

# IGNATIUS LEARNING CENTRE CHILD SAFETY POLICY

## 1. PRINCIPLES

The principles that underpin this policy include:

- the ILC is committed to ensuring the care, safety, and wellbeing of all children
- clear strategies and procedures are necessary to keep students safe from harm, including all forms of abuse in our school environment
- the ILC has zero tolerance for child abuse
- the ILC is committed to promoting child safety, children's wellbeing and protecting children from abuse
- when creating a child safe environment, the ILC takes into account the needs of all children, including Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disabilities, and children who are vulnerable

## 2. PROCEDURE

### 2.1 Statement of Commitment

The ILC is committed to providing a child safe environment where children and young people are safe and feel safe, their voices are promoted and they are heard about decisions that affect their lives. The ILC is committed to acting in children's best interests and keeping them safe from harm. We regard our child protection responsibilities with the utmost importance. All allegations and safety concerns will be treated seriously and consistently in accordance with our robust policies and procedures. We commit to providing the necessary resources to ensure compliance with all relevant child safety and child protection laws and regulations and maintain a child safe culture.

#### **The ILC has zero tolerance for child abuse.**

All members of the school community will be given the Child Safety Code of Conduct and have it explained to them in appropriate language so that they are aware of what is **acceptable and unacceptable behaviour** with respect to child safety and child abuse.

### 2.2 Child Safe Standards

The ILC actively promotes the safety and wellbeing of all students and all school staff are committed to protecting students from abuse or harm in the school environment, in accordance with our legal obligations under Ministerial Order No.870 – Child Safe Standards – Managing the risk of child abuse in schools.

Within the framework of this Policy is an adherence to the Victorian Child Safe Standards and the Principle of Inclusion as follows:

1. Strategies to embed an organisational culture of child safety
2. A child safe Policy or statement of commitment to child safety
3. A child safety code of conduct
4. Screening, supervision, and training and other human resources practices that reduce the risk of child abuse
5. Procedures for responding to and reporting suspected child abuse
6. Strategies to reduce or remove risks of child abuse
7. Strategies to promote child participation and empowerment

### **2.3 Overarching values and principles**

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

- all children have the right to be safe
- the welfare and best interests of the child are paramount
- the views of the child and a child's privacy and dignity must be respected
- clear expectations for appropriate behaviour with children are established in our Child Safety Code of Conduct and Duty of Care Policies
- the safety of children is dependent upon the existence of a child safe culture
- child safety awareness is promoted and openly discussed within the ILC community
- comprehensive procedures are in place to screen all staff
- child safety and protection are everyone's responsibility
- safeguarding children training is mandatory for all the Jesuit Social Services Board members, staff and visitors with direct contact with students
- procedures for responding to alleged or suspected incidents of child abuse are simple and accessible for all members of the ILC community
- children from culturally or linguistically diverse backgrounds have the right to special care and support including those who identify as Aboriginal or Torres Strait Islander
- children who have any kind of disability have the right to special care and support

In its planning, decision-making and operations the ILC will:

- take a preventative, proactive and participatory approach to child safety
- value and empower children to participate in decisions which affect their safety
- respect diversity in cultures and child rearing practices while keeping child safety paramount
- provide written guidance on appropriate conduct and behaviour towards children
- engage only the most suitable people to work with children and ensure all school staff have a current Working with Children Check or Victorian Institute of Teaching registration
- ensure staff complete mandatory reporting and broad safeguarding professional learning annually
- ensure children know who to talk with or seek help from if they are worried or are feeling unsafe, and that they are comfortable and encouraged to raise such issues and feel listened to

- report suspected abuse, neglect or mistreatment promptly to the appropriate authorities
- share information appropriately and lawfully with other organisations where the safety and wellbeing of children is at risk
- value the input of and communicate regularly with families and carers

## 2.4 Key Responsibilities

Position/Roles	Responsibilities
<b>Jesuit Social Services Board</b>	<ul style="list-style-type: none"> <li>• Ensure Child Safe Standards are implemented.</li> <li>• Develop, review and endorse child safe policies (including this Policy) and procedures.</li> <li>• Ensure a culture of child safety is embedded into all aspects of the ILC.</li> <li>• Oversee performance of Leadership Team's role in relation to child safety.</li> <li>• Ensure appropriate resources are made available to allow child safe policies and procedures to be effectively implemented and for the effectiveness of the strategies put into practice to be periodically reviewed.</li> </ul>
<b>Leadership Team (Principal and Senior Teacher)</b>	<ul style="list-style-type: none"> <li>• Take practical measures to ensure Child Safe Standards are implemented and a strong child protection culture is maintained at the ILC.</li> <li>• Inform the ILC community about the strategies and allocated roles and responsibilities.</li> <li>• Be the first point of contact for raising child protection concerns within the ILC and coordinate responses to child protection incidents.</li> <li>• Develop and implement child safe policies and procedures approved by the Jesuit Social Services Board.</li> <li>• Develop and implement strategies to embed an organisational culture of child safety.</li> <li>• Periodically review the effectiveness of the strategies put into practice.</li> <li>• Lead the ILC's child safety culture, including by allocating and coordinating specific roles and responsibilities for child safety within the ILC.</li> <li>• Oversee staff recruitment and provide induction, training and supports to ensure staff comply with all child safe policies and procedures, and implement strategies.</li> <li>• Identify, analyse and reduce risks of child abuse and harm to children and monitor and evaluate the effectiveness of the risk controls.</li> </ul>
<b>All staff (including Contractors, Volunteers with direct contact with children)</b>	<ul style="list-style-type: none"> <li>• Be familiar with the content of all child safe policies and procedures and their legal obligations with respect to reporting child abuse.</li> <li>• Follow the legislative and internal school processes in the course of their work.</li> <li>• Be aware of key risk indicators of child abuse and raise concerns relating to child abuse with the Leadership Team.</li> <li>• Provide a physically and psychologically safe environment where the wellbeing of young people is nurtured.</li> <li>• Complete required child safeguarding training</li> </ul>

<b>Visitors without contact with children</b>	<ul style="list-style-type: none"> <li>• Contribute to the safety and protection of children.</li> <li>• Be familiar with all child safe policies and procedures.</li> </ul>
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## 2.5 Students

This Policy is intended to empower children to be vital and active participants in the ILC community. Children with involvement in the Youth Justice System have often experienced trauma and may have disabilities and special needs, making them particularly vulnerable; therefore, it is fundamental that the ILC supports students to develop their capacity to communicate their needs and build their understanding to involve them in decisions, especially around matters that directly affect them. We offer students opportunities for Child Abuse Awareness and Prevention Education. We listen to what students have to say and know that student behaviour and actions are communication methods. Staff will value, understand and respect what our students have to say. Children who disclose child abuse or are linked to suspected child abuse will be assisted and supported.

We promote diversity and tolerance at the ILC, and people from all walks of life and cultural backgrounds are welcome. In particular we:

- promote the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander children
- promote the cultural safety, participation and empowerment of children from culturally and or linguistically diverse backgrounds
- ensure that children with a disability are safe and can participate equally

Families/guardians/carers will be made aware of child safety matters and supported, encouraged and enabled to understand, identify and discuss and report child safety matters for the benefit of children.

## 2.6 Student wellbeing and learning

The ILC will embed student wellbeing in all learning experiences by aligning student welfare and curriculum policies and creating an educational environment and curriculum that is inclusive and meaningful to all students through:

- providing an integrated and comprehensive curriculum approach that incorporates the personal and social issues of students into their daily learning experiences and builds personal resilience
- providing a flexible, relevant, inclusive and appropriate curriculum
- the curriculum will include the building of socio-emotional skills, engaging students in age appropriate concepts such as communication, emotional self-regulation, respectful relationships, Alcohol and Other Drug education, reproductive health and behaviours, sexuality and sex education, mindfulness, gender norms and healthy masculinities that address some of the underlying causes of challenging and risk-taking behaviours.

## 2.7 Staff

This Policy guides our staff (which includes volunteers and contractors – see definitions) on how to behave with children in the ILC community.

All our staff must agree to abide by the Jesuit Social Services' Code of Conduct and Child Safety Code of Conduct which specify the standards and conduct required when working with children and the additional requirements of working with children involved in the Youth Justice System. The Code of Conduct lists explicit examples of acceptable and unacceptable behaviours and legislative requirements. All staff, as well as children and their families/guardians/carers, are given the opportunity to contribute to the development of the ILC Child Safety Code of Conduct.

## 2.8 Training and supervision

Training and education are important to ensure that the staff, contractors and volunteers at the ILC understand that child safety is everyone's responsibility.

The ILC's organisational culture aims for all staff, (which includes volunteers and contractors), in addition to parents/guardians/carers and children, to feel confident and comfortable in discussing any allegations of child abuse or child safety concerns. Staff are trained annually to identify, assess and minimise risks of child abuse and to detect potential signs of child abuse. We provide educational programs to children and parents/guardians/carers to support, encourage and enable them to understand, identify, discuss and report child safety matters. We recognise the special situation that children involved in the Youth Justice System and their families/guardians/carers find themselves in with respect to child safety and vulnerability to child abuse and our staff are trained and supported accordingly.

The ILC has developed a set of Child Safe Human Resource Practices specific to the ILC to ensure our staff have opportunities to develop and maintain skills to ensure child safety at the ILC. The ILC supports our staff through ongoing supervision to: develop their skills to protect children from abuse; and promote the cultural safety of Aboriginal and Torres Strait Islander children, the cultural safety of children from linguistically and/or diverse backgrounds, and the safety of children with a disability or who are vulnerable.

New employees and volunteers will be provided with induction and training, including the ACF online child safety training, and will be closely supervised to ensure they understand our organisation's commitment to child safety and that everyone has a role to play in protecting children from abuse, as well as checking that their behaviour towards children is safe and appropriate. Any inappropriate behaviour will be reported through the proper channels, including the Department of Families, Fairness and Housing (DFFH), CCYP and Victoria Police, in line with legislative and regulatory requirements and the ILC Child Protection Reporting Obligations Policy, depending on the severity and urgency of the matter.

## 2.9 Staff recruitment

The ILC has developed a set of Child Safe Recruitment Practices that the ILC follows when recruiting and selecting staff to work at the ILC.

The ILC takes all reasonable steps to employ skilled people to work with our students. Selection criteria and advertisements are developed to clearly demonstrate our commitment to child safety and an awareness of our social and legislative responsibilities. The ILC understands that when recruiting staff, ethical as well as legislative obligations exist. In line with legislative obligations, the ILC will gather, verify and record the following information: Working with Children Check status, or similar check; proof of personal identity and any professional or other qualifications; the person's history of work involving children; and references that address the person's suitability for the job and working with children.

Applications are encouraged from Aboriginal and Torres Strait Islander peoples and people from culturally and/or linguistically diverse backgrounds. All staff are required to uphold the mission and ethos of Catholic Schools.

All those in the role of teacher must be registered with the Victorian Institute of Teaching. All other staff, including volunteers, are required to hold a Working with Children Check and provide evidence of this Check. Reference checks and police record checks are carried out to ensure that the right people are recruited. Police record checks are used only for the purpose of recruitment and are discarded after the recruitment process is complete. Some record is retained (but not the actual criminal record) if an applicant's criminal history affected the decision making process.

If during the recruitment process a person's records indicate a criminal history the person will be given the opportunity to provide further information and context.

Once engaged, workers/volunteers must review and acknowledge their understanding of this Policy. In line with the ILC's Child Safe Human Resource Practices, continuing suitability of school staff will be regularly monitored, assessed and recorded.

## **2.10 Fair procedures**

The safety and wellbeing of children is the ILC's primary concern. The ILC also seeks to be fair and just to staff. The decisions made when recruiting, assessing incidents, and undertaking disciplinary action will always be thorough, transparent and based on evidence. All allegations of abuse and safety concerns are addressed in accordance with the ILC Child Protection Reporting Obligations Policy. All such allegations are recorded using the ILC's incident reporting form, including investigation updates. All records are securely stored. If an allegation of abuse or a safety concern is raised, updates are provided to children and families/guardians/carers and other organisations where required (for example DFFH, MACS and/or CCYP) on progress and any actions the ILC takes.

## **2.11 Privacy**

All personal information considered or recorded will respect the privacy of the individuals involved, whether they be staff, volunteers, visitors, parents of children, guardians or carers, unless there is a risk to someone's safety. The ILC has safeguards and practices in place to ensure any personal information is protected in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth). Everyone is entitled to know how this information is recorded, what will be done with it, and who will access to it.

Further information about privacy can be found in the ILC's Privacy Policy, which is publicly available.

## **2.12 Risk reduction and management**

The ILC proactively manages the risk of abuse to children in addition to managing occupational health and safety risks.

The ILC has a documented approach to prevent, detect and respond to child safety risks, which involves the implementation of a child safe risk management framework developed for use by the Jesuit Social Services Board, Principal and key ILC staff members. This includes child abuse risks, as well as risks of harm to children that arise in the physical school environment and online environments. It includes steps for ongoing monitoring and evaluating of risks in light of the risk controls currently in place, and their effectiveness. A risk assessment register is maintained to identify and address risks and to monitor and evaluate the effectiveness of the actions the ILC takes to reduce or remove risks to child safety.

## **2.13 Allegations, concerns and complaints**

The ILC has detailed procedures for responding to allegations, concerns and complaints related to child safety. These are documented in the ILC's Child Protection Reporting Obligations Policy, which is publicly available. The ILC takes all allegations seriously and has practices in place to investigate thoroughly and quickly including referring to external bodies where appropriate. Staff are trained to deal appropriately with, including reporting, allegations. Any concerns and complaints not related to child safety will be raised by the ILC community using the process set out in the ILC Complaints Policy.

The ILC works to ensure all children, families/guardians/carers, staff know what to do and who to tell if they observe abuse or are a victim, and if they notice inappropriate behaviour. The ILC community has a shared responsibility to report an allegation of abuse if there is a reasonable belief that an incident took place.

If an adult has a reasonable belief that an incident has occurred then they must report the incident. Factors contributing to reasonable belief may be:

- a child states they or someone they know has been abused (noting that sometimes the child may in fact be referring to themselves)
- behaviour consistent with that of an abuse victim is observed<sup>#</sup>
- someone else has raised a suspicion of abuse but is unwilling to report it
- observing suspicious behaviour\*

\*Refer to PROTECT Identifying and Responding to All Forms of Abuse in Victorian Schools

\*When working with students involved in the Youth Justice System there may be instances where a student's behaviour provides important indicators of abuse or neglect because they have difficulty clearly verbalising their concerns; through understanding behaviour, monitoring behaviour and patterning behaviour we can increase opportunities for student safety and support.

In situations where the Principal is suspected of involvement in the activity, or if the person having the suspicion does not believe that the matter is being appropriately addressed or dealt with, the matter should be reported to the next highest level of supervision, namely, the Chief Executive Officer, Jesuit Social Services and the Chair of the Jesuit Social Services Board and/or police.

The ILC is obligated to report to the Victorian Institute of Teaching (VIT) and CCYP any charges, committals for trial or convictions in relation to a sexual offence by a registered teacher, and certain allegations or concerns about a registered teacher.

## 2.14 ILC Investigations

If DFFH or Victoria Police decide to conduct an investigation of a report, all employees, contractors or volunteers must cooperate fully with the investigation. Interviewing of students will be managed in accordance with MACSPolicy 219.a – [Police and DFFH Protocols](#).

The Principal may consult with the authorities to determine whether an internal investigation is appropriate. If it is decided that an investigation will not conflict with any proceeding of the authorities, the Principal may decide to conduct an investigation. All employees, contractors and volunteers must co-operate fully with the investigation. Any such investigation by the Principal will be conducted according to the rules of natural justice. The Principal will make every effort to keep any such investigation confidential; however, from time to time other members of staff may need to be consulted in conjunction with the investigation.

After an initial review and a determination that the suspected abuse falls under 'Reportable Conduct' and warrants additional investigation, the Principal shall coordinate (often with assistance from MACS Employee Relations Unit and/or the Director of Professional Standards) the investigation with the appropriate investigators and/or law enforcement officials. If the matter related to inappropriate behaviour of a staff member the matter will also be reported to the CCYP under the Reportable Conduct Scheme. Internal or external legal representatives will be involved in the process, as deemed appropriate.

## **2.15 Responding**

As part of its duty of care the ILC will provide support for any student impacted by abuse.

If it is alleged that a member of staff, contractor or a volunteer or other visitor may have committed an offence or have breached the ILC's policies or its Child Safety Code of Conduct, the person concerned may be stood down (with pay, where applicable) while an investigation is conducted. Any such investigation would only commence after clearance from the police and child protection.

If the investigation concludes that on the balance of probabilities an offence (or a breach of the ILC's policies or Code of Conduct) has occurred then disciplinary action may follow, up to and including dismissal or cessation of involvement with the organisation. The findings of the investigation will also be reported to any external body as required.

## **2.16 Records**

All reports made to external authorities, such as DFFH, Victoria Police or the Commission for Children and Young People, will be recorded in accordance with the ILC's Child Protection Reporting Obligations Policy.

All records or reports about suspected or alleged child abuse and inappropriate behaviour will be retained by the Principal (or Chair of the Jesuit Social Services Board, if made about the Principal) in a separate, confidential and secure file.

## **2.17 Evaluation and review**

An annual review of what additional needs of students have been identified and how they may be better addressed, what activities have changed and what can be learned from mistakes will be undertaken.

There will be a review if guidelines change, and following every reportable incident. The review will take into account emerging thinking, evidence and practice about the prevention of child abuse and neglect.

Families/guardians/carers and children will have the opportunity to contribute to the review of this Policy. Where possible the ILC will do its best to work with the local Aboriginal communities, linguistically diverse communities and people with a disability. Recent publications produced by the Commission for Children and Young People will be used as references for consideration and improvement.

## **2.18 Communication**

All members of the ILC community will be made aware of this Policy and the ILC's commitment to child safety.

The Policy will be publicly available on the ILC's website and communicated in the school's newsletters, in information sessions, at staff meetings, during recruitment and staff induction, during Board induction and during the enrolment process.

### **3. EXPECTED OUTCOMES**

The expected outcomes of this policy include:

- that everyone is aware of the ILC's commitment to child safety, that the school has zero tolerance for child abuse, and that it listens to and empowers children and keeps them safe
- an overview of the key elements of the ILC's approach to creating a child safe organisation
- the communication of the overarching set of principles that guide the development of the ILC policies and procedures that aim to protect children from abuse and harm
- a description of key roles and responsibilities at the ILC in relation to child safety
- an overview of reporting procedures and other strategies and procedures in place in line with Ministerial Order 870

END OF DOCUMENT

Policy owner:	ILC Principal
Policy category:	Care, Safety and Welfare of Students
Level of approval:	Jesuit Social Services Board
Review Date:	February 2023
Purpose:	To establish the foundations for ensuring the ILC is a safe place for children
Relevant legislation and/or standards:	<p><i>Crimes Act 1958 (Vic)</i>  <i>Children, Youth and Families Act 2005 (Vic)</i>  <i>Child Wellbeing and Safety Act 2005 (Vic)</i>  <i>Education and Training Reform Act 2006 (Vic)</i>  <i>Family Violence Protection Act 2008 (Vic)</i>  <i>Ministerial Order 870: Child Safe Standards – Managing the risk of child abuse in schools</i>  <i>Working with Children Act 2005 (Vic)</i>  <i>Privacy Act 1988 (Cth)</i>  <i>Victorian Charter of Human Rights and Responsibilities (Section 19 of the Charter protects cultural rights)</i></p>
Risk Awareness:	Operational, Reputational, Compliance, and OHS
Related Documents:	<p><b>Internal</b></p> <ul style="list-style-type: none"> <li>• Jesuit Social Services Code of Conduct</li> <li>• Child Protection Reporting Obligations Policy</li> <li>• Child Safety Code of Conduct</li> <li>• Child Safe Human Resource Practices</li> <li>• Child Safe Risk Management Framework</li> <li>• Duty of Care Policy</li> <li>• Complaints Policy</li> </ul> <p><b>External</b></p> <ul style="list-style-type: none"> <li>• CECV <a href="#">Child Safety Guides</a></li> <li>• VRQA <a href="#">Child Safety Resources</a></li> </ul>
Scope:	The ILC Community
Definitions:	<p>ACF                              Australian Childhood Foundation</p> <p>ILC                              Ignatius Learning Centre</p> <p>Child                            a person below the age of 18 years and young people 18 or above enrolled at the ILC in line with Ministerial Order 870.</p> <p>Child abuse                    Includes:</p> <p>(a) any act committed against a child involving</p> <ul style="list-style-type: none"> <li>(ii) a sexual offence; or</li> <li>(iii) an offence under section 49B (2) of the Crimes Act 1958 (grooming); and</li> </ul> <p>(b) the infliction, on a child, of</p> <ul style="list-style-type: none"> <li>(i) physical violence; or</li> <li>(ii) serious emotional or psychological harm; and</li> </ul> <p>(c) serious neglect of a child.</p>
CCYP	Commission for Children and Young People
Child connected work	work authorised by the school governing authority and performed by an adult in a school environment while children are present or reasonably expected to be present.
Child protection	any responsibility, measure or activity undertaken to safeguard children from harm.
Child Safety	encompasses matters related to protecting all children from child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to incidents or allegations of child abuse.

DFFH	Department of Families, Fairness and Housing
Director of Professional Standards	Role in the Australian Province of the Society of Jesus with responsibility for supporting safeguarding and reporting.
MACS	Melbourne Archdiocese Catholic Schools
Staff	<p>an individual working in the ILC environment who is:</p> <ul style="list-style-type: none"> <li>(a) directly engaged or employed by the Board or the Principal</li> <li>(b) a volunteer or a contracted service provider (whether or not a body corporate or any other person is an intermediary)</li> <li>(c) a minister of religion</li> </ul>
School environment	<p>any physical or virtual place made available or authorised by the Jesuit Social Services Board for use by a child during or outside school hours, including;</p> <ul style="list-style-type: none"> <li>(a) A campus of the ILC;</li> <li>(b) Online school environments (including email and intranet systems); and</li> <li>(c) Other locations provided by the school for a child's use (including, without limitations, locations used for school camps, sporting events, excursions, competitions, work experience, homestay accommodation, and other events.)</li> </ul>
VIT	Victorian Institute of Teaching
Policy:	Catholic schools have a moral, legal and mission-driven responsibility to create nurturing school environments where children and young people are respected, their voices are heard and where they are safe and feel safe. Consistent with the CECV Commitment Statement to Child Safety, this Policy provides principles and procedures aimed at protecting children from abuse and harm, which will influence the ILC's culture. It raises awareness of child safety in the school and in the community.
Responsibilities:	The ILC Principal, all staff and visitors