

C3 CHILD SAFETY

POLICY AND PROCEDURES

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POLICY

1. STATEMENT OF PURPOSE

Pulteney Grammar School is committed to the safety and wellbeing of all children and young people in our school. We support the rights of the child and will act without hesitation to ensure a child safe environment is maintained at all times.

Pulteney Grammar School has zero tolerance for harm or risk of harm to a child or young person. Everyone working at Pulteney Grammar School is responsible for the wellbeing and protection of children and young people within our care and reporting information about suspected child harm or risk of harm.

We also support the rights and wellbeing of our Staff and Volunteers and encourage their active participation in creating and maintaining a child safe environment for all members of the School community.

We take a proactive, preventative, and participatory approach to protecting children and young people through:

- the on-going development of a positive, child safe culture;
- the development, implementation and monitoring of rigorous policies and procedures;
- seeking to ensure that everyone is aware of their responsibilities, vigilant and, if required, prepared to respond in an appropriate and timely manner.

Pulteney Grammar School is committed to the *National Principles for Child Safe Organisations* which state that a child safe organisation consciously and systematically:

- creates an environment where children's safety and wellbeing is the centre of thought, values and actions
- places emphasis on genuine engagement with, and valuing of children
- creates conditions that reduce the likelihood of harm to children and young people
- creates conditions that increase the likelihood of identifying any harm
- responds to any concerns, disclosures, allegations or suspicions.

2. SCOPE

Child protection is a shared responsibility between Pulteney Grammar School, all employees, workers, contractors, volunteers, associates and members of the Pulteney Grammar school community. This policy applies to all staff, volunteers, parents/carers, children and young people and other individuals involved with the school, whether on a regular or occasional basis. It applies:

- on the school premises
- at functions, excursions, trips or camps organised by the school
- when members of the school community are representing the school.

This policy will be made available to staff, volunteers, students and parents of Pulteney Grammar School.

The attention of parents, children and young people will be drawn to the Policy at least twice each year via the School's newsletter, *Pulteney Review*. A PDF copy of the Pulteney Grammar School Child Protection Policy is available from the receptions of each of the Sub Schools.

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The policy will be directed to the attention of all staff via the School's Policies page on the School's Intranet (Catapult), and in particular, on the first Staff Professional Development Day of each school year for school staff (including Early Learning Centre staff), the first staff meeting of the year for Out of School Hours Care Staff, and to all new staff at the time of appointment.

3. RESPONSIBILITIES

Various staff members of Pulteney Grammar School will have different responsibilities regarding Child Protection, including requirements relating to mandatory reporting.

The Pulteney Grammar School Board

Each member of the School Board is required to ensure that a culture of child safety is embedded at Pulteney Grammar School through the provision of appropriate resources to allow the School's Child Protection Policy to be effectively implemented within the school and delegate to and hold accountable the Principal and Executive Team for effective implementation and communication via processes of monitoring and review.

The Principal

The Principal is responsible for the following:

- dealing with and investigating reports of child abuse;
- ensuring that all staff, volunteers, contractors are aware of relevant laws, school policies and procedures and the school's code of conduct;
- ensuring that all adults within the Pulteney Grammar School community are aware of their obligation to report suspected sexual abuse of a child in accordance with these policies and procedures and aware of the school's code of conduct;
- providing support for staff, volunteers, contractors in undertaking their child protection responsibilities.
- promoting Child Protection wherever possible, and ensuring that Child Protection is included regularly in staff training;
- ensuring that Child Protection is included in the school's curriculum;
- when a mandatory report has been made, assisting staff to complete site documentation, and then sign the mandatory notification record and ensure this is stored correctly;
- ensuring that students and staff receive adequate support if involved in a child abuse situation;
- ensuring that staff are supported when making a mandatory report; and
- ensuring that staff and volunteers have completed Working with Children Checks and RAN-EC/RRHAN-EC training, and that third parties have completed Working with Children Checks where required.

Staff

All staff of Pulteney Grammar School are responsible for the following:

- share the responsibility for the prevention and detection of child abuse and must:
- familiarise themselves with the relevant laws, the code of conduct and Pulteney Grammar School's policy and procedures in relation to child protection and comply with all requirements;
- report any reasonable belief that a child's safety is at risk to the relevant authorities and fulfil their obligations as mandatory reporters;
- report any suspicion that a child's safety may be at risk to their supervisor (or, if their supervisor is involved in the suspicion, to a responsible person in the organisation); and

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- provide an environment that is support of all children's emotional and physical safety;
- reporting any suspected abuse to the Child Abuse Report Line (CARL) on 13 14 78;
- advising the Principal when a report is being/has been made (unless the report involves the Principal in which case it should be reported to a senior leader);
- when concerning behaviour has been observed, the staff member who witnessed it must alert an appropriate senior staff member; and
- taking action if children and young people have disclosed information about inappropriate behaviours of other adults.

4. THE NATIONAL PRINCIPLES FOR CHILD SAFE ORGANISATIONS

National Principles for Child Safe Organisations

Pulteney Grammar School's Child Protection Policy is a clear and accessible statement of intent in regard to the School's commitment to being a Child Safe School through promoting the wellbeing of children and young people and safeguarding all children and young people from harm.

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

The policy is underpinned by the guiding principles of the Australian Student Wellbeing Framework and addresses the requirements of the National Principles for Child Safe Organisations (2021), previously referred to as the Child Safe Standards as recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse.

5. DEFINITIONS

5.1 **Children and young people** refers to children from birth to 18.

Students aged 18 and over may attend school but are legally considered adults. There are no legally mandated reporting requirements for any person over the age of 18 years. However, these students can be considered potentially vulnerable and in need of specialist services and schools do owe a duty of care towards them.

5.2 **Child abuse** means all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial (e.g. for financial gain) or other exploitation of a child and includes any actions that result in actual or potential harm to a

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child.

5.3 **Risk of Harm** may be categorised as follows:

- 5.3.1 **Physical Abuse** occurs when a child or young person has experienced severe and/or persistent ill-treatment. It can include injuries such as bruises, cuts, burns or fractures caused by a range of acts including beating, shaking, illicit administration of alcohol and other drugs, attempted suffocation, excessive discipline or physical punishment.
- 5.3.2 **Sexual Abuse** is when a child or young person has been exposed or subjected to sexual behaviours that are exploitative and/or inappropriate to his/her age and developmental level. Examples include sexual penetration, inappropriate touching, and exposure to sexual acts or pornographic materials.
- 5.3.3 **Emotional / Psychological Abuse** is the sustained, repetitive, inappropriate ill-treatment of a child or young person through behaviours including threatening, isolating, neglecting, discrediting, belittling, misleading, disregarding, ignoring and inappropriate encouraging. Children are likely to feel worthless, flawed, unloved, unwanted, endangered or only of value in meeting another's needs.
- 5.3.4 **Neglect** exists when a parent or caregiver consistently fails to provide a child or young person with an acceptable minimum standard of care to a severe and/or persistent extent. This includes the basic necessities of life, shelter, healthy food, suitable clothing, medical care, emotional security and inappropriate supervision.

6. CODE OF CONDUCT, PROFESSIONAL BOUNDARIES AND EXPECTATIONS OF STAFF AND VOLUNTEERS

Pulteney Grammar School has developed a Staff Code of Conduct (D18) to specify standards of conduct and care, professional boundaries, ethical behaviour and unacceptable behaviour when working and interacting with children. This is based on Protective Practices for staff in their interactions with children and young people. The aim is to provide guidance to staff on how best to support students, and how to avoid or manage difficult situations. The Code of Conduct applies to all staff and breaches of the Code may result in disciplinary action or, in the case of serious breaches, dismissal.

Compulsory behaviour

- Staff and volunteers must comply with the school's Child Protection Policy;
- Staff and volunteers must behave as a positive role model to students;
- Staff and volunteers must promote the safety, welfare and wellbeing of students;
- Staff and volunteers must promote the safety, participation and empowerment of students with a disability;
- Suspicions of child abuse must be reported to the Child Abuse Report Line (CARL – 13 14 78) and to the Principal, or to Deputy Principal if the situation involves the Principal;
- Concerning behaviour or breaches of the Child Protection Code of Conduct must be reported to the Principal, or to Deputy Principal if the breach concerns the Principal. The

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Principal (or other person) will be responsible for developing an appropriate plan of action and ensuring it is followed;

- Students must be treated with respect and encouraged to speak up and participate;
- Actions must be undertaken transparently and with the knowledge and consent of the Principal;
- When working one-on-one with children and young people, actions must be:
 - Public – ensure the environment is visible, public and busy. Use the site's authorised ICT systems;
 - Authorised – parents must be informed and have given consent and the activity must be authorised by the Principal;
 - Timely – the activity must be a legitimate part of your role, support must be provided within normal work hours where possible, and sessions should be concise and not unnecessarily prolonged; and
 - Purposeful – the activity should address or be linked to an identified wellbeing and/or learning need of the child or young person;
- Manage challenging behaviour through non-physical intervention, such as directing other children and young people to move away from the situation, talking to the child, directing the child or young person to a safe place, and directing other children to a safe place. Physical restraint should only be used as a last resort and must only be used when the safety of a child or young person or adult is threatened. Physical restraint must not be used as a response to property destruction, disruption to the education or care activity, refusal to comply, verbal threats, leaving an education care setting, or a need to maintain good order unless someone's safety is clearly threatened;
- Become as familiar as possible with the values of various cultural groups enrolled at our school, as different cultures have different attitudes and traditions surrounding the concept of appropriate touch; and
- Ensure that the privacy of students is respected, and that personal information is managed in accordance with the school's Privacy Policy (C13).

Unacceptable behaviour:

- Failure to act when an allegation of child abuse is made, including failure to report the allegation;
- Failure to intervene in situations where sexual harassment is occurring;
- Inappropriate comments about a child or young person's appearance, including excessive flattering comments;
- Inappropriate comments, conversations or enquiries of a sexual nature;
- Use of inappropriate nicknames;
- Obscene gestures and/or language;
- Jokes or innuendo of a sexual nature;
- Facilitating/permitting access to pornographic material;
- Facilitating/permitting access to sexually explicit material that is not part of an endorsed curriculum;
- Correspondence of a personal nature via any medium (including phone, text message, letters, email, social media, internet posts) that is unrelated to the staff member's role. This

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does not include class cards or bereavement cards;

- Discussing personal lifestyle details or your opinions, other staff or children and young people unless directly relevant to the learning topic and with the individual's consent;
- Corporal punishment (for example, physical discipline or smacking);
- Inappropriate use of physical restraint/restrictive practices;
- Unwarranted or unwanted touching of a child or young person personally or with objects (for example, pencil or ruler);
- Initiating, permitting or requesting inappropriate or unnecessary physical contact with a child or young person (for example, massage, kisses, tickling games) or facilitating situations that unnecessarily result in close physical contact with a child or young person;
- Inviting/allowing/encouraging children and young people to attend the staff member's home;
- Attending children and young people's homes or their social gatherings;
- Being alone with a child or young person outside a staff member's responsibilities;
- Entering change rooms or toilets occupied by children or young people when supervision is not required or appropriate;
- Transporting a child or young person unaccompanied;
- Using toilet facilities allocated to children and young people;
- Undressing using facilities allocated to children and young people, or in their presence;
- Tutoring (outside the school's directions or knowledge);
- Giving personal gifts or special favours;
- Singling the same children and young people out for special duties and responsibilities;
- Privately giving money and/or gifts to individual children/young people;
- Photographing, audio recording or filming children or young people via any medium when not authorised by the site leader to do so and without required parental consent;
- Using personal rather than school equipment for approved activities, unless authorised by the site leader to do so;
- Correspondence or communication (via any medium) to or from children and young people where a violation of professional boundaries is indicated and where the correspondence has not been provided to the Principal/leader via the staff member;
- Still/moving images or audio recordings of children and young people on personal equipment or kept in personal locations such as car or home that have not been authorised by the Principal;
- Uploading or publishing still/moving images or audio recordings of children and young people to any location, without parental and site leader's consent;
- Creating or using private chat rooms; and
- Filming/recording students for the use of behaviour training/modification without obtaining prior permission from the Principal and parents.

The guidelines are not exhaustive, and given that sometimes "grey areas" may occur, it is expected that all staff (no matter their age or experience) use their own good judgment, think very carefully of the implications and potential consequences of engaging in certain behaviours with students, and always err on the side of caution.

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When unsure about whether professional boundaries are being, or have been, breached, ask yourself:

- Would I modify my behaviour if a colleague was present?
- How would I feel about explaining my actions at a staff meeting?
- Am I sharing information for the student's benefit, or for my benefit?
- Am I dealing with this student differently from others in similar circumstances?
- Is my language or demeanor different from normal when dealing with this particular student?

Intimate Relationships

Staff must not initiate or develop a relationship with any student that is or can be misinterpreted as having a romantic or sexual, rather than professional basis. This is regardless of whether the relationship is consensual, non-consensual or condoned by parents / guardians.

The professional relationship of staff and students may be breached by:

- flirtatious behaviour or dating;
- development of an intimate personal relationship;
- sexual relations;
- the use of sexual innuendo, inappropriate language and/or material with students;
- unwarranted and inappropriate touching;
- unwarranted and inappropriate filming or photography;
- deliberate exposure to sexual behaviour of others (e.g. pornography);
- having intimate contact without a valid context via written or electronic means (e.g. email, letters, telephone, text messages, social media sites or chatrooms);
- going out, whether alone or in company, to social events such as the movies or dinner; and
- exchanging gifts of a personal nature that encourages the formation of an intimate relationship.

Staff should also be aware that developing or encouraging romantic or sexual relationships with recent former students (over 18 years of age) may violate professional boundaries and are strongly discouraged from doing so.

The imbalance of power and authority that exists in the staff/student relationship does not suddenly disappear after the student finishes their schooling. Staff should not assume that they will be protected from disciplinary action by claiming that a relationship began only after the student left the School as there may be a reasonable belief that the emotional intimacy of the relationship developed while the staff/student relationship existed.

Personal Relationships

Staff must not initiate or develop a relationship with any student that is or can be perceived or misinterpreted as having a personal rather than professional element. This is regardless of whether the relationship is consensual, non-consensual or condoned by parents or guardians.

It is the student's perception of staff behaviour and not the intention of the staff member that is important.

The professional relationship of staff and students may be compromised by:

- attending parties or socialising with students outside of organised School events (without

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parental/guardian permission);

- sharing personal details about their private lives with students; or
- meeting with students outside of school hours without permission from the School.

Staff must recognise at all times that their role is not to be a “friend” or “parent” to a student.

Electronic Communications between Staff and Students

Electronic communication between staff and students should be in keeping with the nature of the relationship between staff and students and remain professional. The School recommends that staff do not provide students with their mobile telephone number and instead choose to utilise alternative forms of communication such as e-mail or CANVAS. In circumstances where a telephone number is required for reasons of safety, the School will issue staff with a school mobile telephone to use.

As a guide to online communication, the School believes that appropriate professional distance be established and maintained in the following manners:

- all use of technology should be for educational purposes or for the organisation of co-curricular activities;
- all email communication between staff and students should be via the School email system and reflect a professional staff/student relationship;
- staff and student contact through social media should be limited to platforms condoned and approved by the School and for educative purposes only;
- staff should not exchange personal pictures with a student; and
- any student personal contact numbers or other personal contact details made available to the School should only be used for school communications.

Physical Contact with Students

All staff should be aware that situations may arise that can be perceived in a manner that was not intended. For this reason, all staff at the School should adhere to the following guidelines for contact with students both in and outside of School grounds:

- staff should avoid unnecessary physical contact with students;
- minimal, non-lingering, non-gratuitous physical contact in the context of the situation is acceptable (e.g. congratulatory pat on the back or handshake); and
- contact for sport, drama and dance instruction is acceptable in a class situation but not in a 1:1 situation. If physical contact is required for specific technical instructions, it must be brief and only with the consent of the student. Note that a student may withdraw consent for this contact either verbally or gesturally and staff must remain vigilant whilst engaging in necessary contact situations. Once the consent has been withdrawn no further contact can be or should be made.

Off-Campus Excursions and Camps

During off-campus excursions or camps, the same physical contact guidelines apply as well as the following:

- checking of sleeping arrangements, or supervising of students changing should be done, where possible, with another staff member present and always in a manner that respects students' privacy and personal space;
- always knock and advise of presence prior to entering a bedroom or dormitory; and
- ensure that while in a bedroom or dormitory a strict staff/student relationship is upheld and that inappropriate behaviour, such as sitting on a student's bed, is not undertaken.

Where a staff member breaches this policy the School may take disciplinary action, including in the

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case of serious breaches, summary dismissal.

PROCEDURES

7. EMPLOYMENT OF NEW PERSONNEL

The School is very diligent and prudent in ensuring that all reasonable actions are taken so that only suitable, appropriate and exemplary people are selected to work or volunteer with our students. The school adopts a structured and systematic approach to recruitment and selection for all staff and volunteers as outlined in the Pulteney Grammar School Recruitment & Selection Policy (D2).

Pulteney Grammar School undertakes a comprehensive recruitment and screening process for all workers and volunteers that aims to:

- Promote and protect the safety of all children under the care of the organisation;
- Identify the safest and most suitable people who share Pulteney Grammar School's values and commitment to protect children; and
- Prevent a person from working at Pulteney Grammar School if they pose a risk to children.

This involves a combination of Criminal History, Referee and Background checks, face to face interviews and vigilance in observing their behaviour, attitudes and relationships with students. Whenever possible an additional face to face interview with the Principal or Business Director will be conducted prior to the appointment of any staff member.

Once engaged, workers/volunteers must review and acknowledge their understanding of this Policy.

Screening and Background Checks

All persons (staff, volunteers and contractors) are required to present to the School a current Working With Children Check before commencing their duties. A Working With Children Check must be updated every five years and is portable between employers but the status can change during its life.

From 1 July 2019, a Working with Children Check (WWCC) is a mandatory requirement for anyone in South Australia who wants to work (paid or unpaid) with children or who manages those people who work with children.

All teachers are required to have current registration with the Teachers' Registration Board of SA. A Working with Children Check (WWCC) is a compulsory component of the Teacher Registration and it is the teacher's responsibility to maintain the currency of their teacher registration (every 3 years) and provide the Human Resources Manager with a copy of their certificate prior to the expiration date. The School also validates the currency and accuracy of Working with Children Checks through the Screening Unit's online portal. As from 2019, all teachers will also be required to obtain a WWCC upon re-registration.

All potential staff and volunteers, will be required to supply, a before an employment or volunteering offer is finalised.

Reference Checks

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For all teaching and non-teaching staff at least two reference checks will be conducted and questions will be asked of referees to determine a person's suitability to work with children and young people. This will include reference to any relevant performance issues or complaints (in accordance with State and Commonwealth equal opportunity and privacy laws).

8. TRAINING OF STAFF, VOLUNTEERS AND CONTRACTORS

Pulteney Grammar School is committed to providing ongoing training to staff and volunteers in the areas of child harm or risk of harm, child protection and personal safety strategies, in order to equip staff and volunteers with the necessary skills to be able to respond adequately to any indicator or disclosure of child harm or risk of harm or inappropriate behaviour of another staff member or student. The staff training will include:

- child abuse including indicators, prevalence and incidence of abuse and effects of abuse (refer Appendix A);
- mandated notification requirements and the role of staff as mandated notifiers;
- personal safety and empowerment strategies for children (refer Appendix C) and young people in order for a program to be implemented at all levels of the School curriculum.

All new staff undergo an induction process. It is essential that new staff not only develop a thorough understanding of the legislative, administrative, social and educational requirements to protect children and young people but that they also engage with the School's proactive and positive child-safe ethos, culture and practices.

The Human Resources Manager, Heads of School or Executive line manager, will be responsible for conducting inductions for all staff, volunteers and contractors.

On-going training will be provided to all new staff and volunteers and the training program is updated every three years. Pulteney Grammar School will also be responsive to any suggestions by staff or volunteers on the type of training or professional development necessary to fulfil their roles in maintaining a safe environment at the School.

Child Protection Training - Responding to Risk of Harm, Abuse and Neglect – Education and Care (RRHAN-EC) Training

All school staff must complete the full-day RRHAN training and then the regular (every three years) update training (online). A current certificate must be provided to the Human Resources Manager prior to the commencement of duties or the expiration date of the training.

All teachers are required to undertake the full-day RRHAN-EC training to obtain their registration with the Teachers' Registration Board of SA and undertake the update training to renew registration.

A Working with Children Check (WWCC) is a compulsory component of the Teacher Registration process. It is the teacher's responsibility to maintain the currency of their teacher registration and provide the Human Resources Manager with a copy of their certificate prior to the expiration date of the training. The School also validates the

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currency and accuracy of Working with Children Checks through the Screening Unit's online portal. As from 1 July 2019, all teachers will also be required to obtain a WWCC upon re-registration.

Volunteers can undertake the online Education and Care Induction for Volunteers Module and print their certificate upon completion. Volunteers must undertake the training before commencing their role.

The current update training is available as an online training program:

<https://www.plink.sa.edu.au/pages/login.jsf>

Regular training and updates are provided to employees and volunteers in regard to: School policies, practices, Codes of Conduct, Protective Practices for staff and volunteers, legal obligations and mandatory notification.

9. The Keeping-Safe Child Protection Curriculum

Pulteney Grammar School recognises the importance of addressing matters raised in the Keeping Safe: Child Protection Curriculum (KS:CPC). The two main themes of the KS:CPC are:

- 'we all have the right to be safe' and
- 'we can help ourselves to be safe by talking to people we trust'.

The KS:CPC will be implemented via the Health and Physical Education learning area of the Australian Curriculum and the Pulteney Wellbeing Program.

In addition, Pulteney Grammar School is committed to ensuring that the curriculum addresses student agency where children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

Online Safety

Pulteney Grammar School acknowledges and accepts its responsibility to ensure that children are protected from harm when participating online.

Pulteney Grammar School is committed to creating a safer online environment by working with esafety approved providers through the wellbeing program and the digital technologies curriculum.

Pulteney Grammar School has developed Responsible Use of ICT Policy (B4) a Student Anti-Bullying and Harassment Policy (A6). These documents also address online safety.

10 Reporting

Mandatory Reporting

It is an expectation of the school that **any person** who, in the course of their work or volunteering, suspects on reasonable grounds that a child is harmed or at risk of harm must report their suspicion to the **Child Abuse Report Line: CARL 131 478 or online for non-emergency matters via:** <https://www.childprotection.sa.gov.au/reporting-child-abuse>. When reporting online, users must set up an account first. All staff new to the School will receive guidance on this process at the commencement of their employment.

This includes even persons who are not mandated to report suspected child harm or risk of harm or neglect under the legislation.

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All teachers, staff and volunteers must also inform the Principal of any mandatory notifications, to ensure that the Principal can take any appropriate action to support the child or young person. If the notification concerns the Principal, then the Chair of the Board of Governors would be informed, not the Principal.

The *School Mandatory Notification Procedure* (Appendix C) details the requirements and process to make a report and these must be followed precisely.

In relation to members of the Board of Governors, should any Board Member, in the course of their governance duties, become aware of any Pulteney Grammar student at risk, they must inform CARL immediately, and following their notification to the report line must inform the Principal immediately.

It is a **requirement that employees and volunteers inform the Principal of any mandatory notifications made**. This will ensure that the Principal can put in place the appropriate action to support the child. If the concerns or allegations raised in the notification involve the Principal, then Deputy Principal must be informed instead.

Documentation and Record-keeping

Staff are encouraged to use the Mandatory Notification Pro-Forma (Appendix I) to assist with the reporting process. Upon making a mandatory notification, please submit this form immediately to the Principal's office. Please regard this information as confidential. Do not save an electronic copy. Do not store in student's school file.

10.1 Investigating

If the appropriate child protection service or the police decide to investigate a report, all employees, contractors or volunteers must cooperate fully with the investigation.

Whether or not the authorities decide to conduct an investigation, the Principal will consult with the authorities to determine whether an internal investigation is appropriate. If it is decided that such an investigation will not conflict with any proceeding of the authorities, the Principal may decide to conduct such an investigation. All employees, contractors and volunteers must co-operate fully with the investigation.

Any such investigation will be conducted according to the rules of natural justice.

The Principal will make every effort to keep any such investigation confidential; however, from time to time other members of staff may need to be consulted in conjunction with the investigation.

After an initial review and a determination that the suspected harm or risk of harm warrants additional investigation, the Principal shall coordinate the investigation with the appropriate investigators and/or law enforcement officials. Internal or external legal representatives will be involved in the process, as deemed appropriate.

10.2 Responding

10.2.1 Responding to allegations of child harm or risk of harm

The care, safety and welfare of the student is the paramount consideration. The School will act promptly and responsibly in dealing with any reports and allegations of harm or risk of harm or neglect.

All reports will be managed by the Principal (or the Chair of the Board of Governors).

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Where appropriate other external authorities will be notified e.g. SAPOL, Teachers' Registration Board, AISSA.

The Guidelines provided in the SA cross-sector document Managing allegations of sexual misconduct in SA education and care settings (2019) when required will be followed.

If the report involves a staff or community member, the Principal will also follow the guidelines in the *Critical Incident Procedure*.

If it is alleged that a member of staff, contractor or a volunteer may have committed an offence or have breached the organisation's policies or its Code of Conduct the person concerned may be stood down (with pay, where applicable) while an investigation is conducted. If the investigation concludes that on the balance of probabilities an offence (or a breach of the organisation's policies or Code of Conduct) has occurred then disciplinary action may follow, up to and including dismissal or cessation of involvement with the School. The findings of the investigation will also be reported to any external body as required.

10.2.2 Responding to problem sexual behaviour involving children and young people

The Guidelines provided in the SA cross-sector document: Responding to problem sexual behaviour involving children and young people: Guideline for staff in education and care settings (2022) are to be followed in all circumstances where a child or young person is alleged to have engaged in problem sexual behaviour.

The responsibilities staff members have in these circumstances are significantly different from those involving allegations of sexual misconduct by adults. They reflect the different rights and needs of children and young people and the different legislation within which staff must operate.

10.2.3 Record Keeping and Documentation - Documentation of any incident and follow up actions, e.g. reports, records of interviews and meetings must be stored in a locked, confidential file (refer Appendix D).

10.3 Privacy

All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. The School will have safeguards and practices in place to ensure any personal information is protected.

Everyone is entitled to know how the personal information is recorded, what will be done with it, and who will be able to access it.

11. Reviewing

Pulteney Grammar School's Child Protection Policy and Procedures will be reviewed and updated, every 3 years. The Child Protection Policy and Procedures will also be reviewed and updated when the school:

- Expands the services it offers to children and young people;
- Undergoes a substantial change to the responsible or managing authority; or
- Experiences an event or incident where children or young people were or could have been at risk of harm.

When changes are made to the Child Protection Policy, Pulteney Grammar School will relodge its

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12. RELEVANT CONVENTION, LAW AND CROSS SECTOR GUIDELINES

Legislative Context

[Children and Young People \(Safety\) Act 2017](#)

[Child Safety \(Prohibited Persons\) Act 2016](#)

[Statutes Amendment \(Child Sexual Abuse\) Act 2021](#)

[Criminal Law Consolidation Act 1935 \(SA\)](#)

[Equal Opportunity Act 1984 \(SA\)](#)

[Sex Discrimination Act 1984 \(Cth\)](#)

[Teacher Registration and Standards Act 2004 \(SA\)](#)

[Education and Early Childhood Services \(Registration and Standards\) Act 2011\(SA\)](#)

[Education Act 2013 \(Cth\)](#)

[Education Services for Overseas Students Act 2000 \(including National Code of Practice for Providers of Education and Training to Overseas Students 2018\)](#)

[Disability Discrimination Act 1992 \(Cth\)](#)

Relevant Conventions

[National Principles for Child Safe Organisations](#)

[The United Nations Conventions of the Rights of the Child](#)

Relevant Standards and Frameworks

[Australian Student Wellbeing Framework](#)

[National Quality Framework](#)

[Safe & Supported: The National Framework for Protecting Australia's Children 2021 - 2031](#)

[Child Safe Organisations National Principles](#)

[Disability Standards for Education 2005](#)

[Homestay Standards](#)

Relevant Cross Sector Guidelines

[Protective Practices for staff in their interactions with children and young people](#)

[Managing allegations of sexual misconduct in SA education and care settings](#)

[Responding to problem sexual behaviour in children and young people](#)

[Suicide Postvention Guidelines](#)

13. REFERENCES

Children and Young People (Safety) Act 2017 (SA)

Child Safety (Prohibited Persons) Act 2016

National Principles for Child Safe Organisations

Equal Opportunity Act 1984 (SA)

Sex Discrimination Act 1984 (Cth)

Teacher Registration and Standards Act 2004 (SA)

The National Safe Schools Framework

The National Quality Framework relating to Early Childhood

Pulteney Grammar School Recruitment & Selection Policy (D2)

Pulteney Grammar School Reference Check Proformas

Pulteney Grammar School Student Management Policy & Procedure (A3) (Under Review)

Pulteney Grammar School Work, Health & Safety Policy (D10)

Pulteney Grammar School Drugs Policy (A5)

Pulteney Grammar School Privacy Policy (C13)

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Pulteney Grammar School Critical Incident Management Policy (C4)
Pulteney Grammar School Toileting Policy Procedure (243)
Pulteney Grammar School Responsible Use of ICT Policy (B4)
Pulteney Grammar School Staff Digital Devices Policy (D7)
Pulteney Grammar School Code of Conduct Policy (D18)
Pulteney Grammar School Volunteers (D19) (Under Review)

14. VERSION CONTROL

Version	Date Released	Approved By	Amendment
1	February 2006	Principal	Initial policy created
2	December 2007	Principal	Reviewed and updated
3	April 2010	Principal	Reviewed
4	November 2014	Principal	Major review based on SA Provincial Anglican Schools Child Protection Policy (Oct 2013)
5	October 2016	Board of Governors	Partial rewrite by Principal and reviewed by Executive, Governance & Nominations Committee, & Board.
6	October 2019	Board of Governors	Complete rewrite & update by Principal with new WWCC legislation. Reviewed by Executive, Governance & Nominations Committee & Board.
7	March 2021		Updated text and Act in Policy to reflect changes to legislation in South Australia.
8	October 2022		Updated terminology and references, Reviewed by Executive
9	July 2024	Board of Governors	Updated obligation and references in line with the national Principles of Child-Safe organisations, including expanded responsibilities, including the Board

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15. APPENDICES

A	Indicators of Child at Risk of Harm
B	Dealing with a Disclosure
C	The Mandatory Notification Procedure
D	Questions and Concerns
E	Overseas Students
F	Billeting
G	Outdoor Education
H	Behaviour of Children and Young People Towards Staff
I	Mandatory Notification Proforma

APPENDIX A

Indicators of a Child at Risk of Harm

The following list of indicators is not exhaustive.

Students frequently show indicators from more than one category and the examples listed are not necessarily exclusive to a single category of abuse. Any of these indicators may suggest that a student is being abused, neglected or at risk of harm; however, indicators should be considered in the context of the student's age, medical and developmental history, and capabilities. In addition, they may be indicators of mental illness, substance abuse and domestic violence within families.

PHYSICAL ABUSE	
Physical Indicators: ▪ Bruises; ▪ Burns; ▪ Hair missing in tufts; ▪ Lacerations and abrasions (especially to the eyes, lips, gums and mouth) ▪ Missing or loosened teeth; ▪ Self-mutilation; and ▪ Welts.	Behavioural Indicators: ▪ Fear of adults; ▪ Frequent absences, with or without explanation from parents/caregivers; ▪ Guarded or evasive answers to questions about the causes of obvious injury; ▪ Injuries that are not consistent with a child's explanation of them; ▪ Disclosure of abuse directly to an adult or indirectly to a friend; and ▪ Fear of going home.
EMOTIONAL ABUSE	
Physical Indicators: ▪ Depression; ▪ Eating disorders (anorexia or bulimia); ▪ Lethargy or fatigue; ▪ Symptoms of stress; ▪ Evidence of drug abuse or dependence; ▪ Wetting, soiling, smearing; and ▪ Psychosomatic complaints.	Behavioural Indicators: ▪ Aggressive or delinquent behaviour; ▪ Attempted suicide; ▪ Excessively compliant or passive behaviour; ▪ Excessive shyness or withdrawal; ▪ Low self-esteem; ▪ Fire setting; ▪ Truancy or school avoidance; ▪ Deliberate harming of animals; and ▪ Poor peer relationships.
SEXUAL ABUSE	
Physical Indicators: ▪ Bruises or bleeding from external genitalia, vagina or anal regions; ▪ Blood stained underwear; ▪ Pregnancy or fear of pregnancy; ▪ Signs of pain, itching or discomfort in the genital area; and ▪ Urinary tract infections.	Behavioural Indicators: ▪ Disclosure of involvement in sexual activity directly to an adult, indirectly to a friend or in a disguised way; eg. 'I know a person who...' ▪ Inappropriate expressions of affection; ▪ Inappropriate interest in sexual matters; ▪ Evidence of sexual themes in artwork, stories or play; ▪ Possession of pornographic materials; ▪ Promiscuity, exposure or sexual behaviour towards others; ▪ Use of sexual language inappropriate for child's age; ▪ Reluctance to change clothes in front of others; ▪ Wearing of inappropriate clothing; ▪ Fear states, eg. Anxiety, depression, obsessively neat, socially withdrawn, or overly compliant behaviour; ▪ Poor peer relationships; and ▪ Inability to concentrate in school.
NEGLECT	
Physical Indicators: ▪ Abandonment; ▪ Poor hygiene; ▪ Lack of adequate or suitable clothing; ▪ Inadequate nutrition; ▪ Lack of medical or dental care; ▪ Constant fatigue; ▪ Developmental delays; ▪ Untreated sore, boils or lice; and ▪ Lack of adequate supervision.	Behavioural Indicators: ▪ Falling asleep in school; ▪ Poor school attendance or alternatively always attends school, even when sick; ▪ Poor academic performance; ▪ Steals or begs for food or eats food from bins; ▪ Dull, apathetic appearance; ▪ Engages in vandalism; ▪ Engages in sexual misconduct; ▪ Uses drugs or alcohol; and ▪ Early arrival at school or reluctance to leave.

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Safety Checklist

If you can answer “yes” to more than one of the following questions, the child or young person at the centre of your concerns may be at significant risk:

- If the child/young person has been injured, is the nature of the injury severe?
- Is the child very young?
- Does the child have special needs that may increase their vulnerability (e.g. a disability)?
- Has there been any disclosure from the child/young person?
- Is the current injury located on the head or genital region?
- Is the pattern of harm continuing?
- Has the parent or caregiver threatened to harm the child/young person?
- Does an alleged perpetrator of abuse have continued access to the child/young person?
- Is there a history of previous harm to this child or a sibling?
- Is there a history of family violence?
- Is there a current or recent episode of violence?
- Is there a history of the child or siblings running away?

For further information about indicators of harm or risk of harm or neglect go to the Department for Child Protection website: <https://www.childprotection.sa.gov.au/reporting-child-abuse/indicators-abuse-or-neglect>

APPENDIX B

Dealing with a Disclosure

A student who discloses harm or risk of harm or neglect will often do so with great hesitation and with feelings of fear and guilt. Frequently they only hint or tell part of the story to see how the teacher reacts before fully disclosing.

A disclosure can often arouse strong feelings in the person to whom the disclosure is being made. Such reactions may include shock, anger and helplessness. It is important to be aware and in control of these feelings and that they be dealt with following the disclosure. Pastoral Care Staff (such as the Head of School, Head of House, Wellbeing Services Team member may be of assistance in this regard.

It is not easy for students to disclose harm or risk of harm or neglect as they may previously have been coerced, bribed or threatened into secrecy. They may need repeated reassurance that you believe them and that it was right to tell.

Public Disclosure

It is possible that a student may start to disclose in class or with a group of other students. If disclosure does begin in a public area, it is important for the teacher to use the strategy of **protective interrupting**, namely:

- Acknowledge that you have heard the student and stop him/her disclosing any further;
- Be supportive and gently indicate that he/she may want to talk to you about in a more private situation, and
- Quietly arrange to see the student as soon as possible, such as after the lesson, away from the other students.

Private Disclosure

The teacher's role is to listen actively to what the student may say but not push for details, or conduct an investigation:

- Remain calm and try not to express panic, shock or disbelief;
- Acknowledge that it can be difficult to talk about such things;
- Emphasise that the student is not to blame;
- Assure the student they have the right to feel safe;
- Accept what is said by the student (only **minimum information** is required for action);
- Do not ask questions as this could contaminate any future evidence;
- Do not express judgement about the alleged perpetrator;
- Use appropriate vocabulary when speaking with the student;
- Do not promise not to tell;
- Tell the student that the matter will be reported to the Principal and to a person outside the school who will be able to provide protection;
- Allow the student the option of having your support during an interview that may/will happen in the future; and
- Reassure the student that support will continue at school.

APPENDIX C

MANDATORY NOTIFICATION PROCEDURE

1. Preparing to Make a Report and Details to Include

When making a notification you need to be able to tell the child abuse report line as much information as you have about:

- child's name, age, date of birth, address
- description of injury, abuse and/or neglect (current and previous)
- the child's current situation
- the location of the child, parent or caregiver and alleged perpetrator
- when and how did you find out about the abuse.
- If the child is Aboriginal you should also provide the Clan group of the child, if known.

The report line staff will ask more detailed questions similar to below.

Child identification details and context

You will need to provide enough detail to identify the child or young person and give context to your report, including:

- the child's full name
- date of birth or age
- current address
- contact number
- school/kindergarten/ childcare centre
- ethnicity (i.e. Aboriginal, kinship group, non-English speaking)
- who are the parents, do they all live in the same house, are there siblings in the house?
- alleged perpetrator's name, age, address, relationships to the child or children, current whereabouts
- current whereabouts of the child or children of concern
- details of when the next expected contact with the alleged perpetrator will occur
- if there are any family court orders, apprehended violence orders or domestic violence orders in place.

Notifier details

You will be asked to provide details about yourself including:

- your full name, job title, agency name or address, contact number
- your relationship to the child or children of concern

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- type of contact you have with the family, frequency and last time you saw the child or children
- if are you working with the child or the family, and If so, in what capacity.

Considerations

You will also need to provide your reasons for contacting the child abuse report line. Questions may include:

- Are the caregivers aware that a report is being made?
- Have you given any expectation of action to the child?
- What action are you expecting the department to take?
- What action can you take?
- What action have you already taken, what impact has that had and how has it helped?

Details of concerns

You will be asked questions about the allegations that may include:

- What has the child disclosed: what did he/she say and what was his/her emotional presentation?
- Who saw or heard what and when?
- Size and location of injuries, if any, with descriptions of bruising (colour and appearance)
- Has the child been seen by a Doctor? If so, provide the name and contact number.
- Has the matter been reported to police?
- Who else is aware of the concerns?
- Are the caregivers protective?
- Describe any caregiver behaviour that is of concern, including how often and how severe.
- Describe any behaviour by the child that is of concern, including how often it occurs.

Family history

You will also be asked about the child's family and family history, including issues like:

- domestic violence
- drug and alcohol use or abuse
- violence to people outside the family
- relevant health factors
- extended family or other support networks
- child care arrangements
- nature of involvement with any agencies

- mental health issues/presentations and details of diagnosis if known
- physical or intellectual disability.

Problem sexual behaviour

When problem sexual behaviour is being reported, specific details of the behaviour are required including:

- type, context, frequency
- who the child or young person is engaging in sexual behaviour with (i.e. is it evident there is a power imbalance?)
- responses to behaviour (i.e. parents, school, parent's understanding of the behaviour, family attitudes to sexuality, appreciation of child's possible disability, mindfulness of age appropriate behaviour).

Persistent absenteeism

A report can also be made for a child or young person of compulsory school age who is not enrolled, or has been persistently absent from school without an acceptable explanation.

'Persistently absent' means there is a pattern of absenteeism that is enduring or ongoing in nature (an enduring pattern does not require extended consecutive absences).

An 'acceptable explanation' would give confidence about the child's safety and wellbeing and the certainty of the child's return to school at the earliest practicable time.

Where a report is being made for a child or young person under these circumstances it's useful to consider the following:

- is the school aware of the circumstances for this child?
- are you aware of any actions being undertaken to support this child by the school or other agencies?
- have you gained information from the family or child/young person themselves?

Before the call is concluded

You will be asked some final questions before completing the report:

- what prompted you to call? (if this is not already obvious)
- are the caregivers aware a report is being made?
- is the child or are the children aware a report has been made? What was their response?

2. Roles & Responsibilities

2.1. Staff and Volunteers

2.1.1. A staff member or volunteer is mandated under legislation and obliged by law to notify the Department for Child Protection through the Child Abuse Report Line (CARL) on **131 478** (or for non-emergency matters via <https://my.families.sa.gov.au/IDMProv/landing.html>) if they suspect on reasonable grounds

that a child/young person (even when the student is over 18 years of age) has been the victim of any sexual abuse; physical or psychological abuse or neglect to extent that the child "has suffered, or is likely to suffer, physical or psychological injury detrimental to the child's wellbeing; or the child's physical or psychological development is in jeopardy". The suspicion is formed in the course of the person's work (whether paid or voluntary) or carrying out official duties.

2.1.2. A staff member or volunteer must notify of their suspicion as soon as practicable after they form the suspicion.

2.1.3. Staff and volunteers have an obligation to take the necessary action to ensure the child is protected from further harm, but it is not the staff's or volunteer's role to conduct a detailed investigation or to confront the suspected perpetrator or to intervene with the child's family. Staff and volunteers do not have to prove that a child or young person has been harmed. This is the responsibility of specialist child protection workers and possibly the police.

2.1.4. Staff and volunteers who have concerns that harm or risk of harm or neglect are occurring must also inform the Principal.

2.1.5. They are to keep brief, written, dated notes of their suspicions or observations and complete the Mandatory Notification Form, found on Teams, under All PGS Staff, Forms and Documents or by following this [link](#).

2.1.6. Staff must give copies of all notes and the completed form to the Principal, who will store these confidential notes in a secure place.

Anecdotal records and other written information must be regarded as confidential and used in a professional manner. They may be subject to a court order that the records be made available to the court and to other persons for the purpose of legal proceedings.

2.1.7. If a student starts to disclose in class or any other public area, the teacher or volunteer should use the strategy of protective interrupting (see Appendix B).

2.1.8. If a student discloses to a staff member or volunteer in private and tries to elicit a promise that the staff member or volunteer will not tell anyone, it is important for the staff member or volunteer to explain that he/she has concerns about the student's safety and will have to take action to ensure that the student is protected from further harm or risk of harm. This will include informing the Principal. (For detailed information about dealing with a disclosure, see Appendix B)

2.1.9. Staff members and volunteers must not engage in general staff room discussion about a disclosure.

2.1.10. Staff and volunteers should be vigilant at all times in the School environment and report to the Principal any concerns that they may have as a result of observing other staff and volunteers in their relationships with children and young adults.

2.1.11. Should allegations of any kind of harm or risk of harm be made against the Principal, the staff member or volunteer should not inform the Principal but should go directly to the Chair of the Board of Governors. The Chair shall then inform the Department for Child Protection.

2.2. The Principal

2.2.1. In South Australia, it is the staff member or volunteer who is obliged by law to notify Department for Child Protection through the Child Abuse Report Line (CARL) on 131 478 if they suspect on reasonable grounds that a child or young person has been or is being abused or neglected and the suspicion is formed in the course of his/her work. On some occasions, it may be the Principal who completes the mandatory notification.

2.2.2. The Principal's role is initially not to investigate any disclosure or strong concern about the well-being of a student until advice has been sought from DCP or SAOL.

2.2.3. The Principal is responsible for all aspects of School management including the management of suspected or disclosed incidents of a child Risk of Harm .

2.2.4. The Principal must ensure that the School's pastoral care and/or curriculum structures address the issue of child harm or risk of harm and protective behaviours.

2.2.5. The Principal must ensure that staff receive appropriate training in the detection and reporting of child harm or risk of harm. Indicators of child abuse are to be found in Appendix A.

2.2.6. The Principal must ensure that all staff and volunteers are fit and proper persons to work with children by using screening and background checks through the Department of Human Services.

2.2.7. Unless a parent is the accused person, the Principal should immediately inform the parents of the victim of the allegations. This should be done in a sensitive manner, taking into consideration the victim's wishes.

2.2.8. Should any disclosure or strong concern of harm or risk of harm relate to the behaviour or misconduct of a staff member or volunteer, the Principal will make contact with the necessary authorities, including, but not limited to:

- Department for Child Protection (through the Child Abuse Report Line – CARL) on 131 478
- Teacher’s Registration Board
- Association of Independent Schools of South Australia (AISSA)
- The Chair of the Pulteney Grammar School Board of Governors

2.2.9. In the case of an allegation of sexual abuse, the fundamental steps that should always be observed are for the Principal to notify immediately:

- Department for Child Protection (through the Child Abuse Report Line – CARL) on 131 478
- SA Police on 131 444 (in the case of sexual misconduct)
- Parents of the victim, unless a parent is the accused person
- The Chair of the Pulteney Grammar School Board of Governors

2.2.10. The Principal must retain all records of communication with external bodies and the subsequent actions taken. All records must be stored in a secure place to ensure confidentiality and kept separate from any other file on the student. There should be an indication on the student’s general file that other confidential records are being kept separately without revealing the nature of these records.

2.2.11. The Principal should immediately take basic steps to secure the place where the alleged offending occurred, if that is on the site of the School, until Police arrive. An example is quarantining a computer/laptop if the allegation is possessing child pornography. The Police will properly secure the crime scene on arrival. If uncertain what to do, the Principal will contact the Police.

2.2.12. The Principal, with the assistance of the appropriate Pastoral Care Staff (such as the Deputy Principal, Head of Student Wellbeing, Chaplain, Heads of School, Psychologist, Counsellors, Nurse), will provide ongoing support for the student, the staff member and anyone else affected by this process or its outcomes.

2.3. Department for Child Protection

2.3.1. The Department for Child Protection administers the legislation *Children and Young People (Safety) Act 2017* and *Children and Young People (Safety) Regulations 2017* which impose a duty on staff and volunteers in schools to notify the Department for Child Protection if, in the course of their work, they suspect on reasonable grounds that a child had been abused or neglected.

2.3.2. In practical terms, the duty to notify the Department of Child Protection is a duty to notify the Child Abuse Report Line (CARL) on **131 478**.

2.4 SA Police

2.4.1 When an allegation of sexual misconduct is made to a member of staff or volunteer, it must be reported to the Principal immediately. The Principal must immediately report the allegations to the SA Police on **131 444**.

2.4.2 Police should not interview students (be they the victim, witness or the alleged offender) at School except as a matter of urgency or immediate necessity. In the ordinary course, students should be interviewed at a place nominated by Police that is off the site of the School.

2.5 Crisis and Communication Management

2.5.1 In the case of any report concerning the safety or welfare of a student being made, the Principal will inform those members of the School community who the Principal believes are directly affected or involved, and, if appropriate, communicate with the entire School community to ensure all students, parents, staff and volunteers are informed about the incident and how the School will manage it.

2.5.2 The Executive members on the Critical Incident Management Team together with the Principal will manage any counselling/debriefing to students, staff, volunteers and parents affected by the report. This debriefing should occur within 24-36 hours after an incident. Refer to the Pulteney Grammar School Critical Incident Management Policy (C4).

2.5.3 Media Management

2.5.3.1 All students, parents, staff and volunteers must refer any media enquiries directly to the Principal.

2.5.3.2 It is the role of the Principal to manage and respond to any media enquiries on behalf of the School. If an allegation of harm or risk of harm becomes public, the Principal will decide whether to issue a statement, following appropriate consultation with the Board Chair and relevant authorities.

2.5.3.3 In all dealings with the media, Pulteney Grammar School will endeavour to be transparent with the public; however, at all times this will be done in consideration of the duty of care owed by the School to any member of the School community. This will ensure the identity and wellbeing of the members involved is not compromised. Refer to the Pulteney Grammar School Critical Incident Management Policy (C4).

APPENDIX D

Key Questions

Must I keep written records?

- As a teacher you should keep brief written records of your observations including dates, the nature of the indicators or injuries, if any.
- The Principal is also expected to keep written records of the notification.
- Student Services personnel should also keep records of their involvement in such cases (e.g. the School Nurse should keep records of physical indicators, and the Chaplain, Head of Student Wellbeing and School Psychologist and other Student Services personnel keep records of behavioural and family indicators).
- All these records must be treated as highly confidential and stored securely and separately from other student records.

Can the written records I keep be used in evidence?

- Yes. If the investigating officers want to use the School's written records they must apply in writing to the Principal.
- All types of official records kept in these cases may be the subject of court orders that the records are made available to the court and to other persons for the purposes of legal proceedings.

Is there a time limit on suspected offences? Am I expected to report an offence that happened, for example, five years ago?

- There is generally no time limit on laying charges for offences relating to child Risk of Harm . That is a matter for the appropriate prosecuting authority.
- All suspected cases of child harm or risk of harm (including sexual abuse) and neglect should be reported, irrespective of when they may have occurred.
- The decision about whether to proceed with prosecution will be made by the appropriate external agency.

Can I be called to give evidence?

- Yes, a teacher can be called to give evidence.
- It is rare for a notifier to be called as a witness. It is understood that teachers are placed in a difficult position when asked to give evidence in court and for this reason it should be avoided if possible.

Am I expected to report harm or risk of harm if the perpetrator is a colleague or someone I know?

- Yes. The identity of the perpetrator is irrelevant to the responsibility of staff and volunteers to report.
- The procedures outlined in this document apply, whoever the perpetrator is.

Does the offender have to be told who notified?

- Under the Children and Young People (Safety) Act 2017 SA, The Department for Child Protection and SA Police will not reveal the identity of persons notifying a child at Risk of Harm . However, where a person who has notified an alleged offence is required to give evidence, their identity may be revealed in those proceedings.
- In extremely limited circumstances a court may also order that information which could identify the person who notified an alleged offence be disclosed.

It is important to note that the safety and welfare of the child is all important and that this is the primary concern of Pulteney Grammar School and the Department for Child Protection. No action will be taken which may jeopardise the safety of the child.

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APPENDIX E

Overseas Students

It is a requirement of all education sectors in South Australia that specified people that provide homestay and billeting, and either volunteer or come into contact with students, must undertake a screening and background check.

As a Student Exchange provider (for overseas exchanges) who arranges host families for student exchange visits to the school, Pulteney Grammar School will need to ensure that all members over 14 years in the proposed host family who may have involvement in supervision have undergone a screening and background check which is satisfactory to the School prior to a student being placed with that family.

Where another organisation (such as Rotary) has arranged host families for student exchange without any involvement from the School, and wishes to enrol a student in an independent school, it is the responsibility of that organisation to ensure that the members of the proposed host family have undergone screening and background checks. The School will request copies of the screening checks before the student attends as a student.

If an informal student exchange arrangement is organised, the School will ensure that screening and background checks by all members of proposed families have been undertaken (satisfactory to the School) prior to student placements in families.

APPENDIX F

Billeting

On various occasions throughout the year the need arises to billet visiting students. Once the required number of families for billeting has been identified and secured the following process is envisaged. In line with procedures followed by other educational sectors, Pulteney Grammar School will ensure that screening and background checks be undertaken by billeting families. This includes all adults and children aged 14 years and over residing in the household.

APPENDIX G

Outdoor Education

Outdoor Education is an important and positive experience; however, it can involve some higher risk activities. Whilst Pulteney Grammar School does not discourage such activities, all activities being planned will involve a risk assessment to ensure the safety and well-being of students participating is maximised.

Staff involved in planning outdoor education activities will be trained to use a risk assessment analysis to identify any risks to the safety and wellbeing of students, assess the degree of risk, and implement strategies to minimise the risk of harm occurring. The Risk Assessment document is available in the “policies and proformas” section of the intranet and can be used to conduct a risk assessment for each planned Outdoor Education activity.

At the conclusion of each Outdoor Education activity, the Outdoor Education staff will review the Risk Management Matrix for that particular activity.

APPENDIX H

Behaviour of Children and Young People towards Staff

Should a child or young person engage in inappropriate behaviour of a sexual nature, then immediate respectful steps must be taken to discourage the child or young person. The matter should be reported and documented promptly with the Principal and a plan of action developed to support the child or young person and the relevant staff member. Depending on the age/developmental capacity of the child or young person and contextual information, this plan of support may involve:

- communication with parents
- referral to and liaison with specialist counselling
- formalised support within the school, which may include closer monitoring or supervision of the child or young person in his/her interactions with other children and young people
- referral to and liaison with an appropriate agency with disability-specific expertise

Sometimes, the inappropriate sexual behaviour of the younger children towards staff can elicit a suspicion that the child in question has been sexually abused. In these situations, staff must:

- make a mandatory notification to the Child Abuse Report Line (CARL) on 131478
- consider the safety of other children and young people with whom the child has contact
- develop and document a plan of action and communication with all relevant parties

Some children and young people may actively seek a relationship with a staff member that would constitute an inappropriate relationship. In such circumstances, staff are advised to immediately report the information to the Principal and seek assistance from a senior staff member, school counsellor or Head of House to actively manage the situation in a way that *respects the emotional well-being of the child or young person and provides support to the staff member*.

Examples of behaviour that should be reported and addressed are:

- receiving gifts of an inappropriate nature or at inappropriate times (e.g. not as part of end of the year gift giving that some children and families follow)
- flirtatious gestures and comments
- inappropriate social invitations
- inappropriate touching or invasions of personal space
- inappropriate postings using any medium
- correspondence or communication that suggests or invites an inappropriate relationship.

The staff member and Principal should document the incident that initially prompted the concern and the plan of action that has been established. Contact with parents is recommended unless there are reasonable grounds to believe that this will create serious risks for the child or young person.

Sexual harassment – via any medium* at any time or place – or assault of a staff member by a child or young person should be dealt with following normal behaviour management protocols, with the involvement of parents and, where appropriate, Police. Along with this response, consideration must also be given to the most appropriate counselling and support that can be provided to the child or young person and family. It is important to use these incidents as

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opportunities to organise meaningful interventions that address early sexual and other offending behaviours.

*Includes postings on websites, whether 'private' or not.

For detailed guidance on managing problem sexual behaviours in children and young people, go to: [Responding to problem sexual behaviour in children and young people](#)

APPENDIX I

Mandatory Notification Proforma



CONFIDENTIAL: MANDATORY NOTIFICATION

Child Abuse Report Line 13 14 78

Student(s) name:		Date of notification:	
D.O.B:		Date of incident:	
Address:			
Year / Tutor Group:			
Name of Notifier:			

Family Related	Non-Family Related	Type of Notification
Abuse ☐ Yes	Adult ☐ Yes	E-notification ☐ Yes
Neglect ☐ Yes	(Employee/ volunteer / contractor at the site) ☐ Yes	Phone Call to Child abuse report line ☐ Yes
	Minor ☐ Yes	
	(Child / young person at the site) ☐ Yes	

Additional information if relevant (e.g., advice received from CARL)

Principal's name and signature:

Upon making a mandatory notification, please submit this form immediately to the Principal's office. Please regard this information as confidential. Do not save an electronic copy. Do not store in student's school file.

Pulteney Grammar School

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Notification Checklist

(Information you should have on you, if available, when you make a notification)

Identification details: (child / young person / siblings / parent / caregiver)	Other family details:
☐ full name (including other surnames) ☐ date of birth / age / year level ☐ current address; contact number ☐ Aboriginal or Torres Strait Islander ☐ non-English speaking / disability ☐ alleged perpetrator's name, age, address, relationship to child/young person, current whereabouts ☐ current whereabouts of child/young person ☐ next contact with alleged perpetrator	☐ are parents separated; any Family Court Orders ☐ does custodial/non-custodial parent have a partner/ partner's name ☐ knowledge about the functioning of the family or family violence/animal cruelty/violence to people outside of the family or drug/alcohol/ mental health problems or extended family or other support networks/child care arrangements or nature of involvement with any agencies/any Relevant health factors
Notifier details:	History of education/care actions:
☐ your full name, job title or roll in the school or care setting ☐ name, address and contact number of school or care setting ☐ your relationship to child/young person of concern ☐ type of contact you have with the family/how frequent ☐ capacity in which you are working with child/ family	☐ response from parents/carers if concerns have been raised with them ☐ 'take' up from parents/caregivers of referrals facilitated for them ☐ special supports for the child/ young person (SSO support, ILP, counselling, mentoring) ☐ referrals and involvement of integrated support services team with child/young person ☐ involvement of other government or non-government services ☐ your record of this notification
Details of concerns:	Request for further contact:
☐ if child/young person discloses: what did child/ young person say? What was the emotional presentation? ☐ who saw/heard what and when ☐ size and location of injuries/description of any bruising ☐ child/young person is seen by a GP: if so, name and contact number ☐ description of carer behaviours of concerns and frequency/ severity ☐ description of any of child's/young person's behaviours of concern and frequency/severity	☐ if you are advised that your notification is likely to result in a child protection response, have you indicated clearly that you want contact from child protection staff before that action occurs?