreto Connect on the SEAD landing button;
- flyers on Loreto Connect outlining what students can do if they feel unsafe; and
- grievance guidelines for students.

## Child Protection Program

The safety of children and young people is Loreto College's paramount obligation and must not be overridden by other interests.

The following Child Protection Program relates to all aspects of protecting children from harm or risk of harm and grooming and establishes work systems, practices, policies and procedures to protect children from harm or risk of harm. It includes:

- clear information as to what constitutes harm or risk of harm and associated key risk indicators;
- clear procedures for responding to and reporting allegations of child harm or risk of harm;
- strategies to support, encourage and enable staff, volunteers, direct contact contractors, external educator and allied health providers, parents/guardians and students to understand, identify, discuss child protection matters;
- strategies to support, encourage and enable staff to undertake good practice with pre- school age (birth to 5 years of age) children;
- procedures for recruiting and screening College Board members, staff, direct contact volunteers and direct contact contractors;
- wellbeing strategies designed to empower students and keep them safe;
- policies with respect to cultural diversity and students with disabilities;
- child protection training program;
- guidelines with respect to record keeping and confidentiality;
- child safety matters as an agenda item for all Leadership and Board meetings;



- Board reports to have updates on the implementation of child protection practices;
- policies to ensure compliance with all relevant laws, regulations and standards (including the requirements for a child safe environment); and
- a system for continuous improvement and review.

| Child Protection Program Initiatives  | What it means   |
|---|---|
| Clear information as to what constitutes child harm or risk of harm and associated key risk indicators;   | <ul style="list-style-type: none"> <li>• definitions outlined in Child Safeguarding Policy</li> <li>• key risk indicators outlined in Child Safeguarding Policy as examples of behaviour</li> </ul>   |
| Clear procedures for responding to and reporting allegations of child harm or risk of harm;   | <ul style="list-style-type: none"> <li>• Child Safeguarding Policy identifies person(s) to report allegations of child harm or risk of harm</li> <li>• Responding to Risks of Harm, Abuse and Neglect – Education and Care training is undertaken by all staff, volunteers and direct contact contractors</li> <li>•</li> </ul>   |
| Strategies to support, encourage and enable staff, volunteers, direct contact contractors, external educator allied health providers, parents/guardians and students to understand, identify, discuss child protection matters; | <ul style="list-style-type: none"> <li>• update on Child Safeguarding Policy and Child Safety Code of Conduct conducted annually for staff</li> <li>• volunteers updated on Child Safeguarding Policy annually</li> <li>• direct contact contractors and external education and allied health providers are informed with the College's Child Safeguarding Policy and child protection program</li> <li>• child protection topics form part of the SEAD (Social, Emotional and Academic Development) program for students. This will include wellbeing resources and contacts for support for students and parents via the Loreto Connect SEAD program</li> <li>• information to parents and guardians is available via Loreto Connect about the Child Safeguarding Policy and Child Safety Code of Conduct expectations of all staff, volunteers, third party contractor and external educator providers.</li> </ul> |

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| <p>Strategies to support, encourage and enable staff to undertake good practice with pre-school age (birth to 5 years of age) children;</p>                                | <ul style="list-style-type: none"> <li>• when children indicate they want comfort, ensure that it is provided in a public setting and that it is in keeping with the guidelines provided</li> <li>• signs of discomfort in children such as stiffening, pulling away or walking away must be respected. In these situations, the child must continue to be observed/monitored until his/her distress is managed</li> <li>• children must not be left in states of high distress for long periods. Parents need to be contacted under these circumstances</li> <li>• staff should follow the site's toileting and nappy changing policy and individual toileting plans where these have been documented with parents.</li> </ul> |
| <p>Procedures for recruiting and screening College Board members, staff, pre-service teachers and educators, direct contact volunteers and direct contact contractors;</p> | <ul style="list-style-type: none"> <li>• all board members, staff, pre-service teachers and educators, direct contact volunteers and direct contact contractors to hold a current, not prohibited, Working with Children Check</li> <li>• all Board members, staff, pre-service teachers and educators, direct contact volunteers and direct contact contractors undergo an internal electronic applicant screening</li> </ul>  |
|  | <ul style="list-style-type: none"> <li>• applicants for employment complete a CESA Employment Declaration form, seeking information about any charges or convictions of any criminal offence or of any conduct which would reasonably be considered by the College to render the applicant unsuitable for employment in the College</li> <li>• volunteers and direct contact contractors complete a CESA Volunteer Declaration form, seeking information about any charges or convictions of any criminal offence or of any conduct which would reasonably be considered by the College to render the applicant unsuitable for engagement at the College</li> </ul>   |
| <p>Wellbeing strategies designed to empower students and keep them safe;</p>   | <ul style="list-style-type: none"> <li>• wellbeing strategies actively taught as part of the SEAD (Social, Emotional and Academic Development) program for students</li> <li>• wellbeing resources available to students and parents via Loreto Connect SEAD program</li> <li>• direct student access to school and external support, eg Lead Psychologist and College Psychologist, Kids Help Line, Youth</li> </ul>   |

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|  | Help Line, Reachout, Youth Beyond Blue and Headspace   |
| Policies with respect to cultural diversity and students with disabilities;        | <ul style="list-style-type: none"> <li>• a Student Diversity Policy ensures child protection matters are evident</li> </ul>  |
| Child protection training program;   | <ul style="list-style-type: none"> <li>• College Executive outline the Child Safeguarding Policy, Child Safety Reporting and the Safeguarding Children and Young People Code of Conduct on an annual basis. This will also occur at the time of employment. Contract staff and pre-service teachers and educators will be asked to attend specific meetings to receive this training.</li> <li>• staff sign the Safeguarding Children and Young People Code of Conduct document that they have received training in the details of this policy</li> <li>• volunteers, pre service teachers and educators, education and allied health care providers sign the Safeguarding Children and Young People Code of Conduct document that they have received, read and agree to the Child Safeguarding Policy</li> <li>• all staff undertake the Responding to Risks of Harm, Abuse and Neglect – Education and Care training updates every three years</li> <li>• Board members sign the Safeguarding Children and Young People Code of Conduct</li> <li>• a designated person can be contacted for advice or support</li> <li>• Employee Assistance Program (EAP) is available</li> </ul> |
| Guidelines with respect to record keeping and confidentiality;                     | <ul style="list-style-type: none"> <li>• confidential records are kept of the following: <ul style="list-style-type: none"> <li>- staff and volunteer training</li> <li>- WWCC and Employment Declaration Forms</li> <li>- reports of any child protection matters and associated documentation</li> </ul> </li> </ul>   |
| Child safety matters as an agenda item for all Leadership and Board meetings;      | <ul style="list-style-type: none"> <li>• all Leadership and Board agendas include child safety matters as an item for discussion</li> </ul>  |
| Board reports to have updates on the implementation of child protection practices; | <ul style="list-style-type: none"> <li>• Executive Director: HR, Risk and Compliance provides monthly updates on the implementation of child protection practices</li> </ul>   |

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| Policies to ensure compliance with all relevant laws, regulations and standards (including the requirements for a child safe environment); | <ul style="list-style-type: none"> <li>Executive Director: HR, Risk and Compliance to ensure compliance is met</li> </ul>  |
| A system for continuous improvement and review   | <ul style="list-style-type: none"> <li>College utilises a risk management strategy that identifies, assesses and takes steps to minimise the risks of harm to children</li> <li>the Child Safeguarding Policy and Safeguarding Children and Young People Code of Conduct is reviewed annually</li> </ul> |

## Responsibilities

Child protection is the responsibility of everyone employed or volunteering at Loreto College. All members of the College Board, staff, pre service teachers and educators, volunteers, direct contact contractors and external education and allied health providers have a shared responsibility for contributing to the safety and protection of children. It is each individual's responsibility to be aware of key indicators of harm and risk of harm, and to be observant and to raise any concerns they may have relating to any of these with a member of the Executive Leadership. Specific responsibilities include:

### **College Board will:**

- (a) ensure that appropriate resources are made available to allow the College's Child Safeguarding Policy and Child Protection Program to be effectively implemented within the College;
- (b) hold the Principal and Executive Leadership accountable for the effective implementation of this Policy and the Child Protection Program.

### **Executive Leadership will:**

- (a) be accountable for, taking all practical measures to ensure that the Child Safeguarding Policy and the College's Child Protection Program are implemented effectively;
- (b) actively promote a strong and sustainable child safety and child protection culture within the College and be accountable for ensuring all Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors carry out their work in accordance with the Child Protection Program;
- (c) ensure appropriate screening processes operate in respect of all Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors;
- (d) ensure that access to appropriate training and development is available to all Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors;
- (e) ensure that direct contact contractors and external education and allied health providers are aware of, and compliant with, those elements of the Child Protection Program as apply to them under the terms of their contract or

engagement, including by incorporating the terms of the Child Protection Program into contracts, where appropriate.

**Employees and volunteers will, as a condition of employment or volunteering at the College:**

- comply with our Child Protection Program and their legal obligations with respect to reporting of child harm or risk of harm. This is achieved by:
  - (a) creating an environment for children and young people to be safe and to feel safe;
  - (b) upholding high principles and standards for all staff, volunteers and direct contact contractors and external education and allied health providers;
  - (c) promoting models of behaviour between adults and children and young people based on mutual respect and consideration;
  - (d) 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;
  - (e) 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 harmed or at risk of harm;
  - (f) providing a physically and psychologically safe environment where the wellbeing of children and young people is nurtured;
  - (g) 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;
  - (h) 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 harm or risk of harm;

It is each individual's responsibility to be aware of key risk indicators of child harm or risk of harm and grooming, to be observant and to raise any concerns they may have relating to child harm or risk of harm and grooming with a member of College Executive Leadership and/or Senior Leadership.

Staff, as a condition of employment at the College, must adhere to the College's Child Safeguarding Policy and Child Protection Program and to the *Protective practices for staff in their interactions with children and young people Guidelines for staff working or volunteering in education or care settings* (2019 update).

**Volunteers will:**

- (a) comply with our Child Safeguarding Policy and Safeguarding Children and Young People Code of Conduct, as defined in this Policy;
- (b) be required to hold a current, not prohibited, Working with Children Check;

- (c) understand their legal obligations with respect to the reporting of harm or risk of harm to children and young people. This applies to both direct contact volunteers and indirect contact volunteers. Examples of indirect contact volunteer activities may include assisting with College functions and fundraising events;
- (d) be aware that it is each individual's responsibility to be aware of key risk indicators of harm or risk of harm to children and young people, to be observant and to seek support from the Executive Leadership and/or Senior Leadership.

**Direct Contact Contractors will:**

- (a) be responsible for contributing to the safety and protection of students in the College environment;
- (b) be required to comply with the College's Child Safeguarding Policy and Safeguarding Children and Young People Code of Conduct;
- (c) hold a current, not prohibited, Working with Children Check;
- (d) understand their legal obligations with respect to reporting of child harm or risk of harm to children and young people and grooming;
- (e) be required to understand their legal obligations with respect to reporting of harm or risk of harm to children and young people;
- (f) be aware that this may be an included requirement in the written agreement between the College and the contractor;
- (g) direct contact contractors include consultants, casual teachers, music tutors and sport coaches,;

**External Education Providers and External Allied Health Providers:**

- (a) an external education provider is any organisation that the College has arranged to deliver a specified course of study that is part of the broader curriculum, to students enrolled at the College;
- (b) the delivery of a course by an external education provider may take place on the College premises or at external premises;
- (c) an external allied health provider is any organisation that the College has arranged to deliver allied health services to children and students enrolled at the College;
- (d) the delivery of allied health services by an external allied health provider takes place on the College premises;
- (e) all external education and allied health providers engaged by the College are responsible for contributing to the safety and protection of children in the College environment;
- (h) all external education and allied health providers engaged by the College are required to comply with the College's Child Safeguarding Policy and Safeguarding Children and Young People Code of Conduct with respect to reporting harm or risk

of harm to children and young people and grooming at the College;

- (i) hold a current, not prohibited, Working with Children Check;
- (f) each external education or allied health providers engaged by the College is required to lodge a child safe environments compliance statement as required by the Child Safety (Prohibited Persons) Act 2016.

## Reporting and Responding to Harm or Risk of Harm

- (a) The College takes all allegations or disclosures of suspicions that a child or young person is or may be at risk of harm seriously, and responds to such allegations and disclosures promptly, sensitively and thoroughly.
- (b) If College staff believe a child or young person at the College is at immediate risk of harm, they must phone SA Police on 000.
- (c) Refer to the Reporting Harm of Children and Young People Procedure for process to follow.

## Reporting and Responding to General Complaints and Feedback

- Students can raise child safety incidents or concerns through the *Grievance Procedures for Students*
- Other general grievances which may be raised by children and young people, staff or other members of the College community, by referring to the *Grievance Procedures and Guidelines for Parents and Community Members* (available on the College website)

## Safe Employment Practices

Loreto College is committed to ensuring that the safety and wellbeing of children and young people is dependent on a student safe culture existing at the College. Establishing that culture requires effective staff recruitment, supervision and management practices.

- (a) All positions at the College that involve worked connected to children and young people will have a role description which clearly sets out:
  - the position requirements, duties and responsibilities regarding children and young people safety and wellbeing;
  - the applicant's essential or relevant qualifications, experience and/or attributes in relation to education and children and young people safety and wellbeing;
  - the College's ethos, values and commitment in respect to children and young people safety and wellbeing.
- (b) The safety and wellbeing of children and young people is of utmost importance during the recruitment process. All Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors working with children and young people must be suitable and share

Loreto College's values and commitment to student safety and wellbeing.

- (c) The College assesses the suitability of Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors to undertake work connected to children and young people through screening, qualification verification, interviews, work history checks and referee checks.
- (d) All prospective and existing staff will be informed of and required to comply with the College's children and young people safety and wellbeing practices (including not limited to this Policy, the College's and individual staff member's record keeping, information sharing and reporting obligations), and be subject to children and young people safety screening in accordance with the College's obligations under legislation (including the *Child Safety (Prohibited Persons) Act 2016* (SA)).
- (e) The College requires that Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors act professionally, and in a way that embodies the College's public commitment to children and young people safety and wellbeing whilst at the College. The *CESA Code of Conduct* provides guidelines for Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors on expected behavioural standards and responsibilities and set out examples of appropriate and inappropriate behaviours. The College will take appropriate disciplinary action where an Employee, Pre-service Teacher and Educator, Volunteer, Education and Allied Health Provider and Direct Contact Contractor is found to have acted contrary to the Code of Conduct, or any other College policies and procedures regarding appropriate standards of behaviour.
- (f) The *CESA Code of Conduct* is provided as part of the employment package and part of the formal induction at the College. The *CESA Code of Conduct* is available on Loreto Connect (internal network).
- (g) All applicants for prescribed positions will be screened for their suitability for employment purposes. The screening will involve the verification of Department of Human Services (DHS), current, not prohibited WWCCs, Catholic Education South Australia electronic screening, interview, referee checks, Responding to Risks of Harm, Abuse and Neglect – Education and Care (RRHAN- EC) accreditation on commencement and refresher training every 3 years after, checking qualifications and previous employment history in working with children and young people.
- (h) The College is registered with the DHS Screening Unit and all WWCCs for all successful applicants are linked to the DHS Screening Unit. The accuracy of all WWCCs are verified with the DHS Screening Unit portal, as required by law.
- (i) The College will maintain a Working with Children Check Register and ensure that all Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors renew their WWCC every 5 years.
- (j) The College will ensure that the Department of Human Services Screening Unit is immediately contacted when the College is made aware of certain information regarding any person involved with the College, including any serious criminal offence, child protection information or disciplinary or misconduct information.



- (k) The College will ensure that all applicants complete an Employment Declaration form seeking information about any charges or convictions of any criminal offence or of any conduct which would reasonably be considered by the College to render the applicant unsuitable for employment at the College.
- (l) Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors will be subject to regular supervision, training and periodic children and young people safety checks to ensure their ongoing suitability for work connected with children and young people
- (m) At least annually, the College will ensure that appropriate guidance and training is provided to relevant Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors engaged in work connected with children and young people about:
  - individual and collective obligations and responsibilities for managing the risk of harm to children and young people;
  - relevant risks in the College environment (including the online environment);
  - the College's strategies for managing risks.
- (n) All Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health Providers and Direct Contact Contractors are required to read and sign the Child Safeguarding Policy and Safeguarding Children and Young People Code of Conduct.

## Risk Management

- (a) Loreto College is committed to proactively and systematically identifying and assessing potential sources of harm to student safety across our whole school environment and takes proactive actions to ensure the likelihood of harm is decreased.
- (b) The College will 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.
- (c) Loreto College has nominated the person responsible for the process to be the Executive Director: HR, Risk and Compliance.

## Policy and Program Review

Loreto College is committed to the continuous improvement of our Child Safeguarding Program. The Program is regularly reviewed for overall effectiveness and to ensure compliance with all child protection related laws, regulations and standards.

Loreto College is committed to actively seeking, actioning and incorporating into the Child Safeguarding Policy feedback from students, families and the wider College community, Employees, Pre-service Teachers and Educators, Volunteers, Education and Allied Health

Providers and Direct Contact Contractors, and will communicate any adjustments or amendments widely throughout the College community.

We will, at a minimum, review this policy and the related procedures once every 5 years as required by the Children and Young People (Safety) Act 2017. We will also review this policy when:

- new or added risks are identified for children or young people, which may require a change in the policy or procedures
- a critical incident where a child or young person has experienced harm through involvement in the organisation
- concerns are raised by anyone involved in your organisation about child safety or welfare in the organisation
- awareness or compliance to the child safe policy and/or procedures is low
- legislative changes/requirements.

We will lodge a new child safe environments compliance statement with the Department of Human Services each time we review and update this policy.

## Document Control

|                              |   |
|------------------------------|---|
| <b>Policy Title</b>          | Child Safeguarding Policy ELC – Year 12 |
| <b>Ratified by Executive</b> | 2018                                    |
| <b>Policy due for review</b> | 2025                                    |

## Appendix 1

### Safeguarding Children and Young People Code of Conduct

#### 1. Purpose

At Loreto College Marryatville we hold the care, safety and wellbeing of children and young people as a central and fundamental responsibility of our College. The College has established strategies, practices, policies and procedures to uphold its public commitment to student safety and wellbeing. The College supports a proactive role in the care, wellbeing and protection of children and young people, the provision of child safe environments and intervention procedures for responding to harm and risks of harm.

#### 2. Statement

Loreto College takes a zero-tolerance approach to any behaviours that jeopardise student safety and wellbeing: this includes not only child harm or risk of harm and grooming, but any type of behaviour by a staff member that crosses professional boundaries with a student.

The Safeguarding Children and Young People Code of Conduct provides a high-level statement of professional boundaries, ethical behaviours, along with acceptable and unacceptable behaviours. The focus is on safeguarding children and young people and reflects that children and young people deserve, as a fundamental right, safety and protection from all forms of harm or risk of harm.

#### 3. Scope

Loreto College places the highest priority on the care, wellbeing and protection of children and young people and it is the shared responsibility of everyone employed or volunteering at Loreto College.

For the purpose of this document, the Safeguarding Children and Young People Code of Conduct, the term 'staff' refers to the following people: teaching and non-teaching staff, members of the College Board, parent/caregiver volunteers, tutors, clergy/religious, pre-service teachers on placement, educators on placement, third party contractors, external education and allied health care providers and visitors to the College.

#### 4. Responsibilities

##### Acceptable Behaviours

- (a) adhere to the College's Safeguarding Children's Policy and all policy and procedures to do with Child Protection and Student Wellbeing;

- (b) take all reasonable steps to protect children and young people from harm or risks of harm;
- (c) behave as positive role models to all students and children;
- (d) promote models of behaviour between adults and children and young people based on mutual respect and consideration;
- (e) listen and respond to the views and concerns of children and young people, particularly if they are telling you that they or another child has been harmed or is at risk of harm, or that they are worried about their safety/the safety of another child;
- (f) provide a physically and psychologically safe environment where the dignity, equity, respect and wellbeing of all children and young people, including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs, is nurtured and upheld;
- (g) promote the cultural safety, participation and empowerment of all students, inclusive of all abilities, genders, sexual orientation and religious and cultural backgrounds;
- (h) demonstrate appropriate personal and professional boundaries;
- (i) act with propriety, provide a duty of care and protect children and young people in your care;
- (j) assist 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 harm or risk of harm;
- (k) teach children and young people skills and assist them to develop an understanding which will empower them to achieve and maintain personal safety and wellbeing;
- (l) ensure, where practicable, meetings with an individual student or small groups of children or young people occur in the College meeting rooms, open spaces or classrooms with clear visibility. In this context, conversations need to be focussed on the educational and wellbeing needs of the child or young person;
- (m) follow the legislative and internal College processes by notifying the Child Abuse Report Line on 13 14 78 or make an online report if, in the course of your work, you suspect on reasonable grounds that a child or young person has been harmed or is at risk of harm;
- (n) report any breaches of this Code of Conduct or child safety concerns to the College Principal or College Executive Leadership Team;
- (o) call the Police on 000 if you have concerns that a child or young person is in immediate danger;
- (p) ensure appropriate confidentiality of information concerning children and

young people and respect the privacy of students and their families, only disclosing information to the necessary people who have a need to know;

- (q) refrain from negativity, gossip, spreading rumours or making inappropriate comments about children and young people through any form of communication, including electronic communication

### **Unacceptable Behaviours**

- (a) engage in any unlawful activity with or in relation to a child;
- (b) engage in any activity that is likely to physically, sexually or emotionally harm a child or young person;
- (c) engage in conduct that shows, or that can be interpreted as showing, a personal rather than a professional interest in a child or young person;
- (d) encourage, develop or maintain any 'special' relationships with children or young person that could be seen as favouritism, (for example, giving gifts or other benefits (whether monetary or non-monetary) to children and young persons;
- (e) hold conversations with a student of an intimately personal nature, for example where they disclose information about themselves, without a valid professional context (eg counselling);
- (f) invite children or young persons to their home or visit children or young persons at their home;
- (g) attend parties or socialise with children or young persons;
- (h) unlawfully discriminate against any child or young person or their family members based on age, gender, race, culture, vulnerability, sexual orientation, ethnicity or disability;
- (i) be alone for extended periods of time with a child or young person unnecessarily, where the focus is not on their academic or wellbeing needs;
- (j) arrange personal contact or engage in, inappropriate personal communication, including any electronic online medium, with children or young persons for a purpose unrelated to Loreto College sanctioned activities;
- (k) disclose, publish or upload personal or sensitive information about a child or young person, including still/moving images, documents or audio recordings of a child or young person to any location, without parental permission or the permission of the College Principal;
- (l) create or use private online chat groups with children and young people;
- (m) use inappropriate language in the presence of children and young people or show or provide children or young people access to inappropriate images or material;

- (n) work with children and young people whilst under the influence of alcohol or prohibited drugs;

Breaches or suspected breaches of the Code of Conduct should be reported as soon as practicable to Leadership either in person, by telephone on 08 83344200, or via email at [principal@loreto.sa.edu.au](mailto:principal@loreto.sa.edu.au) or [anna.fitzpatrick@loreto.sa.edu.au](mailto:anna.fitzpatrick@loreto.sa.edu.au).

### Non-Compliance with the Child Safeguarding Policy

Loreto College enforces the Child Safeguarding Policy and the Safeguarding Children and Young People Code of Conduct. In the event of any non-compliance, the College will instigate a review that may result in a range of measures including (depending on the severity of the breach):

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

# Safeguarding Children and Young People

## Code of Conduct

I,.....confirm that  
I have:

Name

- been made aware that Loreto College Marryatville is committed to child protection;
- been made aware of my responsibilities and obligations in relation to child protection;
- read and understood the Loreto College Child Safeguarding Policy and Safeguarding Children and Young People Code of Conduct and commit to its implementation.

.....

Signature

.....

Date