Child Safety Policy and Procedure

1.   Rationale

This Ozford English Language Centre (Ozford) policy has been developed to meet the Victorian Child Safe Standards.

Child safety encompasses matters related to protecting all children from all forms of 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.

In fulfilling its commitment as a child safe organisation, this policy and procedure outlines Ozford's Child Safe obligations and responsibilities and implementation guidelines including the strategies to prevent or minimise risks to child abuse.

All Ozford staff and volunteers must comply with this policy and code of conduct.

2.   Scope

This policy applies to persons that undertake child connected work in Ozford school environments.

It applies to all staff. Staff is defined very broadly under the Victorian Child Safe Standards to include any persons engaged in child connected work in all Ozford environments. Child connected work means all work authorised by the Executive Management team and performed by an adult while children are present or reasonably expected to be present. This will include all persons engaged by Ozford or representing Ozford that may interact with younger students in any manner in Ozford's environments.

All Executive Management team and leadership members, staff, volunteers, students over the age of 18 years, contractors including student advocates and homestay hosts are responsible for building and maintaining our child safe culture, taking steps to prevent child abuse and operating in a manner consistent with the Child Safety Policy and Procedure.

Visitors, affiliates, contractors and consultants, appointed or engaged by Ozford, to perform functions and/or recognised for their contribution to Ozford and other persons that younger students may interact with on activities organised by Ozford must be aware of and comply with the Child Safety Policy and Procedure.

This policy and procedure applies to all Ozford school environments. School environments means any physical or virtual place made available by Ozford for use by a child during or outside school hours, including:
- A campus of the school;
- Online learning environments (including email and intranet systems); and
- Other locations provided by the school for a child's use including, without limitation, locations used for homestay services, student support services, school camps, sporting events, excursions, competitions, and other events.

3.   Definitions

Please refer to Appendix 1 for the definitions applicable for this policy and procedure.

4.   Policy

4.1   Ozford has zero tolerance to child abuse and is committed to embedding a culture of child safety within the organisation for protection and wellbeing of all children in all Ozford environments.

4.2   Ozford is committed to provide a child safe environment where children and young people are safe and feel safe, and their voices are heard about decisions that affect their lives.

4.3   Ozford's Principles that guide development of policies and procedures to create and maintain a child safe environment include:
- We have zero tolerance of child abuse.
- We strive to show leadership in child safety by taking a preventative, proactive and participatory approach to child safety.
- We have established and made accessible child safety policies, procedures, systems and practices that reflect the risks of Ozford.
- We value and empower younger students to participate in decisions that affect their lives. We recognise, respect and foster younger students' rights ensuring that they are comfortable and encouraged to speak up if they feel worried or unsafe.
- We uphold a culturally safe environment for younger students, staff and stakeholders while keeping child safety paramount. We respect and celebrate diversity and seek to be inclusive of all younger students.
- We engage people who are suitable to work with children and have appropriate supervision and professional development practices. We will ensure that staff are supported to implement the child safe policies to the extent that it is applicable to their role and responsibilities.
- We value the input of, consult with and communicate regularly with our students, staff and families.
- We foster a culture of openness that supports all persons to safely disclose risks of harm to children and encourage the reporting of suspected abuse, neglect or mistreatment promptly to the appropriate authorities.
- We will support our staff and students who disclose or are otherwise linked to suspected child abuse. We will manage all child safety concerns in a sensitive, confidential, honest, responsible and timely manner.
- We ensure the procurement policies for facilities and services from third parties ensure the safety of students.
- We will monitor compliance with and continuously improve the effectiveness of our child safe strategies.

4.4   Ozford is committed to providing a culturally child safe environment where children and young people are safe and feel safe, and their voices are heard about decisions that affect their lives.

4.5   Child safety is a shared and collective responsibility of all Ozford staff, students, volunteers, contractors who interact with underage students. Every adult has a duty of care to children.

4.6   Ozford recognises the potential child safety risks and is committed to implement risk management strategies to minimise child safety risks.

4.7   The Executive Management Team has the overall responsibility for ensuring that:
- Child safety and wellbeing is embedded in Ozford's leadership, governance and culture.
- Ozford's Risk management strategies focus on preventing, identifying and mitigating risks to younger students.
- Ozford's child safe culture is championed and modelled at all levels of Ozford.
- Ozford develops, implements and promotes its policies, procedures and practices that establish a culturally safe environment where younger students are respected and valued.
- The values and principles to create and maintain a child safe environment are upheld. A Code of Conduct provides guidelines for expected behavioural standards and responsibilities.
- Ozford periodically reviews the effectiveness of its strategies to embed a culture of child safety.

4.8   The Executive Management Team has the responsibility for developing and implementing child safe strategies for the risk of child abuse in all Ozford environments.

Standard 1 Culturally safe environment for Aboriginal children
4.9   The Executive Management Team will establish and maintain a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued.
- An aboriginal child's ability to express their culture and enjoy their cultural rights is encouraged and actively supported.
- Strategies are embedded within the organisation which equip all members to acknowledge and appreciate the strengths of Aboriginal culture and understand its importance to the wellbeing and safety of Aboriginal children and young people.
- Measures are adopted by Ozford ensure racism within Ozford is identified, confronted and not tolerated. Any instances of racism are addressed with appropriate consequences.
- Ozford actively supports and facilitates participation and inclusion within it by Aboriginal children, young people and their families.
- All of the Ozford policies, procedures, systems and processes together create a culturally safe and inclusive environment and meet the needs of Aboriginal children, young people and their families.

Standard 2 Child safety organisational leadership, governance and culture
4.10   The Executive Management Team will ensure Child safety and wellbeing is embedded in the Ozford culture.
- Ozford makes a public commitment to child safety. Ozford promotes child safety in the operations of Ozford, taking zero tolerance approach to child abuse and requiring all staff to uphold the Child Safety commitment.
- Ozford's Risk management strategies focus on preventing, identifying and mitigating risks to younger students.
- Ozford's child safe culture is championed and modelled by all staff.

Standard 3 Younger students are empowered

4.11 The Executive Management Team will ensure younger students are empowered about their rights, participate in decisions affecting them and are taken seriously.
- Younger students are informed about all of their rights, including to safety, information and participation. Ozford empowers and promotes younger student participation, particularly on matters that affect them including safety.
- The importance of friendships is recognised and support from peers is encouraged, to help younger students feel safe and be less isolated.
- Where relevant to the setting or context, younger students are offered access to sexual abuse prevention programs and to relevant related information in an age-appropriate way.
- Ozford ensures that staff are attuned to signs of harm and facilitate child-friendly ways for younger students to express their views, participate in decision-making and raise their concerns.
- Ozford has strategies in place to develop a culture that facilitates participation and is responsive to the input of younger students.
- Ozford will support, enable and encourage staff, parents and younger students to understand, identify, discuss and report child safety matters.
- Ozford will respect and support younger students who disclose or are otherwise linked to suspected child abuse.

Standard 4 Families and communities are informed and involved
4.12 The Executive Management Team will ensure Families and communities are informed and involved in promoting child safety and wellbeing.
- Families participate in decisions affecting their child.
- Ozford engages and openly communicates with families and the community about its child safe approach and relevant information is accessible.
- Families and communities have a say in the development and review of Ozford's policies and practices.
- Families, carers and the community are informed about Ozford's operations and governance.

Standard 5 Equity is upheld and diverse needs of younger students are respected
4.13 The Executive Management Team will ensure that equity is upheld and diverse needs respected in policy and practice.
- Ozford, including all staff, understands children and young people's diverse circumstances, and provides support and responds to those who are vulnerable as set out in Ozford's policies and procedures.
- Younger students have access to information, support and the Complaints and Appeals Policy and Procedure in ways that are culturally safe, accessible and easy to understand.
- Ozford pays particular attention to the needs of younger students with disability, children and young people from culturally and linguistically diverse backgrounds, those who are unable to live at home, and lesbian, gay, bisexual, transgender and intersex children and young people.
- Ozford pays particular attention to the needs of Aboriginal children and young people and provides/promotes a culturally safe environment for them.

Standard 6 People are suitable and supported to keep younger students safe
4.14 The Executive Management Team will ensure that people working with younger students are suitable and supported to reflect child safety and wellbeing values in practice.

- Recruitment, including advertising, referee checks and staff pre-employment screening, emphasise child safety and wellbeing.
- Relevant staff and volunteers have current working with children checks or equivalent background checks.
- All staff receive an appropriate induction and are aware of their responsibilities to younger students, including record keeping, information sharing and reporting obligations.
- Ongoing supervision and people management is focused on child safety and wellbeing.

Standard 8 Staff are equipped to keep younger students safe

4.15   The Executive Management Team will ensure that staff are equipped with the knowledge, skills and awareness to keep younger students safe through ongoing education and training.
- Staff are trained and supported to effectively implement this Child Safety Policy and Procedure.
- Staff receive training and information to recognise indicators of child harm including harm caused by other children and young people.
- Staff receive training and information to respond effectively to issues of child safety and wellbeing and support colleagues who disclose harm.
- Staff receive training and information on how to build culturally safe environments for children and young people.
- Staff are provided with information to understand their obligations on information sharing and record keeping.

Standard 7 Processes for complaints and concerns are child focused.

4.16   The Executive Management Team will ensure that processes for complaints and concerns are child focused.
- Ozford's Child Safety Policy and Procedure sets out the roles and responsibilities of leadership, staff, approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report.
- Ozford has an accessible, student focused Complaints and Appeals Policy and Procedure.
- Ozford makes its policies and procedures easy to understand and publicly accessible so the complaint handling processes can be understood by younger students, families and staff, and are culturally safe.
- Ozford ensures that all complaints are taken seriously and responded to promptly and thoroughly.
- Ozford's Responding to and reporting allegations of suspected child abuse Policy and Procedure addresses reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and co-operates with law enforcement. It also ensures that reporting, privacy and employment law obligations are met.

Standard 9 Physical and online environments promote safety and wellbeing

4.17   The Executive Management Team will ensure that all Ozford physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
- Staff identify and mitigate risks in the online and physical environments without compromising a child's right to privacy, access to information, social connections

and learning opportunities. Risk management plans consider risks posed by the organisational setting, activities and the physical environment.
- The online environment is used in accordance with this Child Safety Policy and Procedure.
- Ozford procurement policies ensure the safety of younger students.

Standard 10 Child Safe practices are regularly reviewed and improved
4.18   The Executive Management Team will ensure that the implementation of the Child Safe Standards is regularly reviewed and improved.
- The organisation regularly reviews, evaluates and improves child safe practices.
- Complaints, concerns and safety incidents are analysed to identify causes and systemic failures to inform continuous improvement.
- Ozford reports on the findings of relevant reviews to staff and volunteers, community and families, and children and young people.

Standard 11 Policies and procedures document Ozford's child safe practices
4.19   The Executive Management Team will ensure that Ozford's policies and procedures document how the Ozford is safe for younger students.
- Policies and procedures address all Child Safe Standards.
- Policies and procedures are documented and easy to understand.
- Best practice models and stakeholder consultation informs the development of policies and procedures.
- The EMT members champion and model compliance with policies and procedures.
- Staff understand and implement policies and procedures.

5.   Child Safe Code of Conduct
5.1   The objective of this Code of Conduct is to protect children and reduce any opportunities for child abuse or harm to occur.

5.2   All adults working for or connected to the Ozford environment have a moral and legal obligation and a Duty of Care to protect any younger student under their care from foreseeable harm and prevent child abuse and neglect.

5.3   People who work with younger students have a special responsibility in presenting themselves as appropriate role models. Modelling effective leadership and respect in their interactions with other employees, younger students can have a profoundly positive influence on their personal and social development.

1.1   Staff members have a duty of care to protect the safety, health and wellbeing of younger students in all Ozford environments. This Child safety Code of conduct is designed to take into account the needs of all children including that:
- Younger students are empowered about their rights, participate in decisions affecting them and are taken seriously.
- Equity is upheld, and diverse needs respected in policy and practice.
- Particular attention is given to the needs of students with disability, students from culturally and linguistically diverse backgrounds, students who are unable to live at home, international students, and lesbian, gay, bisexual, trans and gender diverse, intersex and queer (LGBTIQ+) students.
- Particular attention is given to the needs of Aboriginal students and provides and promotes a culturally safe environment for them.

5.4   All staff are required to have suitable child safe clearances, ie. a Working with Children clearance, before commencing employment at Ozford.

5.5   All staff, volunteers, contractors and any other member of the Ozford community <u>must</u>:

- Treat all students, families and other staff with respect both in all Ozford environments including as part of normal social and community activities.
- Observe child safety principles and manage child safety concerns in a sensitive, confidential, honest, responsible and timely manner.
- Model appropriate conduct and maintain professional relationships with younger students.
- Maintain objectivity in the relationship with students and interact with students without displaying bias or preference. Staff must be objective and impartial at all times and be seen to be so.
- As far as practical, ensure there are minimum two adults in presence when interacting with a single underage student. Where left with the responsibility of a single younger student, adults should ensure they are in an open space in view of others.
- Listen and respond to the views and concerns of younger students, particularly if they are telling you that they or another child has been abused or that they are worried about their safety/the safety of another child.
- Promote the cultural safety, participation and empowerment of:
    o   Aboriginal and Torres Strait Islander students
    o   students with culturally and/or linguistically diverse backgrounds including international students
    o   students with disability, students who are unable to live at home, and lesbian, gay, bisexual, trans and gender diverse, intersex and queer (LGBTIQ+) students
- As far as practical, not request and withhold younger students' personal items directly. If required, always request students to hand the items to you. Only take items directly from students in circumstances where there are safety concerns.
- Exercise caution when physical contact with an underage student is a necessary. All contact must be appropriate and acceptable (i.e. when assessing a student who is injured or ill may necessitate touching the student). As far as practical, adults are required to advise the younger student of what you intend doing and seek their consent.
- Record all communication or meetings with students outside classroom time in the student management system. This includes academic and student support issues.
- Respond and report appropriately where there is an incident, allegation or a suspicion is formed that a younger student is victim to a child abuse and/or another individual has committed child abuse.
- If child abuse is suspected, report and respond appropriately so the younger student(s) are safe and protected from harm as soon as possible. Phone emergency services on 000 if you believe the student is in immediate danger, followed by a report to Ozford.

5.6   Ozford prohibits all persons interacting with students in all Ozford environments to:

- Develop a relationship with any student that is, or that can be interpreted as having a personal rather than professional interest in the student, ie. grooming behaviour.

- Seek to use younger students in any way to meet the needs of adults or into personal agendas.
- Photograph or video a student except in accordance with Ozford policy or where required for duty of care purposes.
- Ignore behaviours by other adults towards students when they appear to be overly familiar or inappropriate.
- Treat a student unfavourably because of their disability, age, gender, race, culture, religion, vulnerability, sexuality or ethnicity.
- Discuss content of an intimate nature or use sexual innuendo with students, except where it occurs relevantly in the context of parental guidance, delivering the education curriculum or a therapeutic setting.
- Communicate directly with a student through personal or private contact channels (including by social media, email, instant messaging, texting etc) except where that communication is reasonable in all the circumstances, related to teaching and learning activities or where there is a safety concern or other urgent matter.
- Use information and communication technologies, such as email, mobile phones, text or instant messaging and websites to engage in behaviour that could reasonably be considered to have a negative impact on another person, cause them harm, or make them feel unsafe.
- Use Bullying or insulting behaviour, including verbal and non-verbal aggression, abusive, threatening or derogatory language and physical abuse or intimidation towards other staff or students is also unacceptable.
- impose physical punishment on a student in the course of their professional duties. Corporal punishment is not allowed at any time.
- In the Ozford environment or at other Ozford events where students are present, consume alcohol contrary to Ozford policy or take illicit drugs under any circumstances.
- Criticise another staff member in a public forum or meeting.
- Make unfounded complaints with malicious, frivolous or vexatious intent against another employee, clients, stakeholders or students.
- Breach privacy requirements by disclosing internal discussions or email contents to external parties except where reporting obligations apply.

5.7   The consequences for breaching this Child Safe Code of Conduct will be commensurate with the severity of the breach.

5.8   The consequences may range from internal school actions to the involvement of the Victoria Police and/or DHHS Child Protection.

6.   Procedure

6.1   The Executive Management team and all staff have a legal and/or moral responsibility in the prevention and reporting of child abuse and neglect. The following table identifies the roles of those who are responsible for the procedure.

Responsible for:	Who is responsible?
Development of Strategies to embed an organisational culture of child safety including seeking feedback from staff, students and their families	Executive Management Team
Development of a child safety policy framework	Executive Management Team

Responsible for:	Who is responsible?
including child safe policy, child safety code of conduct, screening, supervision, training, and other human resources policies, procedures for responding to and reporting suspected child abuse, strategies to identify and reduce or remove risks of child abuse and strategies to promote child participation and empowerment.	
Designated Child protection officer to support all staff and students with this policy	Head of Marketing, Admissions and Student Support
Ensuring the Executive Management Team and staff are appropriately screened and selected	Academic Director/Principal Head of ELICOS
Coaching staff on risks and ensuring new and existing Executive Management Team members and staff are provided with regular professional development	Executive Management Team
Complete all required professional development including in respect to cultural safety and comply with the Child safe policies and code of conduct	Executive Management Team and all staff, visitors, volunteers and students
Monitoring staff suitability for child connected work	Head of Marketing, Admissions and Student Support Academic Director/Principal
Ensuring Ozford implements the child empowerment strategies	Executive Management Team
Promptly managing the response to an allegation or disclosure and ensuring that it is taken seriously.	Executive Management Team
Encouraging students to speak up and responding appropriately to a child who makes or is affected by an allegation of child abuse.	All staff.
Reporting an incident	All staff with support from the Designated Child protection officer
Protect any child connected to alleged child abuse until the allegation is resolved.	Primary: Head of Marketing, Admissions and Student Support Alternative: Other EMT members
Monitoring school compliance with this policy.	Executive Management team including the Academic Director/Principal
Make, secure and retain records	All staff Head of Marketing, Admissions and Student Support
Reviewing this procedure	Executive Management Team

Standard 1 Culturally safe environment for Aboriginal children

6.2   Ozford will provide all staff and students with knowledge of the strengths of Aboriginal cultures, so that they can appreciate the role of culture in the wellbeing and safety of Aboriginal children and young people including:
- Awareness of the importance of encouraging and actively supporting any aboriginal person's ability to express their culture and enjoy their cultural rights.

- Equipping all members of Ozford's community to acknowledge and appreciate the strengths of Aboriginal culture and understand its importance to the wellbeing and safety of Aboriginal children and young people.
- The Equal Opportunity and Anti-Discrimination Policy and Procedure ensures that racism within Ozford is identified, confronted and not tolerated. Any instances of racism are addressed with appropriate consequences.
- Ozford will actively support and facilitate participation and inclusion within it by any Aboriginal younger students and their families.
- Ozford's policies, procedures, systems and processes together create a culturally safe and inclusive environment and meet the needs of Aboriginal younger students and their families.

Standard 2 Child safety organisational leadership, governance and culture

Child Safety Commitment Promotion

6.3   Ozford makes a public commitment to child safety. Ozford's Child Safety policies and procedures are published on the Ozford website.

Child Safety is Championed and Modelled

6.4   Ozford's child safe culture is championed and modelled by the Executive Management Team and all staff.

6.5   The Child Safe code of conduct is in this policy and the Staff Code of Conduct Policy to provide guidelines for staff on expected behavioural standards and responsibilities. All staff are informed about the policies as part of their induction.

Child Safety Risk Management

6.6   The EMT ensures that Ozford develops and implements risk management strategies as detailed in the Risk Management Framework.

6.7   The risk management process includes Child Safe risk identification, assessment, implementation of controls and a monitoring and review process to ensure the currency of the Child Safe risk management approach.

6.8   The EMT will identify and analyse child safe risk. Identifying risk involves an assessment of all Ozford environments. The process includes review of any previous incident reports.

6.9   The identified risks factors will be analysed and evaluated in terms of the possible consequences and the likelihood of the risk occurring, taking account of the increased level of risk associated with the specific nature of some activities and the vulnerability of particular groups.

6.10   The EMT will discuss control and mitigation actions required for each risk factor and allocate appropriate staff with risk oversight and management responsibility.

6.11   The outcomes from the risk management activities will be recorded in the Risk register. The Risk Register records all the risk factors that have been identified along

with the associated risks. It records how Ozford controls these risks and who has oversight of and responsibility for risk management activity.

6.12   The risk register is reported to the Executive Management team.

6.13   As effective child safe risk management strategies are dynamic and change over time as new risks arise and others may no longer be relevant, the EMT will monitor and review the risk register annually to ensure that it includes all situational child abuse risks and monitoring the effectiveness of the controls as outlined in the policy.

Standard 3 Younger students are empowered

6.14   The Student support staff, many of whom are bilingual, will provide a specific orientation session for younger students that provides information about their right to safety, information about their rights and that their participation and feedback is encouraged and will be responded to.

6.15   All students, including younger students, will be encouraged to engage in Ozford activities and build friendships in the student cohort. The importance of friendships is recognised by Ozford and where a younger student has an issue, support from peers will be encouraged to help younger students feel safe and be less isolated.

6.16   All students including, younger students, are offered access to the Anti-Discrimination and Harassment Policy and Procedure and a sexual abuse prevention program in an age-appropriate way.

6.17   All staff are provided with training to attune them to signs of harm and facilitate child-friendly ways for younger students to express their views, participate in decision-making and raise their concerns.

6.18   The Student support staff have meetings with and regularly collect feedback from younger students. Ozford provides opportunities for younger students to participate and are responsive to their contributions, thereby strengthening confidence and engagement.

6.19   The Student support staff will support, enable and encourage staff, parents and younger students to understand, identify, discuss and report child safety matters.

6.20   The Student support staff will ensure that there is respect and support younger students who disclose or are otherwise linked to suspected child abuse.

Standard 4 Families and communities are informed and involved

6.21   The EMT in developing and reviewing this policy and procedure have been sensitive to the diversity and characteristics of the school community which mainly consists of families from culturally diverse backgrounds.

6.22   Families are made aware of that Ozford publicly promotes the child safe policy and procedures on the website.

6.23   The Student support staff will seek feedback from families and the community about the child safe policies and incorporating that feedback in policy review processes so

the community have a say in the development and review of policies and practices related to child safety and wellbeing.

6.24   The Student support staff will ensure that families participate in decisions related to child safety and wellbeing which affect their child.

Standard 5 Equity is upheld and diverse needs of younger students are respected

6.25   The Executive Management Team ensure that Ozford has developed and implemented policies and procedures that are culturally safe, accessible and easy to understand and have a focus on ensuring that equity is upheld, and the diverse needs of younger students are respected. Please see:
●   Anti-Bullying and Harassment Policy and Procedure
●   Equal Opportunity and Anti-Discrimination Policy and Procedure
●   Gender Equity Policy and Procedure
●   Complaints and Appeals Policy and Procedure

Standard 6 People are suitable and supported to keep younger students safe and Standard 8 Staff are equipped to keep younger students safe

6.26   Ozford's human resource practices include child safe screening, supervision, training and other human resources practices that reduce the risk of child abuse by new and existing personnel. Please see the Human Resources Policy and Procedure.

6.27   It is a requirement that all Executive Team members, staff, volunteers, contractors, parents/guardians/carers or homestay hosts, students over the age of 18 years and any other member of Ozford interacting with underage students to formally accept in writing and adhere to the Ozford Child safe policies and procedures.

6.28   An induction and ongoing training in the Ozford Child Safe policies, Code of Conduct and Procedures is provided to Executive Team members, staff, volunteers, contractors, parents/ guardians/carers, student support provider staff, homestay hosts and any other members of Ozford.

6.29   Ozford's human resource practices include annual child staff training that includes:
●   How to effectively implement the Child Safety Policy and Procedure.
●   How to recognise indicators of child harm including harm caused by other children and young people.
●   How to respond effectively to issues of child safety and wellbeing and support colleagues who disclose harm.
●   Building a culturally safe environments for all students including younger students.
●   The obligations on information sharing and record keeping.

Standard 7 Processes for complaints and concerns are child focused.

6.30   All staff members have a moral and legal obligation and a Duty of Care to protect any child under their care from foreseeable harm. Staff must respond to any reasonable suspicion that a child has been or is at risk of being abused as set out in the Responding to and reporting allegations of suspected child abuse Policy and Procedure.

6.31   The designated child protection officer for Ozford is the Head of Marketing, Admissions and Student Support. As an alternative, the Executive Management team, including the Academic Director and Principal, are available to support staff.

6.32   All suspicions that a child has been or may be in danger of being abused will be taken seriously.

6.33   All staff are expected to be able to recognise the physical or behavioural signs of child abuse. In many circumstances the signs may be the only indication that a child is subject to abuse. When identifying child abuse, it is critical to remember that:
- the trauma associated with child abuse can significantly impact upon the wellbeing and development of a younger student.
- all concerns about the safety and wellbeing of a younger student must be acted upon as soon as practicable.

6.34   Every adult who reasonably believes that a child has been abused, whether within the school environment or not, has an obligation to report that belief to authorities. If there is a reasonable belief that a child has been, or may be at risk of being abused, the adult must act, even if the adult has not directly witnessed the child abuse or student sexual offending.

6.35   Staff must also act when a matter is reported by students, parents/legal guardians, homestay hosts, student advocates or any other person witnessing a child abuse incident. The response to reports of suspected abuse will be the same no matter how the staff member feels about the disclosure or the person or persons implicated in the disclosure.

6.36   **If a child's health and safety is in immediate danger, phone emergency services on 000.**

6.37   To report child abuse concerns about the immediate safety of a child after hours, call the After-Hours Child Protection Emergency Service: 13 12 78.

6.38   Staff must ensure immediate safety, by:
- separating the alleged victim and others involved, ensuring all parties are supervised by a school staff member;
- arranging and providing urgent medical assistance where necessary by:
  - administering first aid assistance
  - calling 000 for an ambulance and following any instructions from emergency service officers/paramedics.
  - calling 000 for urgent police assistance if the person who is alleged to have engaged in the abuse poses an immediate risk to the health and safety of any person. Staff should also be prepared to advise that the contact person at the school is the Head of Marketing, Admissions and Student Support, for future liaison with Police.

6.39   Whenever any disclosure or allegation of suspected child abuse has been made, the details will need to be appropriately recorded. In the first instance, these could take the form of notes on any form of paper available at the time to the respondent. As soon as practicable, these should be transferred to the student management system,

including in addition to the details of the disclosure or allegation, the response and action.

6.40   All records relating to a disclosure or allegation must be retained by Ozford in compliance with its Records Management Policy and Procedure.

Standard 9 Physical and online environments promote safety and wellbeing

6.41   As part of Ozford's risk management process, staff identify and develop plans to mitigate risks in the online and physical environments. Risk management plans consider risks posed by the organisational setting, activities and the physical environment.

6.42   The online environment is used in accordance with this Child Safety Policy and Procedure.

6.43   Ozford's procurement policies ensure the safety of younger students. The Younger Student and Homestay Policy and Procedure sets out the process for selecting and monitoring third party providers.

Standard 10 Child Safe practices are regularly reviewed and improved

6.44   The Executive Management Team will ensure that the implementation of this procedure is regularly reviewed and improved.
- There is review, evaluation and improvement child safe practices as part of the three-year review process.
- All Ozford complaints, concerns and safety incidents are analysed to identify causes and systemic failures to inform continuous improvement.
- There will be reporting on the findings of reviews of this procedure to all staff, the community and families, and younger students.

Standard 11 Policies and procedures document Ozford's child safe practices

6.45   This procedure documents how Ozford is safe for younger students.
- The procedure addresses the relevant aspects of the Child Safe Standards.
- The child safety procedure is fully documented and has been designed to be easy to understand.
- Best practice models and stakeholder consultation informs the development of the procedure.

6.46   The Executive Management Team members have responsibility for championing and modelling compliance with this procedure.

6.47   Staff are provided with an induction and training to ensure that they understand and implement the procedure.

6.48   This procedure has been developed with reference to the following:
- Commission for Children and Young People website resources
- Victorian Department of Education Protect website resources
- VRQA Child safety materials and resources
- CECV Child Safe Policies and resources

- Ozford College and Ozford Institute of Higher Education Child Safe Policies and Procedures
- Feedback from Ozford staff, families and students through surveys and discussions with staff.

7.   Feedback

Feedback or comments on this policy and procedure is welcomed by the Executive Management Team.

Appendix 1: Definitions

Aboriginal
The term Aboriginal is inclusive of Aboriginal and Torres Strait Islander peoples.

Child or young person
The term child or children includes both children and young people under the age of 18 years.

Child abuse
Child abuse is defined in the Child Wellbeing and
Safety Act 2005 (Vic) as including:
- a sexual offence committed against a child
- an offence committed against a child under section 49M(1) of the Crimes Act 1958 (Vic), such as grooming
- physical violence against a child
- causing serious emotional or psychological harm to a child
- serious neglect of a child

Harm is damage to the health, safety or wellbeing of a child, including as a result of child abuse by adults or the conduct of other children. It includes physical, emotional, sexual and psychological harm. Harm can arise from a single act or event and can also be cumulative, that is, arising as a result of a series of acts or events over a period of time.

Child safe culture
A child safe culture means an organisation has shared attitudes, values, policies and practices that prioritise the safety of children.

Child connected work
Work authorised by Ozford and performed by an adult in any Ozford environments where children are likely to be present or engaged.

Child safety
Child safety encompasses matters related to protecting all children from all forms of 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.

Concerns and complaints
A concern refers to any potential issue that could impact negatively on the safety and wellbeing of children. A complaint is an expression of dissatisfaction to an organisation related to one or more of the following:
- the organisation's services or dealings with individuals
- allegations of abuse or misconduct by a staff member, a volunteer or another individual associated with the organisation
- disclosures of abuse or harm made by a child
- the conduct of a child at the organisation
- the inadequate handling of a prior concern
- general concerns about the safety of a group of children or activity.

Cultural safety

Cultural safety is the positive recognition and celebration of cultures. It is more than just the absence of racism or discrimination and more than 'cultural awareness' and 'cultural sensitivity'. It empowers people and allows them to contribute and feel safe to be themselves.

Culturally and linguistically diverse
Culturally and linguistically diverse is a broad and inclusive term for communities with diverse language, ethnic background, nationality, dress, traditions, food, societal structures, art and religion characteristics.

Disclosure
A disclosure is the process by which a child conveys or attempts to convey that they are being, or have been, abused. Disclosure can be verbal, non-verbal or indicated through behaviour. A disclosure may be accidental or intentional, partial or complete and victims may disclose in different ways to different people throughout their lives.

Empowerment
Empowerment is building up children and strengthening their confidence in themselves and in an organisation. It involves equipping children with the skills and knowledge to make informed decisions and enabling them to increase control of their lives.

Families
Families means people who make up the family unit for a child. Families may be made up of a wide variety of relationships, including those who are related by blood, marriage, adoption, kinship structures or other extended family structures. Families may include people who share in the daily tasks of living or share a very close, personal relationship.

Failure to disclose sexual offence committed against child under the age of 16 years
All adults, not just professionals who work with children, have a legal obligation to report to Victoria Police where they form a reasonable belief that a sexual offence has been committed by an adult against a child under the age of 16.

The obligation applies to a person of or over the age of 18 years (whether in Victoria or elsewhere) who has information that leads the person to form a reasonable belief that a sexual offence has been committed in Victoria against a child under the age of 16 years by another person of or over the age of 18 years.

Failure to protect from a sexual offence
The Executive team members who become aware that an adult associated with the school (such as an employee, contractor, volunteer or visitor) poses a risk of sexual abuse (including through grooming) to a child under the care, of the school, must take all reasonable steps to remove or reduce that risk. This may include, for example, removing the adult from child-related work pending investigation. Failure to do so may be a criminal offence.

The Failure to protect from a sexual offence (section 49O(7) of the Crimes Act 1958 (Vic)]) applies to a person who:
- by reason of the position s/he occupies within a relevant organisation, has the power or responsibility to reduce or remove a substantial risk that a relevant child will become the victim of a sexual offence committed by a person of or over the age of 18 years who is associated with the relevant organisation; and

- knows that there is a substantial risk that the person will commit a sexual offence against a relevant child

A 'relevant' child is a child under the age of 16 who is, or may come, under the care, Ozford. The child does not need to be identified. This means that the risk is not that a particular child will become the victim of sexual abuse. Instead, the substantial risk could be posed to any child who is, or who may be in the future, under the organisation's care, supervision or authority.

Grooming
Grooming refers to predatory conduct undertaken by an adult (18 years or over) to prepare a child for sexual activity at a later time. It is a sexual offence under section 49M of the Crimes Act 1958 (Vic.) carrying a maximum 10-year term of imprisonment.

Inclusive environment
An inclusive environment:
- value all children
- respect their rights
- challenge all forms of discrimination
- understand and respond to the needs and capabilities of all children and their families, including Aboriginal children and their families
- adjust their approaches to ensure all children feel safe, welcome and can participate.

Ozford Environments
Ozford environments means any physical or virtual place made available by Ozford for use by a child for teaching, learning or Ozford activities, including:
- the campus;
- Online learning environments; and
- Other physical environments where Ozford operates or conducts activities.

Physical environments are the physical places where an organisation operates or conducts activities, such as a building, facility or space and includes physical environments operated by third parties such as student advocates and homestay accommodation.

Online environments are any technological platforms which an organisation uses or controls, such as computers, phones, websites, intranet, email, social media and video conference facilities regardless of where such platforms may be accessed by children.

Reportable Conduct
As listed in the Child Wellbeing and Safety Act 2005, "reportable conduct" include:
- sexual offences (against, with or in the presence of, a child)
- sexual misconduct (against, with or in the presence of, a child)
- physical violence (against, with or in the presence of, a child)
- behaviour that causes significant emotional or psychological harm
- significant neglect.

Sexual abuse prevention programs
Sexual abuse prevention programs refer to age appropriate programs and education delivered to children to build their knowledge and skills to understand inappropriate behaviour by adults and other children, help protect themselves from potentially abusive situations, and become aware of how to seek help in the event of abuse or attempted abuse.

Persons delivering formal sexual abuse prevention programs or education should be appropriately skilled and trained.

Staff
Staff means a person engaged by an organisation as an employee, worker, contractor, labour hire worker, officer or office holder, minister of religion or religious or pastoral leader, regardless of whether that person's role relates to children.

Volunteer
Volunteer means any person engaged by or a part of an organisation who provides a service without receiving a financial benefit, regardless of whether their role relates to children. 'Volunteers' for the purpose of the Standards includes foster carers and kinship carers. There is no minimum period of engagement to be considered a volunteer.

Younger student
A student under the age of 18 years.