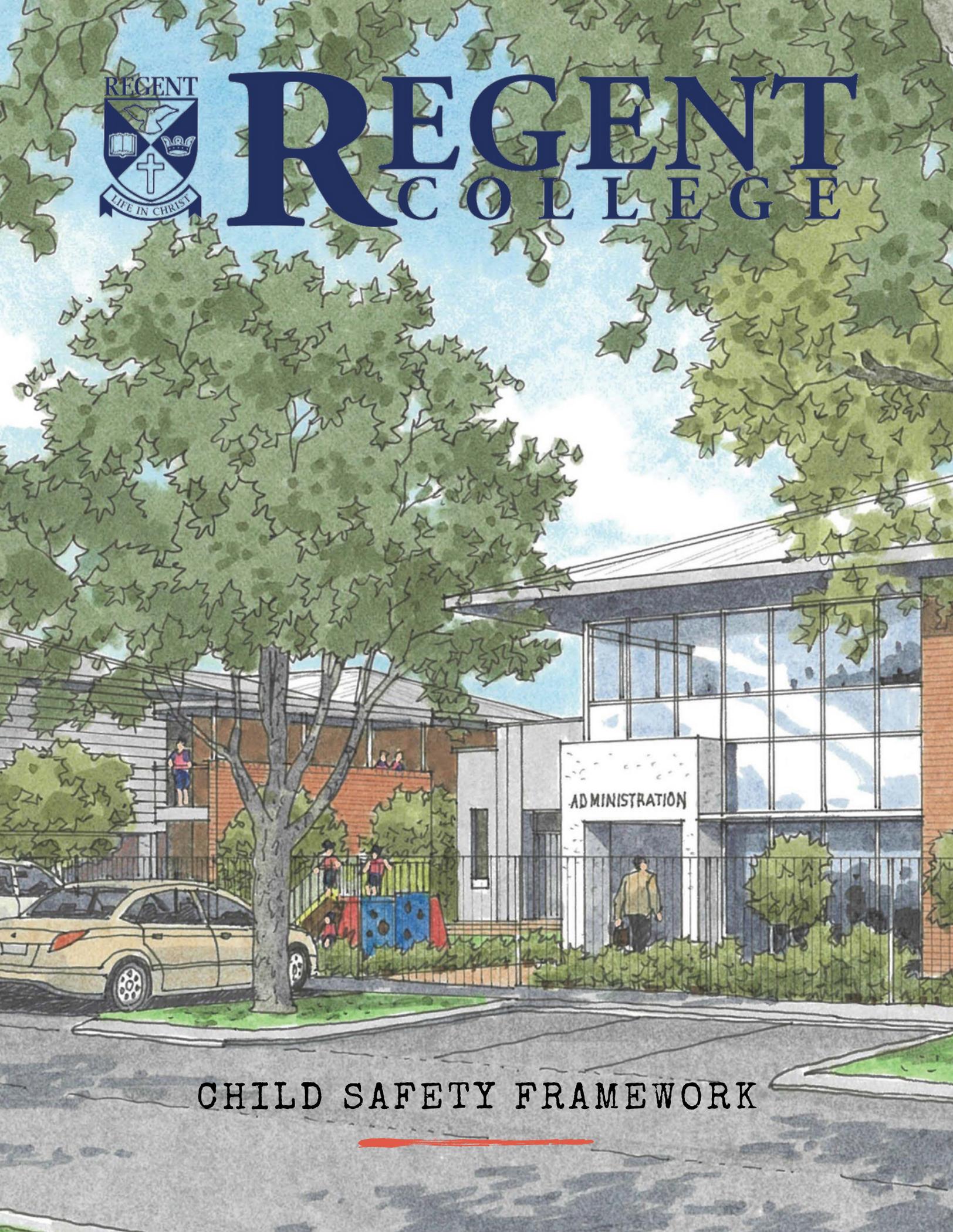




REGENT COLLEGE



CHILD SAFETY FRAMEWORK

CHILD SAFETY FRAMEWORK



The Child-Safe Organisation Framework, as identified for Department of Education Renewal of Registration (Non-Government School Regulation) has guided the development of policies and procedures at Regent College is the National Principles for Child Safe Organisations (Australian Human Rights Commission).

Regent College is a child safe organisation and seeks to always uphold the National Principles for Child Safe Organisations in order to create a culture, adopt strategies and take action to promote child wellbeing and prevent harm to children and young people.

This prioritising of child safety underpins all aspects of school life, as established in the College Child Protection Policy, which is a statement of commitment to the protection of children from abuse and grooming. The policy provides for the implementation of robust procedures to deter such behaviours and to facilitate detection and reporting in a manner that is consistent with the College's position of zero tolerance to child abuse and grooming.

Whilst the Child Protection Policy primarily posits the College's theoretical dedication to safeguarding children and young people, this Child Safety Framework demonstrates how the College practically undertakes procedures in order to seek to achieve the promotion of well-being and prevention of harm to children and young people.

This Child Safety Framework lists the Principles from the National Principles for Child Safe Organisations and outlines how Regent College seeks to ensure that each Principle is addressed and met through school operations, including programs and processes occurring at the College.

This Child Safety Framework should be read in conjunction with the Child Protection Policy, as well as the Safe Code of Conduct and the Staff Handbook. Collectively, these documents constitute the College's policies, procedures, practices and strategies for the prevention of grooming and child abuse as informed by an authoritative and context-appropriate child-safe organisation framework.



Child Safe
Organisations
National Principles

National Principles for Child Safe Organisations

1

Child safety and wellbeing is embedded in organisational leadership, governance and culture.

6

Processes to respond to complaints and concerns are child focused.

2

Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

7

Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

3

Families and communities are informed, and involved in promoting child safety and wellbeing.

8

Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

4

Equity is upheld and diverse needs respected in policy and practice.

9

Implementation of the national child safe principles is regularly reviewed and improved.

5

People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

10

Policies and procedures document how the organisation is safe for children and young people.



For information and resources, go to
<https://childsafe.humanrights.gov.au>



1 Child safety and wellbeing is embedded in organisational **leadership, governance and culture.**

Regent College complies with this Principle in a number of ways including:

- the development of this Child Safety Program, Child Safe Policy and Child Safe Code of Conduct
- the appointment of senior staff members as the College's Principals who act as "Child Safety Champions" and are tasked with the overall responsibility for embedding an organisational culture of child protection and safety in the College
- each Regent College Board member, staff member, Direct Contact Volunteer and mandatory reporter having to complete Child Safety Training which provides information with respect to key risk indicators of child abuse and grooming and reporting procedures
- taking a risk-management approach (see appendix 1) to our Child Safety obligations, including ongoing, periodic reviews of all physical College environments to eliminate physical isolation risks, such as solid classroom doors or rooms with no windows, or implement procedural controls where elimination is not possible
- establishing clear guidelines for reporting child abuse and grooming concerns (see appendix 2)
- creating an environment supportive of children from culturally diverse backgrounds (see appendix 3) and children with disabilities (see appendix 4)
- Regent College's procedures for Response and Support Following a Child Safety Incident include clear protocols for Information Sharing with the College Community which outline the requirement for consultation with relevant external authorities prior to sharing any information about a disclosure or allegation of abuse or grooming, including the Department for Child Protection and Family Support (CPFS) and the Police, as well as record keeping in regards to any reported Child Safety incidents



2 Children and young people are informed about their **rights, participate** in decisions affecting them and are taken seriously.

Regent College has developed strategies to deliver developmentally appropriate protective behaviours curriculum to all students at the College to promote the participation and empowerment of children.

The Participation and Empowerment section of the College's Child Safety Program aims to ensure that all children in the College community, including those from culturally or linguistically diverse backgrounds and students with a disability, are educated about child protection and safety in the College environment and feel empowered to report concerns about their safety.



3 Families and communities are **informed** and **involved** in promoting child safety and wellbeing.

Regent College acknowledges that our Child Safety Program will be most effective if it is communicated to all people in the College community, and those people feel supported to discuss, address and respond to Child Safety issues at the College.

The College makes our Child Safe Policy and Child Safe Code of Conduct available on the College's public website to ensure that they are readily accessible by all members of the community. Hard copies of these documents are also available at the College's reception area. Copies of the College's other Child Safety policies and procedures are available on request.

Regent College has developed and effectively implemented procedures for Response and Support Following a Child Safety Incident which include procedures for the support of students, families, and staff and volunteers following a disclosure or allegation of abuse or grooming.



4 **Equity** is upheld and **diverse needs** respected in policy and practice.

The Participation and Empowerment section of the College's Child Safety Program aims to ensure that all children in the College community, including those from culturally or linguistically diverse backgrounds and students with a disability, are educated about child protection and safety in the College environment and feel empowered to report concerns about their safety.



5 People working with children and young people are suitable and **supported** to reflect child safety and wellbeing values in practice.

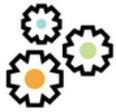
Regent College has created child-safe human resources practices including those relating to recruitment and selection of staff and volunteers and WWC Checks.

Each job description for those involved in child-connected work at Regent College has a clear statement that sets out the requirements, duties and responsibilities regarding Child Safety for those in that role and the occupant's essential qualifications, experience and attributes in relation to Child Safety.

All applicants for child-connected work at the College are informed about these requirements and the College's Child Safety practices, including a commitment to the College's Child Safe Code of Conduct prior to commencing work at the College.

Regent College recognises that without training and education of our staff, Regent College Board members and Direct Contact Volunteers, our policies and procedures will not operate to effectively keep our students safe and protect them from abuse and grooming behaviours.

Regent College staff, Regent College Board members, Direct Contact Volunteers and mandatory reporters receive Child Safety training when they first commence their role at the College and are required to complete ongoing training on Child Safety issues at least annually.



6 Processes to respond to **complaints** and **concerns** are child focused.

Regent College has a Child Friendly Complaints Policy developed in line with regard to the six elements of a child-friendly complaints system outlined in the WA Commissioner for Children and Young People Guide, Are you Listening? Guidelines for making complaints systems accessible and responsive to children and young people:

- Focus on children and young people
- Visibility
- Accessibility
- Responsiveness
- Confidentiality
- Accountability and continuous improvement.

We have also developed and implemented a Complaints Handling Policy which includes policies and procedures which clearly outline roles and responsibilities, approaches to dealing with different types of complaints and obligations to act and report.

All complaints are taken seriously, responded to promptly and reported regularly through CompliSpace Assurance.



7 **Staff** and **volunteers** are equipped with the knowledge, skills and awareness to keep children and young people safe through **ongoing education** and **training**.

Regent College recognises that without training and education of our staff, Regent College Board members and Direct Contact Volunteers, our policies and procedures will not operate to effectively keep our students safe and protect them from abuse and grooming behaviours.

Regent College staff, Regent College Board members, Direct Contact Volunteers and Mandatory Reporters receive Child Safety training when they first commence their role at the College and are required to complete ongoing training on Child Safety issues at least annually.

All Regent College Board members, staff and Direct Contact Volunteers at Regent College are required to undergo Child Safety training at least annually which includes a Module focused on externally reporting Child Safety concerns and the Mandatory Reporting obligations of certain members of the College community.

Regent College's procedures for Detecting and Reporting Child Safety Incidents encourage all members of the College community to report all child protection and safety concerns the Principal or the Chair of the Regent College Board should the concern involve the Principal.

The College procedures for Reporting Child Safety Incidents Internally emphasise that reporting concerns internally does not discharge the individual mandatory reporting obligations of Mandatory Reporters at the College.



8 Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

Regent College has developed and effectively implemented a number of policies, procedures, work practices and strategies for Creating and Maintaining Child-Safe Environments.

We take a risk-management approach to our Child Safety obligations, including ongoing, periodic reviews of all physical College environments to eliminate physical isolation risks, such as solid classroom doors or rooms with no windows, or implement procedural controls where elimination is not possible.

Regent College has developed a Student Code of Conduct which sets out the minimum standards of conduct in the College. Bullying, harassment and peer-to-peer abuse are not tolerated in the College.

Regent College has developed policies and procedures for managing this behaviour:

- Bullying Prevention and Intervention Policy
- Harassment Policy
- Cyber Safety Policy



9 Implementation of the national child safe principles is **regularly reviewed** and **improved**.

Regent College is committed to ensuring that our Child Safety Program is reviewed annually and continuously updated after key events as detailed in our Continuous Review and Improvement Policy.



10

Policies and **procedures**

document how the organisation is safe for children and young people.

Regent College complies with this section through the development of this Child Safety Program, our Child Safe Policy and our Child Safe Code of Conduct.

Regent College has also created a plain English Child Safe Code of Conduct which specifies appropriate standards of behaviour for adults towards students in all College environments, including outside of school hours.

In addition to our broad expectations for child-safe behaviour in all College environments expressed in our Child Safe Code of Conduct, the College has developed a comprehensive Staff and Student Professional Boundaries policy which outlines guidelines for specific aspects of interactions with children and young people.

PROTECTIVE BEHAVIOURS CURRICULUM



KEEPING SAFE: CHILD PROTECTION CURRICULUM

Why a Protective Behaviours Curriculum?

Regent College is committed to providing a child safe environment which safeguards all students and is committed to promoting practices which provide for the safety, wellbeing and welfare of our children and young people. The College expects all community members including staff, volunteers, students, visitors and contractors to share this commitment.

Children and young people have the right to:

- Be treated with respect and to be protected from harm
- Feel and be safe in their interactions with adults and other children and young people;
- Understand, as early as possible, what is meant by 'feeling and being safe'; and
- Receive the support of staff in their education whose role includes advocacy for their safety and wellbeing.

The teaching of a Protective Behaviours Curriculum is part of the Non-Government school's registration with the Department of Education as stated in:

10.1 The school implements the National Child Safe Organisation Principles

10.6 All students have a protective behaviours and sexual abuse prevention education which:

- a) is developed by experts in child abuse prevention;
- b) is age and developmental-stage appropriate;
- c) is culturally appropriate;
- d) is integrated into the curriculum of the school and makes relevant subject matter links;
- e) includes e-safety education; and
- f) builds practical self-protective skills and strategies

There are two themes and four focus areas in the Keeping Safe: Child Protection Curriculum.

THEME 1: We all have the right to be safe

THEME 2: We can help ourselves to be safe by talking to people we trust

PROTECTIVE BEHAVIOURS CURRICULUM



KEEPING SAFE: CHILD PROTECTION CURRICULUM OVERVIEW

	Early Years: Kindy – Year 2	Primary Years Years 3-5	Middle Years Year 6
FOCUS AREA 1: The right to be safe	<ol style="list-style-type: none"> 1. Feelings 2. Being Safe 3. Warning Signs 4. Risk-taking and emergencies 	<ol style="list-style-type: none"> 1. Being safe 2. Warning signs 3. Risk-taking and emergencies 	<ol style="list-style-type: none"> 1. Warning signs 2. Risk-taking and emergencies 3. Psychological pressure and manipulation
FOCUS AREA 2: Relationships	<ol style="list-style-type: none"> 1. Rights and responsibilities 2. Identity and relationships 3. Power in relationship 4. Trust and networks 	<ol style="list-style-type: none"> 1. Rights and responsibilities 2. Identity and relationships 3. Power in relationship 4. Trust and networks 	<ol style="list-style-type: none"> 1. Rights and responsibilities 2. Identity and relationships 3. Power in relationship 4. Trust and networks
FOCUS AREA 3: Recognising and reporting abuse	<ol style="list-style-type: none"> 1. Privacy and the body 2. Recognising abuse 3. Secrets 	<ol style="list-style-type: none"> 1. Privacy and the body 2. Recognising abuse 3. Cyber Safety 	<ol style="list-style-type: none"> 1. Privacy and the body 2. Recognising abuse 3. Cyber Safety 4. Domestic and family violence
FOCUS AREA 4: Protective Strategies	<ol style="list-style-type: none"> 1. Strategies for keeping safe 2. Persistence 	<ol style="list-style-type: none"> 1. Strategies for keeping safe 2. Network review and community support 	<ol style="list-style-type: none"> 1. Strategies for keeping safe 2. Network review and community support

APPENDICES

APPENDIX 1 CHILD SAFETY RISK MANAGEMENT



The College has adopted a risk management approach to Child Safety by developing and implementing strategies to identify and mitigate our Child Safety risks based on:

- the nature of all College environments – physical and online
- the activities students undertake at the College (including the provision of services by contractors or outside the College's physical environment)
- the characteristics and needs of all of our students.

Risk Management Strategies

Regent College has implemented the following risk mitigation strategies to ensure that the College maintains a proactive approach to our duty of care to protect children from harm and complies with our legal and regulatory obligations:

- this Child Protection Program with policies and procedures to deter and facilitate the detection of abuse and grooming behaviours, including our Child Safe Policy and our Child Safe Code of Conduct
- a comprehensive Staff and Student Professional Boundaries policy, implemented through training and communicated publicly
- induction and ongoing training provided to staff, Regent College Board Members, Mandatory Reporters and Direct Contact Volunteers and Direct Contact Contractors, at least annually, about identifying risks of child abuse and grooming in all College environments, their obligations and responsibilities for managing these risks, how to report and respond to child protection and safety incidents, and the College's current child safety standards
- the appointment of the College's Leadership who are "Child Safety Champions" at the College and receive specialised, additional training to ensure that any concerns about child protection and safety in any College environment held by students, staff, Volunteers and parents/guardians may be discussed in a safe and supportive environment
- extensive policies and procedures relating to excursions and camps ensuring that Child Safety risks specific to excursions and overnight stays are identified and controls are put in place

- the creation of child-safe premises through ongoing, periodic reviews of all physical College environments to eliminate physical isolation risks, such as solid classroom doors or rooms with no windows, or implement procedural controls where elimination is not possible
- The delivery of a developmentally appropriate protective behaviours curriculum to all students, addressing the boundaries between appropriate and inappropriate interactions and when, how and who to tell when a boundary is crossed
- specific procedures for verifying the Working with Children Check status of all External Education Providers and Direct Contact Contractors, who may have direct unsupervised contact with students, to ensure that students remain safe in all College environments both internal and external to the College grounds
- identifying and recording all risks of child abuse and grooming in all College environments in a Child Safety risk register, and assessing the risks with regard to the likelihood of the risk event occurring and the potential consequences if it was to occur
- a system of assurance through which risks of child abuse and grooming, and actions taken to reduce or remove these risks (risk controls), are recorded. The system is also used to monitor risk controls and to evaluate their overall effectiveness on a regular basis.

Regent College's Assurance System

The College has developed and implemented an online Assurance system as one strategy to manage the risk of child abuse and grooming in all College environments.

CompliSpace Assurance is an online risk and compliance workflow and incident management tool that integrates with our Child Safety Program to provide a system of risk management, compliance and continuous improvement based on international standards.

Through this system, key risks and compliance obligations are captured, documented and converted into plain-English questions that are assigned via email to responsible individuals for action. Each individual is provided with a calendar view of their compliance performance via an online browser. Unactioned tasks are escalated and reported to allow the College to monitor and record its compliance performance in real-time. The College also uses this risk management system as a method of evaluating and reviewing the ongoing effectiveness of the implementation of its risk measures and controls.

APPENDIX 2 DETECTING AND REPORTING CHILD SAFETY INCIDENTS



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

The College will take appropriate, prompt action in response to all allegations or disclosures of abuse, grooming, neglect, inappropriate behaviour or concerns about child safety by reporting all matters to the Department for Child Protection and Family Support (CPFS) or the Police, depending on the allegation or disclosure made.

Regent College has established simple and accessible procedures for anyone to report a Child Safety concern internally to the Principal or Deputy Principal to guide and assist members of the College community to detect and report child abuse.

Reporting procedures for Third Party Contractors, External Education Providers, Indirect Contact Volunteers, parents/guardians and other community members are also included in our Child Safe Policy which is available on our public website and staff intranet.

Our reporting procedures do not:

- prohibit or discourage College staff from reporting an allegation of child abuse or grooming to an appropriately authorised person external to the College
- state or imply that it is a victim's responsibility to inform the Principal or other authorities of the allegation
- require staff to make a judgement about the truth of the allegation of child abuse or grooming
- prohibit staff from making records in relation to an allegation or disclosure of child abuse or grooming.
- Age-appropriate reporting procedures for students are developed through our Child Safety education program.

This section of our Child Safety Program describes our work systems, practices, policies and procedures for responding to and reporting allegations of child abuse and grooming both internally and externally and includes:

Child Abuse – Definition and Key Risk Indicators
Managing Your Initial Response to a Child Safety Incident
Reporting Child Safety Incidents Internally
Mandatory Reporting of Sexual Abuse
Voluntary Reporting
Reporting Grooming Behaviours
Reporting Teacher Misconduct
Reporting Allegations by Former Students
Reporting Child Safety Program Breaches

Any victimisation of any person who discloses or alleges abuse, grooming behaviour or neglect is strictly prohibited at the College and any such action is subject to Disciplinary Procedures.

Fulfilling the roles and responsibilities contained in this procedure is not intended to displace or discharge any other obligations that arise if a person reasonably believes that a child is at risk of child abuse.

Responding to an Emergency

All teaching staff, non-teaching staff, Regent College Board members, Volunteers (Direct and Indirect Contact), Third Party Contractors and External Education Providers must act as soon as they witness a Child Safety incident or form a reasonable suspicion or belief that a child has been or is at risk of being abused or groomed.

If a child is at immediate risk of harm you must ensure their safety by:

- separating alleged victims and others involved
- administering first aid
- calling 000 for urgent medical assistance or Police assistance to address immediate health and safety concerns
- notifying the Principal or the Chair of the Regent College Board
- nominating the Principal or Deputy Principal to be the future liaison with Police on the matter.

APPENDIX 3 CULTURAL DIVERSITY



Children from culturally diverse backgrounds are children who identify as having particular cultural or linguistic affiliations by virtue of their place of birth, ancestry or ethnic origin, religion, preferred language or language spoken at home or because of their parents' identification on a similar basis.

They include children of Aboriginal or Torres Strait Islander descent that identify as being Aboriginal or Torres Strait Islander.

Regent College values and respects the racial and cultural diversity of our students and is committed to ensuring that the backgrounds of all students are sensitively recognised, catered for, celebrated and valued so that racial and cultural differences do not compromise a student's safety and wellbeing.

It is our policy that:

- we identify children from culturally diverse backgrounds when they are enrolled in the College
- we employ appropriate strategies to ensure the safety of these children as required
- we encourage participation and empowerment of these children in the development of these strategies
- we consider these children when developing and implementing policies and procedures related to Child Safety at the College
- we educate our staff about these cultural differences and the strategies and procedures we have employed.

When supporting students from culturally diverse backgrounds, including Aboriginal or Torres Strait Islander students, or those who identify as Aboriginal or Torres Strait Islander, it is critical that the College provides culturally appropriate support. Where possible the College will work with relevant cultural support groups, ensure that confidentiality of the family is maintained and engage an interpreter when communicating with the student's family.

Students from refugee backgrounds who have been impacted by abuse may also be experiencing trauma, dislocation and loss. Sensitive consideration should be given when determining how to support the student and their family.

APPENDIX 4 STUDENTS WITH A DISABILITY



The College has an obligation to students with a disability to ensure that they are afforded the same level of educational and pastoral care as any other student at the College and considers how each policy and procedure the College develops and implements may affect students with a disability.

Regent College is committed to ensuring that we fulfil our legal obligations including those related to discrimination and disability standards (refer to our Disability Discrimination policy).

The College recognises that students with a disability will not only require additional assistance to participate and engage in College activities in a safe and supportive manner, but also that there are specific Child Safety risks that arise in relation to students with a disability.

This may include, for example, stricter screening procedures and training for staff who assist students who require help with personal activities such as toileting or dressing. The College has implemented specific risk controls in relation to the safety of students with disabilities.

Students with a disability at the College may also require varied reporting avenues or systems to students without a disability, and the College has considered this when creating and implementing its procedures for Detecting and Reporting Child Safety Incidents.

When supporting a student with a disability who has been impacted by child abuse or grooming, it is critical that the College considers:

- the chronological age, developmental age and cognitive function of the student in order to tailor developmentally appropriate support strategies
- the student's vulnerability to on-going abuse when considering the need to make a further report and/or implement further risk mitigation strategies.

Information about these topics, as well as other child safety and well-being topics, is made available to all students through various age appropriate pastoral care initiatives. Child safety and well-being topics are also incorporated into the College's curriculum.