



1. Statement of Commitment

Christ Church Grammar School is committed to ensuring the safety, welfare and wellbeing of all children and young people at the School. This is the primary focus of our care and decision-making.

Christ Church Grammar School has zero tolerance for child abuse. All allegations and safety concerns are treated very seriously and consistently with our policies and procedures. We have legal and moral obligations to contact authorities when we are concerned about a child or young person's safety, which we follow rigorously.

Christ Church Grammar School is committed to providing 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. Particular attention is paid to the cultural safety of Aboriginal children and children from culturally and/or linguistically diverse backgrounds, as well as the safety of children with a disability and those who identify as gay, lesbian, bisexual, transgender and/or intersex. Our complaints process is child-focussed and responsive to the concerns of children and young people.

Christ Church Grammar School is committed to preventing child abuse and identifying risks early, and removing and reducing these risks both in physical and online environments. We have robust human resources and recruitment practices to reduce the risk of child abuse by new and existing Council members, staff and volunteers. We are committed to regular and ongoing education and training on child safety and wellbeing for our Council members, staff and volunteers.

Christ Church Grammar School are committed to informing and involving families in child safety and wellbeing at the School.

Every person involved at Christ Church Grammar School has a responsibility to understand the important and specific role they play individually and collectively to ensure that the wellbeing and safety of all children and young people is at the forefront of all they do and every decision they make.

Christ Church Grammar School recognises the devastating impact and effects of child sexual abuse. Christ Church has joined the [National Redress Scheme](#) which offers an independent, workable and non-adversarial option for applicants and importantly ensure choice for the applicants' voice.

2. Purpose

The purpose of this policy is to:

- inform all leaders, staff and volunteers at Christ Church Grammar School of their obligations to act ethically towards children and their roles and responsibilities in ensuring the safety and well-being of children; and
- give guidance on the processes and procedures that aim to ensure children's safety and well-being across all areas of the School's work.

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3. Scope

This policy applies to all people who conduct work for Christ Church Grammar School in a paid or unpaid capacity including, but not limited to: Council members, Executive leadership, teaching and non-teaching staff, students on placement, volunteers, interns, trainees, contractors and consultants; and for all activities in which the School is involved that result in or relate to contact with children and young people.

4. Roles and responsibilities

The **School Council** ensures that child safe practices are addressed at a strategic level and is responsible for monitoring compliance with all aspects of this Child Safety and Wellbeing Policy.

The **Principal** ensures that child safety is prioritised at a strategic and operational level and is responsible for implementing and ensuring compliance with all aspects of this Child Safety and Wellbeing Policy.

School supervisors are responsible for ensuring that contractors, consultants, students on placement and volunteers whom they supervise or manage have read this policy and carry out their duties in accordance with this policy and related documents.

Child Safety Officers are responsible for championing child safety throughout the School and for supporting staff in child safe practices in accordance with this policy and related documents.

School supervisors are responsible for ensuring that contractors, consultants, students on placement and volunteers whom they supervise or manage have read this policy and carry out their duties in accordance with this policy and related documents.

All people, as defined by the Scope of this policy, who conduct work for Christ Church Grammar School in a paid or unpaid capacity are responsible for contributing to achieving a child safe environment. They are responsible for:

- taking all actions and making decisions based on the best interests of the child or young person;
- applying child safe principles;
- complying with the School's policies and procedures relevant to their position;
- adhering to the School's Code of Conduct relevant to their role; and
- reporting all child safety concerns, as per the reporting procedures under relevant policies and procedures. All suspected or alleged child abuse must be reported to the appropriate authorities.

Failure to comply with this policy may result in disciplinary action, including potential termination of the person's employment or engagement with the School.

5. Definition of child abuse

A common understanding about the nature and impact of child abuse informs Christ Church Grammar School's response to child safety. Council members, executive leadership, staff and volunteers must be aware of the types and indicators of child abuse, and the impact of child abuse and neglect on the healthy development of children and young people.

The abuse of children and young people is highly complex in nature with multiple forms of abuse often co-existing. Abuse can be the following:

- physical abuse

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- emotional abuse
- neglect
- sexual abuse
- sexual exploitation
- sexually harmful behaviours in children
- exposure to family violence

A summary of each abuse type can be found at Appendix A.

There are many indicators of child abuse and neglect. The presence of a single indicator, or even several indicators, does not mean that abuse or neglect has occurred. However, the occurrence of an indicator or multiple indicators should alert staff and volunteers to the possibility of child abuse and neglect. Equally, abuse and neglect may occur without the presence of obvious indicators (e.g. in cases of emotional abuse), so those working for the School should remain open and aware in assessing risk to a child or young person. Observable indicators of abuse may include:

- Physical abuse – bruises, burns, sprains or fractures;
- Sexual abuse and exploitation – displaying sexualised behaviour, sexually transmitted infections, or unexplained gifts or money;
- Emotional abuse – developmental delays, withdrawn, or anxious; and
- Neglect – malnutrition, poor hygiene, and stealing food.

A detailed list of abuse and neglect indicators is provided in Appendix B.

Bullying and harassment are also forms of abuse. They will not be tolerated in our school community and will be treated seriously.

Bullying and harassment are not just about the student engaging in the bullying and the person being victimised. These behaviours are part of a wider social context and require policy and procedures that include both preventative measures and effective intervention strategies.

The School's approach to bullying and harassment can be found in the *Supporting Positive Relationships – Addressing Bullying and Harassment* policy and procedures.

6. Policy statements

6.1 Principles

This policy is underpinned by the [National Principles for Child Safe Organisations](#) developed by the Australian Human Rights Commission out of the findings of Royal Commission into Institutional Responses to Child Sexual Abuse.

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

- take a preventative, proactive and participatory approach to child safety;
- value and empower children and young people to participate in decisions which affect their lives;
- respect diversity in cultures and child rearing practices while keeping child safety paramount;

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- engage only the most suitable people to work with children and young people, and have high quality staff and volunteer supervision and professional development;
- provide written guidance on appropriate conduct and behaviour towards children and young people;
- foster a culture of openness that supports all persons to safely disclose risks of harm to children and young people;
- ensure children and young people know who to talk with if they are worried or are feeling unsafe, and that they are comfortable and encouraged to raise such issues;
- report suspected abuse, neglect or mistreatment promptly to the appropriate authorities;
- share information appropriately and lawfully with other organisations where the safety and wellbeing of children is at risk; and
- value the input of and communicate regularly with families and carers.

6.2 Child safe reporting

Christ Church Grammar School has zero tolerance for child abuse. All allegations and safety concerns must be treated very seriously and in a manner consistent with the School's policies and procedures. The School has legal and moral obligations to contact authorities when we are concerned about a child or young person's safety.

Teachers and boarding staff are key figures in the identification of child abuse and neglect through personal observation or disclosure by the student concerned or a friend. Staff members have a duty of care to take the necessary action to ensure a student is protected from further harm but it is not the staff member's role to conduct a details investigation or to confront the suspected perpetrator or to intervene with the child's family. There is no need to prove that a child or young person has been harmed. This is the responsibility of specialist child protection workers and/or WA Police.

All child safety concerns and incidents must be recorded using the Incident/Injury Report form on ERMOnline, and records kept in accordance with the School's *Records Management Policy*.

All child safety concerns reported to the Principal or Chair of Council must be reviewed by the Critical Incident Management Team.

In addition, it is a legal requirement in Western Australia for certain occupations, including teachers, nurses and boarding supervisors, to report all reasonable beliefs of child *sexual* abuse to the Department of Communities – Child Protection and Family Support. This is known as Mandatory Reporting. Teaching, nursing and boarding staff at the School are required to familiarise themselves with the detail contained on the government's Mandatory Reporting website www.mandatoryreporting.dcp.wa.gov.au and undergo annual training on their mandatory reporting obligations.

Refer to the *Child Safety and Wellbeing Reporting Obligations Procedure* for further guidance on reporting child safety concerns.

6.3 Child safe employment

The duties and responsibilities required by staff to safeguard children and young people must be detailed in all Duty Statements, job advertisements and employment contracts.

Child safety questions must be included in the interviews and must be in reference checks prior to employment offers being made.

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All new employees must obtain a [National Police Certificate](#) and a [Working with Children \(WWC\) Check](#) prior to commencing their employment at the School, copies of which are kept on the employee's file. In particular, the following offending history would disqualify the prospective employee from employment at the School:

- any conviction as an adult for any offence involving children and/or violence;
- any criminal conviction for fraud or similar; and
- any finding of negligence or serious incompetence in a similar role.

The School reserves the right to periodically require staff members to undergo further Police checks. In the event a staff member refuses to undergo any further Police checks, or relevant criminal activity is discovered as a result of such further Police checks, the School reserves the right to terminate the staff member's employment without notice.

Teaching staff must present a current copy of their [Teacher Registration Board of Western Australia \(TRBWA\)](#) registration documentation to the School.

On receipt of a copy of the new staff member's WWC card and TRBWA registration documentation, the Director of Staffing will check the validity of the documentation and register the new staff member's WWC card and TRBWA registration against the School. The School maintains a register to track the validity of staff members' WWC card and TRBWA registration. This register is automatically generated every Monday morning and emailed to the:

- Director of Staffing,
- Executive Assistant to the Director of Staffing and
- Executive Assistant to the Director of Finance

to check and remind staff when renewal is required.

All volunteers must obtain a National Police Certificate and read and sign the School's Volunteer Code of Conduct. All volunteers must have a valid WWC Check in accordance with the *Working with Children (Criminal Record Checking) Act 2004*. In certain circumstances under legislation, parent volunteers may be exempt from applying for a WWC Check.

While employed at the School, staff must ensure they renew their WWC card and TRBWA registrations before they expire and must have a valid WWC card and TRBWA registration at all times.

All Council members, executive leadership, teaching and non-teaching staff, students on placement, volunteers, interns, trainees, contractors and consultants must participate in the relevant induction process for their role, which includes their obligations under this policy, the applicable Code of Conduct and other child safety-related policies and procedures.

6.4 Child safe training, supervision and performance management

Christ Church Grammar School promotes a culture of life-long learning and provides ongoing support for teachers and support staff to accommodate professional development to enhance professional knowledge, practice and engagement.

All staff must participate in annual professional learning on the recognition of grooming and child abuse, appropriate prevention strategies, Staff Code of Conduct, their mandatory reporting obligations and all school policies and procedures that aim to ensure child safety and wellbeing. The School requires that staff complete a number of activity points in professional development each year (pro-rata according to their employment type).

Professional development requirements form part of performance management and are documented in annual or triennial review documents.

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6.5 Record keeping

The School will:

- Create and keep full and accurate records relevant to child safety in the best interests of children and is an integral part of leadership, governance and culture;
- Create records for all incidents, response and decisions affecting child safety;
- Maintain and appropriately store the records relevant to child safety. Records related to child sexual abuse that has occurred or is alleged to have occurred, will be maintained and stored for a minimum of 45 years;
- Only dispose of records relevant to child safety in accordance with legal requirements, or the School's Document Management policy if no legal requirements exist; and
- Fully recognise the individuals' rights to access, amend or annotate records about themselves.

6.6 Complaints and concerns

The School welcomes suggestions and feedback from parents, guardians and students. All complaints will be treated as constructive suggestions and will be used to improve processes and standards. All concerns will be treated very seriously and with consistency. We will always give priority to any complaints involving the safety, welfare and well-being of students. The School is committed to ensuring our complaints process is child-friendly and that students feel respected, valued, listened and responded to.

All our staff, including support staff and volunteers, have been trained to take children and young people seriously when they raise a matter of concern, and that the matter, no matter how trivial, is dealt with respectfully and in accordance with the School's policy and procedures. All staff have been appropriately and adequately trained to manage complaints related to child safety matters.

At the start of each school year, the complaints process must be explained to students, using age-appropriate language covering, but not limited to, their rights to raise a concern or complaint, who they can speak to, how to raise a complaint and how complaints are handled.

A student may make the complaint themselves, but also has the option of choosing someone, with whom they feel comfortable, to accompany them or to complain on their behalf.

Refer to the [Complaints Policy and Procedures](#) for further guidance.

6.7 Healing historical harm

The School recognises the devastating impacts and effects of child sexual abuse and supports a system that allows applicants of child sexual abuse to seek redress/compensation.

6.7.1 Redress Framework

The National Redress Scheme started on 1 July 2018 and will run for 10 years. In March 2019, the School joined the [National Redress Scheme](#) which offers an independent, workable and non-adversarial option for applicants and importantly ensure choice for the applicant's voice.

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6.7.2 Applicant Liaison Coordinator

In 2019 the School created the role of Applicant Liaison Coordinator for anyone in the School community who would like counselling or support about issues of child sexual abuse and/or historical harm. Registered Psychologists can be contacted between 9.00am and 3.00pm local time Monday to Friday.

7. Review

This policy, and related School policies and procedures, will be reviewed every second year and following significant incidents if they occur. We will ensure that families, children and young people have the opportunity to contribute to the review process.

Where possible, we will do our best to work with local Aboriginal communities, culturally and/or linguistically diverse communities, people with a disability and/or people regardless of their sexual orientation, gender identity or intersex status.

This policy was endorsed by the School Council at their meeting on 9 February 2021. All significant changes to this policy will require endorsement by the School Council.

8. Relevant legislation and standards

Working with Children (Criminal Record Checking) Act 2004

The Working with Children Check is a compulsory employment screening strategy in Western Australia for people who engage in certain paid or unpaid work with children, described as “child-related work” under the Working with Children (Criminal Record Checking) Act 2004. The WWC Check involves the ongoing collection and assessment of information that is relevant to whether a child may be exposed to a risk of harm should a person engage in child-related work.

Children and Community Services Amendment (Reporting Sexual Abuse of Children) Act 2008

On the 1st January 2009, the Western Australian government introduced legislation that requires various occupations, including teachers, to report on child sexual abuse. This legislation is the Children and Community Services Amendment (Reporting Sexual Abuse of Children) Act 2008 and is an amendment to the Children and Community Services Act 2004.

As of 1 January 2016, supervisors of boarding facilities are mandatory reporters under the Children and Community Services Act 2004. A boarding supervisor is a member of the boarding staff who holds an office or position at a school's boarding facility, the duties of which include the supervision of children living at the facility.

Registration Standards for Non-Government Schools

Non-government schools in Western Australia are required to be registered by the Director General of the Department of Education. Registration provides assurance to parents and the community that non-government schools meet the standards determined by the Minister and other requirements specified in Part 4 of the School Education Act 1999 and the School Education Regulations 2000.

National Principles for Child Safe Organisations – Australian Human Rights Commission

The National Principles for Child Safe Organisations reflect the ten child safe standards recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse, with a broader scope that goes beyond sexual abuse to cover other forms of potential harm. The National Principles define a child safe organisation as one that creates a culture, adopts strategies and takes action to promote child wellbeing and prevent harm to children and young people.

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The United Nations Convention on the Rights of the Child

Under the Convention on the Rights of the Child, children and young people, like adults, possess human rights. They also have the right to special protection because of their vulnerability to exploitation and abuse. Australia became a signatory to the Convention in 1990.

9. Related School Policies and Procedures

- Allegations of Misconduct Against Employees policy (internal document)
- Allegations of Misconduct Against Employees procedures (internal document)
- Child Safety & Wellbeing Policy
- Child Safety & Wellbeing Reporting Obligations Procedure
- Complaints Policy and procedures
- Critical Incident management policy (internal document)
- Critical Incident management procedures (internal document)
- Duty of care guidelines (internal document)
- Disability Discrimination Act and the Disability Standards for Education (internal document)
- Disability Action Plan (internal document)
- ICT acceptable use policy (staff) (internal document)
- ICT acceptable use policy and electronic communications guidelines (students)
- Staff Code of Conduct
- Senior School Student Code of Conduct
- Pre-Kindergarten to Year 2 Code of Conduct
- Year 3 to 6 Code of Conduct
- Parent Code of Conduct
- Professional learning agreement policy (internal document)
- Protective Behaviours Curriculum policy
- Social networking acceptable use policy (internal document)
- Students with additional needs policy and procedures
- Sport Coaches Code of Conduct
- Recruitment & Selection policy (internal document)

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- Recruitment & Selection procedure (internal document)
- Records Management Policy (internal document)
- Risk Management policy(internal document)
- Sexual harassment policy (internal document)
- Managing student behaviour guidelines (Senior School)
- Managing student behaviour guidelines (Preparatory School)
- Supporting positive relationships – addressing bullying and harassment policy and procedures
- Volunteer Code of Conduct

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Appendix A Forms of Abuse

Emotional abuse – This may involve a child being repeatedly rejected, verbally abused or put down. It may involve children being frightened by threats or subjected to continual coldness. Emotional abuse can diminish a child’s sense of identity, dignity and self-worth, resulting in damage to the child’s social, intellectual or emotional development. It does not leave physical injuries and its ongoing nature usually means there is no crisis which would precipitate easy identification. For this reason, emotional abuse is the most hidden and underestimated form of child maltreatment despite the impact being chronic and debilitating. Stakeholders therefore need to be particularly aware of the behavioural indicators of emotional abuse and astute in any assessment of risk.

Physical abuse – Occurs when a person intentionally or recklessly uses physical force against or in the presence of a child without their consent, which causes or could cause harm to that child. It can also occur when someone intentionally or recklessly causes a child to believe that physical force is about to be used against them without their consent. Physical abuse can take the form of punching, beating, shaking or otherwise harming a child and also includes behaviours, such as words or gestures that leads a child to believe they are about to experience physical abuse.

Neglect– Involves the failure on the part of the caregiver to meet a child’s basic needs, such as providing adequate nutrition, clothing, supervision, and hygiene and medical attention to the extent that the child’s health and development are, or are likely to be, placed at risk. Neglect also includes a failure to meet a child’s social and emotional needs, for example a child may receive no emotional warmth, nurture and affection with the caregiver unattuned or disinterested in the child’s needs.

Sexual abuse – Occurs when a person uses power, force or authority to involve a child in any form of sexual activity. Sexual offences include: touching or fondling; obscene or suggestive phone calls/texts; exhibitionism and voyeurism; showing children or involving them in the production of child exploitation material; and penetration. Sexual misconduct is another type of sexual abuse and includes a variety of sexualised behaviours toward children. Examples of sexual misconduct include inappropriate comments of a sexual nature, and behaviour that crosses a professional boundary such as establishing (or seeking to establish) an overly familiar relationship with a child.

Sexual exploitation – Is a specific form of sexual abuse where children and young people, by virtue of their age and development, are unable to give informed consent to sexual activity. Sexual exploitation of children takes different forms. It can include children being involved in sexually exploitive relationships, exposing a child to pornography, receiving money, goods, drugs or favours in exchange for sex, or being exploited in sex work. In all cases, those exploiting the children have power over them due to the child’s age, gender, physical strength, economic or other resources such as access to drugs or gifts.

Sexually harmful behaviour in children – Sexually harmful behaviour involves a child (17 years of age or younger) engaging in sexual activity that is either unwanted or where, due to the nature of the situation, the other party is not capable of giving consent (e.g. children who are younger or who have cognitive impairment). In children under 10 years of age, such behaviour is usually referred to as *sexually problematic behaviour*.

Grooming– Refers to actions deliberately undertaken by an adult, adolescent or child to befriend and influence a child (and in some circumstances members of the child’s family) with the intention of achieving the criminal objective of sexual activity with children. Grooming is generally subtle and ambiguous. Schools therefore need to be vigilant in reporting any breach of policy, code of conduct or generalised concern to enable patterns of behaviour to be identified early and potential abuse prevented. Grooming behaviours can include the following:

- Sharing secrets with a child;
- Engaging inappropriately with a child on social media;
- Non-sexual touching such as tickling, hugging or rough play;
- Allowing the child to break the rules;
- Spending time with the child away from protective adults; and

- Favouritism toward a child through giving gifts or money.

Exposure to Family Violence – The nature of children’s exposure to family violence ranges from witnessing (including seeing and overhearing violence and witnessing its effects) to being directly involved. Children were previously seen as “silent witnesses” to domestic and family violence; however, a now substantial body of research indicates children may be involved in domestic and family violence in a range of ways, including being forced to watch or participate in assaults or intervening to stop the violence occurring.

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Appendix B Indicators of Abuse

Abuse type	Indicators
<p>Physical</p>	<ul style="list-style-type: none"> • Disclosure of abuse • Bruises, burns, sprains, dislocations, bites, cuts. • Pressure marks from fingers • Bite marks • Location and extent of injury do not fit the explanation given • Fractured bones, especially in an infant where a fracture is unlikely to occur accidentally • Poisoning • Internal injuries • Showing wariness or distrust of adults. • Seasonally inappropriate clothing (to hide bruising or other injury) • Demonstrating fear of parents and of going home; running away • Becoming fearful when other children cry or shout • Being excessively friendly to strangers • Being very passive and compliant
<p>Emotional</p>	<ul style="list-style-type: none"> • Disclosure of abuse • Developmental delays • Displaying low self esteem • Tending to be withdrawn, passive, tearful • Displaying aggressive or demanding behaviour • Being highly anxious • Displaying difficulties in relating to adults and peers • Avoiding home or running away • Sleep disturbances • Regression ie acting like a much younger child, e.g. soiling, wetting pants

<p>Sexual abuse and exploitation</p>	<ul style="list-style-type: none"> • Disclosure of abuse • Complaining of headaches or stomach pains • Experiencing problems with schoolwork • Sexually transmitted infections • Genital injuries • Bleeding • Pregnancy • Displaying sexual behaviour or knowledge which is unusual for the child's age • Excessive masturbation which doesn't respond to boundaries • Experiencing difficulties in sleeping • Persistent soiling or bed wetting • Having difficulties in relating to adults and peers • Unexplained absences, unexplained gifts or money are often signs of sexual exploitation
<p>Neglect</p>	<ul style="list-style-type: none"> • Disclosure of neglect • Frequent hunger • Malnutrition • Poor hygiene • Inappropriate clothing, e.g. Summer clothes in winter • Left unsupervised for long periods • Medical needs not attended to; ill more than average • Stealing food • Staying at school outside school hours • Often being tired, falling asleep in class • Abusing alcohol or drugs • Displaying aggressive behaviour • Not getting on well with peers

<p>Family violence</p>	<ul style="list-style-type: none"> • Disclosure of family violence • Physical injuries • Concentration difficulties • Adjustment difficulties • Anxious or nervous • Depression • Fear of a parent or partner of parent • Isolation from friends and family • Unusual absences • Fear of conflict • Violent outbursts • Aggressive language
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