

General Code of Conduct including Child safe Code of Conduct Policy

1. Rationale

This Ozford English Language Centre (Ozford) is committed to the highest standards of conduct in education, training and administration. To meet this commitment, this Code of Conduct covers all Ozford departments and aligns employee conduct with the organisational values, policies and procedures.

It clarifies the standards of behaviour that are expected of Ozford employees in the performance of their duties and provides guidance in areas where employees need to make personal and ethical decisions. This Code does not cover all situations; it sets out standards of behaviour expected and provides a broad framework that will help employees decide on an appropriate course of action when faced with an ethical issue.

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 Ozford 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 see the Child safety Policy and Procedure

4. Policy

Responsibilities and delegations

- 4.1 The Executive Management team, Head of ELICOS, Managers and ELICOS Coordinator are responsible for the effective management of the Code of Conduct.

Monitoring, evaluation and reporting requirements

- 4.2 The Executive Management team, Head of ELICOS, Managers and ELICOS Coordinator are responsible for monitoring and evaluating the operation of this policy within their area of responsibility.

General Expectation and Obligation

- 4.3 By accepting a role with Ozford, all staff have a responsibility to comply with legislation, Ozford policies, procedures, and this Code of Conduct, perform their duties effectively, and act in a manner that promotes a productive and harmonious working environment.
- 4.4 Staff are expected to engage in personal or professional conduct that upholds the reputation of Ozford; act ethically and responsibly and be accountable for their actions and decisions.

Professional Conduct and Duty of Care

- 4.5 All staff who work with students and young people have a special responsibility in presenting themselves as appropriate role models for students and young people. Modelling effective leadership and respect in their interactions with other staff, students and young people can have a profoundly positive influence on their personal and social development.
- 4.6 The objective of this Code of Conduct is to protect children and reduce any opportunities for child abuse or harm to occur.
- 4.7 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.
- 4.8 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.
- 4.9 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.
- 4.10 All staff are required to have suitable child safe clearances, ie. a Working with Children clearance, before commencing employment at Ozford.

4.11 All staff, volunteers, contractors, parents/ guardians/ carer, student support provider staff, homestay hosts and any other member of the school community must:

- Treat all students, families and other staff with respect both in all Oxford 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:
 - Aboriginal and Torres Strait Islander students
 - students with culturally and/or linguistically diverse backgrounds including international students
 - 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 Oxford.

4.12 Oxford prohibits all persons interacting with students in all Oxford 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 Oxford 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 Oxford environment or at other Oxford events where students are present, consume alcohol contrary to Oxford 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.
- 4.13 Everyone in the workplace has the responsibility to take all practical and reasonable steps- 'duty of care -' to ensure that they are protecting the health and safety of both themselves, their work colleagues and the students from risks of harm that can be reasonably predicted.
- 4.14 Duty of care to students applies during all activities and functions conducted or arranged by Oxford where students are in the care of employees. The risks associated with any activity need to be assessed and managed before the activity is undertaken. This duty may be manifested in many ways including:
- the duty to supervise the students so that they comply with rules and practices designed for their own safety and that of other students;
 - the duty to implement appropriate programmes and procedures to ensure the safety of students;
 - the duty to ensure that college buildings, equipment and facilities are safe;
 - the duty to warn students about dangerous situations or practices.

This list is not exhaustive, it is for the individual staff to comply with objectively reasonable practice.

Respect for people

- 4.15 It is important for staff to treat colleagues and students with respect. Oxford has zero tolerance to child abuse and is committed to the protection and wellbeing of all children

in its school environment. Bullying or insulting behaviour, including verbal and non-verbal aggression, abusive, threatening or derogatory language and physical abuse or intimidation towards other employees or students is also unacceptable. We promote a child safe culture where protecting students, particularly under-age students, from abuse is part of everyday thinking and practice and their voices are heard about decisions that affect their lives. Please see:

- Anti-Bullying and Harassment Policy and Procedure
- Equal Opportunity and Anti-Discrimination Policy and Procedure
- Gender Equity Policy and Procedure

- 4.16 Complaints about a staff member should be referred to their manager and, where appropriate, an Incident Form should be completed. No criticism of another staff member should be made in a public forum or meeting.
- 4.17 Staff must not 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.
- 4.18 Staff must not make unfounded complaints with malicious, frivolous or vexatious intent against another staff member, clients, stakeholders or students and young people.

Record Keeping and Reporting

- 4.19 Communication or meetings with students outside classroom time must be recorded on the relevant student management system. This includes academic and student support issues.
- 4.20 If staff suspect or become aware of a crime (other than child abuse) committed by a student, colleagues or other stakeholders, staff are required to report it to their Manager.
- 4.21 All staff must report child abuse concerns about any person that involves students as set out in the Responding to and reporting allegations of suspected child abuse Policy and Procedure.
- 4.22 All staff are required to report instances of suspected corrupt conduct, maladministration or serious and substantial waste to their immediate supervisor/manager.

Conflict of Interest

- 4.23 Staff must be objective and impartial, and be seen to be so. A conflict of interest can involve pecuniary interests or non-pecuniary interests i.e. favours, personal relationships and associations. A conflict exists when a reasonably minded and informed person would form that view.
- 4.24 Oxford employees must not enter into a sexual relationship with any student (including any adult student of Oxford). To do so raises serious questions of conflict of interests, trust, confidence, dependency, equality of treatment, and may be a criminal offence. Such relationships have a negative impact on the teaching and learning environment for other students and colleagues and carry a serious reputational risk for the person and Oxford.

- 4.25 Staff should also report situations where a superior or colleague who has an identified conflict is, or may be perceived as, unduly influencing your decision.
- 4.26 Managers or supervisors are required to develop appropriate management strategies to deal with any conflicts of interests and document their decisions and actions.

Use of signature and personal reference

- 4.27 Staff must not sign a document which you know is not true and correct.
- 4.28 Staff are not to provide written personal references for any current or former staff member on an Oxford letterhead nor use your title and position for this purpose.
- 4.29 Managers and supervisors may provide referee reports as part of an internal or external recruitment selection processes. If staff are asked to provide such a report, it is their responsibility to be honest and objective, basing their feedback on evidence that can be verified. Staff must not make false or derogatory statements about an individual.

5. Breaches of the Code of Conduct

- 5.1 Staff hold a position of trust and are accountable for their actions. Staff who fail to follow a lawful direction given by their manager will be subject to action, including investigation, as set out in the Human Resources Policy and Procedure.
- 5.2 Some serious breaches of the Code of Conduct may require immediate investigation and withdrawal from the workplace until the outcome is determined.
- 5.3 Supervisors/managers, have a responsibility to address a possible breach of the Code of Conduct by staff as soon as they become aware of it. Each case should be determined on the facts and circumstances when deciding on the appropriate action to take, including reporting of serious matters and those where staff have failed to follow a lawful direction.
- 5.4 Other staff must also report possible breaches by colleagues to their manager. If the possible breach is by their manager then it should be reported to the next in line of management. The issues to consider when deciding what action to take include:
- the seriousness of the breach
 - the likelihood of the breach occurring again
 - whether the officer has committed the breach more than once
 - the risk the breach poses to employees, students and young people or any others, and
 - whether the breach would be serious enough to warrant formal disciplinary action.
- 5.5 Actions that will apply to proven (after investigation) breaches of the Code can include management or remedial action, or disciplinary action ranging from a caution and reprimand to dismissal as set out in the Human Resources Policy and Procedure.

- 5.6 Procedural fairness requires a decision-maker to inform an employee of the allegations made against them; providing the employee an opportunity to respond, and to not have a personal interest in the outcome.

6. Feedback

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