CHILD AND YOUNG PERSON SAFE ENVIRONMENTS POLICY

Created:	September 2021 (previously called Student Protection Policy & Procedures and Child Protection Policy)
Last Review:	November 2024 (and at least once in every five year period thereafter in accordance with the College's review cycle, or more frequently as required)
Next Review:	November 2029
Reviewed by:	Executive
Policy Owner:	The Principal
Approved by Board	November 2024

1 Purpose

Seymour College (the **College**) is committed to protecting all children and young people who access our school and site from all aspects of harm or risks of harm, and has established strategies, practices, policies and procedures to uphold this public commitment.

All policies, protocols and procedures flow from the College's vision: *To develop women of strength, optimism and justice, confident for the future.*

The College takes a zero tolerance approach to any behaviours that jeopardise the safety and wellbeing of children and young people (including child abuse and harm or risks of harm to children and young people). The College regards its responsibilities to safeguard children and young people with the utmost importance as it delivers an educational program curriculum that promotes the College's values of *Excellence, Respect* and *Innovation*.

This connection will be the foundation of all decisions made, and actions taken by the College when delivering a quality education to its children and young people. At all times, the ongoing safety and wellbeing of children and young people at the College will be at the forefront of mind, and the College's paramount consideration.

The College treats seriously its reporting obligations in relation to safeguarding children and young people, including to the Department for Child Protection via the Child Abuse Report Line (**CARL**) and SA Police. The College recognises that whilst reporting obligations may differ depending on a person's position within the College, all staff are required to uphold the ethos of this policy by ensuring that matters regarding the safety and wellbeing of children and young people are reported internally, and externally where required.

As such, this policy sets out how the College will meet its responsibilities and commitment to safeguarding the safety and wellbeing of children and young people, and is a policy made in accordance with the National Principles for Child Safe Organisations, the *Children and Young People (Safety) Act 2017* (SA), the *Criminal Law Consolidation Act 1935* (SA) and the *Child Safety (Prohibited Persons) Act 2016* (SA).

2 Statement of Intent to Safeguard the College's Children and Young People

Set out below is the College's publicly available statement of intent to safeguard the safety and wellbeing of the College's children and young people:

Seymour College supports the rights of children and young people and is committed to ensuring the care, safety and wellbeing of its students.

The College is committed to treating seriously all concerns raised about the harm or risk of harm to children and young people at the College, and responding to any concerns promptly, appropriately and thoroughly (including by ensuring that any response is compliant with the College's mandatory reporting obligations).

The College regards its child and young person protection responsibilities with the utmost importance. As such, the College is committed to providing our staff (including contractors and volunteers) with the necessary resources, skills and knowledge to understand and maintain a child and young person safe culture and ensure compliance with all the College's legal responsibilities. This commitment includes the provision of a safe and supportive living and learning environment for all children and young people at the College.

Safeguarding children and young people is the responsibility of every member of the College community. The College requires every person who interacts with children and young people at the College, including visitors, to model and encourage behaviour that upholds the dignity and protection of children and young people from harm or the risk of harm.

The College has a responsibility to understand and communicate the important and specific role it plays in the safety and wellbeing of children and young people and remain informed of the causes and signs of harm or risks of harm, and the strategies to prevent, safeguard against or respond effectively. Potential risks are identified, mitigated and/or eliminated where possible.

Our policies, procedures and practices are inclusive of the needs of all children and young people including race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs; diversity within our community is respected and equity is upheld.

The safety and wellbeing of children and young people is always the first priority and the College has a zero tolerance stance towards harm or risk of harm to children and young people, and acknowledges that the whole community has a responsibility to keep children and young people at the College safe.

3 Scope & Application

This policy applies to all Board members, the Principal, employees, volunteers, contractors, work experience students and other authorised personnel required to perform functions on the College's premises, or at College-organised activities and events. Collectively, these individuals are referred to as 'staff'.

This policy extends to any other person who is engaged in student-connected work at the College, or that otherwise has direct and regular contact with the College's students (whether supervised or not).

4 Definitions

For the purposes of this policy, key terms have been defined below:

4.1 Child or Young Person is a person under 18 years of age, for the purposes of the *Children and Young People (Safety) Act 2017* (SA).

A child is also a person under 18 years of age for the purposes of the *Criminal Law Consolidation Act 1935* (SA), except for the purposes of the criminal offence set out in section 65 the *Criminal Law Consolidation Act 1935* (SA) in which a child is under 17 years of age.

4.2 Parent includes a guardian or carer, and 'parents' has a corresponding meaning.

4.3 Prescribed Persons are people who are obliged by law to report child sexual abuse to SA Police. Under section 64 of the *Criminal Law Consolidation Act 1935* (SA), a Prescribed Person is an employee of the College or another institution such as a school (including volunteers, contractors, those who undertake practical training with the College as part of an educational or vocational course, or those who carry out work as a minister of a religion or as part of the duties of a religious or spiritual vocation).

4.4 Working with Children Check (WWCC) relates to people working or volunteering with children in South Australia who must, by law, have a valid, 'not prohibited' WWCC. A WWCC is an assessment of whether a person poses an unacceptable risk to children. As part of the process, the Screening Unit will look at criminal history, child protection information and other information.

5 Overarching Values and Principles

The College's approach to establishing a safe environment for and ensuring the safety and wellbeing of children and young people is guided by a number of overarching principles and values that guide the development and regular review of strategies, practices, policies and procedures to uphold our commitment to protect children and young people from all forms of harm or risks of harm. These principles and values are as follows:

- The safety of children and young people is the College's paramount consideration.
- Every child and young person at the College has the right to be and feel safe and free from harm or risk of harm.
- The views and voice of children and young people must be respected.
- The privacy of children and young people must be protected.
- Staff have a significant role in the prevention of harm or risk of harm to children and young people, and are required to take responsibility for implementing the strategies set out in this policy.
- The safety and wellbeing of children and young people is dependent upon the existence of a child and young person safe culture.
- Children and young people from culturally and linguistically diverse backgrounds, who identify as Aboriginal or Torres Strait Islander, have a disability, or have diverse

circumstances, needs and vulnerabilities have the right to special care and support.

- The protection of children and young people goes beyond the face-to-face relationships and extends into the world of online behaviour and interactions.

6 Raising and Responding to Concerns that a Child or Young Person May Be at Risk

The College takes seriously all concerns, allegations, suspicions or disclosures of that a child or young person at the College is or may be at risk of harm (including child abuse, grooming, sexual misconduct, and crossing professional boundaries), and responds to such concerns, allegations, suspicions and disclosures promptly, sensitively and thoroughly.

All instances of suspected risks of harm to children and young people at the College, or concerns and complaints relating to the safety and wellbeing of children and young people, including alleged breaches of the *Staff Code of Conduct*, must be reported to the Principal, a member of the College Executive Team, or a Student Safeguarding Officer, in conjunction with any report to external authorities if required, and will be treated very seriously and consistently according to the College's and individual staff member's internal and external reporting procedures and obligations.

The College has a *Child and Young Person Safe Environments - Raising and Responding to Concerns Policy*, available on the College's website, which sets out:

- How concerns about actual and suspected child abuse and harm or risks of harm to a child or young person at the College may be raised with the College.
- Who such concerns can be raised with at first instance (including the Principal, a member of the College Executive Team, or a Student Safeguarding Officer).
- How such concerns will be dealt with by the College (including by complying with any legislative reporting obligations, and the College's expectations of staff regarding information sharing and record keeping).
- How the College will support or assist children or young people at the College (and their families) who disclose such concerns, or who are otherwise linked to such concerns.

The College will ensure that the procedures contained in the *Child and Young Person Safe Environments - Raising and Responding to Concerns Policy* is focused on children and young people, and can be easily understood by the College community, in particular students.

If you believe that a child or young person at the College is at immediate risk of harm or danger, you should immediately phone SA Police on 000.

Other than allegations of harm or risk of harm, and concerns about the safety and wellbeing of children and young people, the College has in place a {Complaints and Grievance Handling Policy and Procedure}(available on the College website) for other general grievances which may be raised by students, staff or other members of the College community.

7 Failure to Protect Offence

Failure by a Prescribed Person (defined at section 4.3 of this policy) to protect a child under the age of 17 years from unlawful sexual abuse is also an offence under section 65 of the *Criminal Law Consolidation Act 1935* (SA).

This applies where there is a substantial risk that another person (the abuser), who is an employee of the College (or another institution, such as a school), will engage in the sexual abuse of a child who is under 17 years of age or in relation to whom the abuser is in a position of authority, and the Prescribed Person has the power or responsibility to reduce or remove that risk but negligently fails to do so.

The offence requires a Prescribed Person to reduce or remove a 'substantial' risk. It is not a criminal offence to fail to address every possible risk that a sexual offence may be committed against a child. However, there are a number of factors to assist associated persons in identifying risks which amount to 'substantial' risks. These include:

- The likelihood or probability that the child will become the victim of a sexual offence.
- The nature of the relationships between a child and the adult who may pose a risk to the child.
- The background of the adult who may pose a risk to the child, including any past or alleged misconduct.
- Any vulnerabilities particular to a child, which may increase the likelihood that they may become the victim of a sexual offence.
- Any other relevant fact which may indicate a substantial risk of a sexual offence being committed against a child.

8 Participation and Empowerment of Children and Young People

The College recognises that a safe culture for children and young people is also contingent upon the participation and empowerment of children and young people themselves.

Consistent with this understanding, the College has a range of strategies, curriculum and practices in place to develop a culture that facilitates participation and is responsive to the input of children and young people. These include:

- Ensuring children and young people's experiences are heard by conducting a range of surveys at the end of term and end of year and via wellbeing lessons. These surveys capture student attitudes and feeling towards the service and facilities provided by the College to effectively involve children and young people in decisions that affect them. The surveys also provide children and young people with an avenue to raise matters, complaints and concerns.
- Inviting children and young people at the College to be represented on various committees such as Student Representative Council, Reconciliation Action Plan and student-initiated committees, which are key avenues by which children and young people at the College can raise concerns and provide their ideas and feedback.

- Implementing 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'.

- Implementing a number of programs that complement the KS:CPC such as SHINE, Healthy Minds, the Swinburne Aristotle Program and URStrong.

- Promoting student voice and agency during curriculum lessons that specifically address matters raised in the KSCPC, Child Safe Principles program, Health and Physical Education lessons and other learning areas. This includes content about negotiating consent, managing relationships online and offline, and dealing with relationships when there is an imbalance of power, gender equality and gender in intimate relationships.

These strategies, curriculum and practices are promoted to children and young people at the College in ways that are readily accessible, easy to understand and user-friendly, by:

- Clearly communicating through age-appropriate language how children and young people can report any concerns or provide feedback via their class teachers, form/home group teachers, Clan Guardians, Deans of Wellbeing, Heads of School, the Director of Boarding, Director of Performance and Director of Sport.

- The KS:CPC is implemented through health and wellbeing lessons, and addresses student agency where children and young people at the College are informed about their rights, and encouraged to participate in decisions which affect them.

All children and young people at the College and their families also have the ability to provide feedback to the College at any point in time, including through the College's {Complaints and Grievance Handling Policy and Procedure}. This feedback is incorporated into decision-making by the College.

The College responds to complaints, ideas, and feedback promptly and fairly in accordance with its grievance policies.

9 Child and Young Person Safe Employment Practices

The College believes that the safety and wellbeing of children and young people is dependent on the existence of a child and young person safe culture. Establishing that culture requires effective staff recruitment, supervision and management practices.

All positions at the College that involve work connected to children and young people will have a position description, which clearly sets out:

- The position's requirements, duties and responsibilities regarding the safety and wellbeing of children and young people.

- The applicant's essential or relevant qualifications, experience and attributes in relation to education and the safety and wellbeing of children and young people.

- The College's ethos, values and commitment in respect of the safety and wellbeing of children and young people.

- How the College will support those who make disclosures.

The safety and wellbeing of children and young people is a paramount consideration during the recruitment process. All staff working with children and young people must be suitable and share the College's values and commitment to safeguarding the College's children and young people in practice.

The College assesses the suitability of staff to undertake work connected to children and young people through screening (including identity checks), qualification verifications, values-based interviews, work history checks and referee checks.

All prospective and existing staff will be informed of and required to comply with the College's children and young people safety and wellbeing practices (including by not limited to this policy, the College's and individual staff member's record keeping, information sharing and reporting obligations), and be subject to children and young people safety screening in accordance with the College's obligations under legislation (including the *Child Safety (Prohibited Persons) Act 2016* (SA)).

The College requires that staff act professionally, and in a way that embodies the College's public commitment to the safety and wellbeing of children and young people throughout their time at the College. The College's *Staff Code of Conduct*, available on the College's website, provides guidelines for staff on expected behavioural standards and responsibilities, and sets out examples of appropriate and inappropriate behaviours. The College will take appropriate disciplinary action where a staff member is found to have acted contrary to that Code, or the College's other policies and procedures regarding appropriate standards of behaviour.

The College also acknowledges the complexities which arise at the College's billeting, homestay and Boarding House facilities, where staff are required to interact with children and young people in both their educational and personal spaces. The College will ensure that in addition to the above, staff engaged to work at the College's Boarding House are appropriately equipped (whether by way of experience, qualifications or training) to manage these complexities in accordance with the College's policies and procedures. Above all and at all times, staff engaged to work at the College's Boarding House are to ensure a child and young person safe culture, particularly when the safety of a child or young person is so entrusted to the College.

This policy and the *Staff Code of Conduct* is provided as part of the formal induction and onboarding process and is also available on the internal network for staff on the College's intranet SOCS.

The College is committed to taking all reasonable steps to ensure that all persons recruited are the most suitable and appropriate to work and provide services to children and young people.

A successful applicant cannot commence at the College until written clearance in respect of child and young person safety and wellbeing screening is obtained. The screening will involve the verification of Department of Human Services (DHS) WWCC, interview, referee checks, Responding to Risks of Harm, Abuse and Neglect - Education and Care (RRHAN-EC) accreditation, a current teaching registration with the Teachers Registration Board of South Australia (if applicable), checking qualifications and previous employment history in working with children and young people.

These procedures are in accordance with the *Child Safety (Prohibited Persons) Act 2016* (SA), which requires staff to have a valid, 'not prohibited' WWCC. The College will sight and verify all teaching registrations (if applicable) and WWCCs through the DHS

Screening Unit portal before any person commences working with children and young people, and it will be appropriately recorded that staff can engage in child and young people connected work.

If the College is made aware of any serious criminal offence, child protection information or disciplinary or misconduct information regarding any staff member or prospective staff member, the College will notify the notify the DHS Screening Unit.

At least annually, the College will ensure that appropriate guidance and training is provided to relevant staff engaged in work connected with children and young people about:

- Individual and collective obligations and responsibilities for identifying and managing the risk of harm to children and young people.
- Relevant risks in the school environment (including the online environment and the College's billeting, homestay and Boarding House environment).
- The College's strategies for managing risks.
- The College's current safety and wellbeing standards and practices in safeguarding children and young people.

If for any reason, a staff member does not attend a mandatory children and young people safety and wellbeing training or briefing, the College will direct the staff member on the relevant material and resources on College's website (including this policy) which amongst other things, address mandatory reporting obligations, and the offences of failure to protect and failure to report.

If the training or briefing session is recorded, a copy of the recording and/or module will be provided to the staff member, who must confirm they have viewed and completed the content. Otherwise, the College must arrange for the staff member to complete the training or briefing on an alternate date, as soon as practicable.

The College will ensure that privacy and employment law obligations are met when responding to child and young person concerns and complaints.

Staff will otherwise be subject to regular supervision, training and periodic children and young people safety checks, including to ensure their ongoing suitability for work connected with children and young people.

10 Student Safeguarding Officers

The College has appointed Student Safeguarding Officers as a first point of contact to provide advice and support to students, parents, and staff regarding the safety and wellbeing of children and young people at the College.

The following Student Safeguarding Officers may be contacted to provide advice and support:

Name	Position
Kate Kilpatrick	Deputy Principal Wellbeing & Operations
Natalie Paelchen	Deputy Principal Academics & Professional Practice
Yoon-Ah Lee	Head of McGregor Campus
Carolyn Cochrane	Director of Boarding
TBC	Director of Performance
Angela Foley	Director of Sport
Rachel Butler Wills	Acting Dean of Senior Years
Ramon Bartholomeusz	Dean of Middle Years
TBC	Head of Early Years
Natalie Guthrie	Director of Finance & Operations
Fiorella Bolam	Safety Risk & Compliance Manager
Teresa Dwyer	People & Culture Manager

Student Safeguarding Officers can be contacted via Reception on (08) 8303 9000

The student safeguarding officer will inform the Principal via phone or in person immediately once they have received a report.

Student Safeguarding Officers are able to act as a source of support, advice and expertise to staff on matters relating to the safety and wellbeing of children and young people at the College and liaise with the Principal and the College Executive Team to maintain visibility of the safety and wellbeing of children and young people.

Staff are encouraged to speak with one of the Student Safeguarding Officers should they hold any concerns relating to the safety and wellbeing of children and young people.

Staff, students and parents can contact the Student Safeguarding Officer for further information regarding the safety and wellbeing of children and young people and for any questions or concerns or reports of suspected or alleged child abuse or harm or risks of harm to children and young people at the College.

11 Risk Management

The College is committed to identifying and assessing potential sources of harm and takes proactive actions to ensure the likelihood of the harm is decreased. The risk assessment tools will be utilised where appropriate to determine if a child or young person is at risk.

The College will develop and implement risk management strategies regarding the safety and wellbeing of children and young people online and in the physical school environment (including the College's billeting, homestay and Boarding House environments) without compromising a child or young person's right to privacy, access to information, social connections and learning opportunities.

These strategies will identify, control, remove and otherwise focus on preventing and reducing, the risk(s) of child abuse, harm and otherwise, risks to the safety and wellbeing of children and young people by taking into account the nature of the environment, the activities expected to be conducted in that environment (including the provision of services by contractors or outside organisations), and the characteristics and needs of all students expected to be present in that environment.

In addition, these strategies will place a positive responsibility on ensuring that the safety and wellbeing of children and young people is actively promoted at the College.

Where the College identifies risks of actual or suspected child abuse or harm or risks of harm to children or young people occurring in the online or physical school environment, it will make a written record of those risks and determine the action(s) it will take to remove or otherwise reduce the risks (risk controls and risk treatments).

The College will monitor, review and evaluate the effectiveness of the implementation of its risk controls and risk treatments annually, and update these where required.

Please view Schedule 2 for the College's current Risk Management Plan.

12 Reflection and Continuous Improvement

The College is committed to continual improvement that is responsive to emerging thinking, evidence and practice, so as to eliminate (where practicable) the possibility of safety risks to children and young people occurring in the first place. Where the College can improve, it will strive to do so. The College will report on the outcomes of any relevant review to the College community.

13 Responsibilities

Society as a whole shares responsibility for promoting the safety and wellbeing, and protection of, children and young people from the risk of harm. In the College context, all members of the College community have a role to play.

However, specific responsibilities in respect of safeguarding children and young people at the College are assigned to:

- The College Board.
- The Principal.
- The College Executive Team.
- Student Safeguarding Officers.
- Staff.
- Students and parents/guardians.

For a summary of these responsibilities, please see Schedule 1.

14 Communication and Implementation

14.1 Communication

This policy is made publicly available on the College's website. This policy can also be accessed via the College's intranet SOCS.

This policy is available to staff as part of the College's and the Board's internal policies and procedures. Aspects of (and updates to) the College's child and young person safe environments frameworks, including this policy will be addressed in the College's professional development updates, training programs, memos and newsletters.

14.2 At Board / Principal Level

To properly implement this policy:

- The Board and Principal will review this policy and the College's children and young people safe practices at least once every five years in accordance with the *Children and Young People (Safety) Act 2017* (SA) (or more frequently after a significant child or young person safety and wellbeing incident) and implement improvements where applicable.
- The College will lodge a new Child Safe Environments Compliance Statement with the DHS each time the policy is reviewed and updated.
- Families and the College community will be afforded the opportunity to contribute to the review and development of the College's children and young people safety and wellbeing strategies (including this policy).
- Periodic training and refresher sessions on this policy are provided to all staff.
- The Principal is responsible for monitoring staff compliance with this policy. All staff must ensure that they abide by this policy and assist the College implementing this policy.

14.3 At Other Levels

To properly implement this policy, all staff must ensure that they will abide by this policy and assist the College in the implementation of this policy.

15 Related Documents

Legislation

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

Criminal Law Consolidation Act 1935 (SA)

Child Safety (Prohibited Persons) Act 2016 (SA)

Teachers Registration and Standards Act 2004 (SA)

Schedules to this Policy

Schedule 1: Summary of Responsibilities

Schedule 2: Risk Management Plan

Policies

Child and Young Person Safe Environments - Raising and Responding to Concerns Policy

{Staff Code of Conduct}

Grievances Handling Policy and Procedure

Fact sheets

Report suspected harm of children and young people | Department for Child Protection

Criminal offences | Department for Education

SCHEDULE 1 – SUMMARY OF RESPONSIBILITIES

1 Introduction

This Schedule is part of the College's child and young person safe environments framework, and sets out how the College allocates responsibility for meeting its public commitment to safeguarding the safety and wellbeing of children and young people at the College.

2 The Board

The Board is the governing body for the legal entity which operates the College, and as such is ultimately responsible for ensuring that the care, safety and wellbeing of children and young people is the College's paramount consideration.

Without limiting that responsibility, the Board:

- Acquires guidance and information on matters relating to the safety and wellbeing of children and young people and keeps up-to-date with its child and young person safety and wellbeing obligations through engaging in professional development.

- Satisfies itself that the College has strategies (reflected through policies, procedures, words and actions) to embed a culture of safety and wellbeing for children and young people in the governance, operations and culture of the College, which comply with the Board's obligations under the National Principles for Child Safe Organisations, the *Children and Young People (Safety) Act 2017* (SA) and the *Child Safety (Prohibited Persons) Act 2016* (SA).

- Delegates roles and responsibilities to the Principal, for achieving the College's safety and wellbeing strategies for children and young people.

- Endorses strategies (reflected through policies, procedures, words and actions) to embed a child and young person safe culture at the College, which comply with the College's legal obligations.

- Seeks to be satisfied that the Principal has allocated appropriate roles and responsibilities to the College Executive Team, and to staff, for achieving the College's safety and wellbeing strategies for children and young people.

- Ensures that safety and wellbeing of children and young people are embedded in the leadership, governance and culture of the College.

- Ensures that the College, and in particular the Principal, has adequate resources and support to achieve the College's child and young person safety and wellbeing strategies.

- Keeps the Principal and, via the Principal keeps, all staff accountable for achieving the College's safety and wellbeing strategies for children and young people, sharing relevant information and ensuring adequate recordkeeping.

- Periodically reviews the effectiveness of the College's safety and wellbeing strategies for children and young people in practice (including by, if considered appropriate, revising those strategies).

- Ensures that the safety and wellbeing of children and young people remains a regular Board agenda item for review, reflection and discussion as well as ensuring that the College reports on the outcomes of any relevant review to the College community.

- Ensures that privacy and employment law obligations are met when responding to a child and young person's concerns and complaints.

3 The Principal

In accordance with good governance, the Board delegates responsibility for the day-to-day operation of the College – and in particular the care, safety and wellbeing of children and young people - to the Principal.

The Principal is therefore responsible at a day-to-day level, and accountable, for taking all practical measures to ensure that:

- The College has a child and young person safe culture (including in the online environment and billeting, homestay and Boarding House environment), and that this is promoted within the College environment – such as at assemblies and on posters in classrooms and other visible locations.

- The College's child and young person safety and wellbeing strategies are achieved, both in policy and in practice.

- The College's child and young person safety and wellbeing strategies are communicated to staff, students and families, and that input is sought regarding policy development and review.

- Staff are enabled, prepared and supported when managing child and young person safety and wellbeing concerns, including in their support of the child(ren) or young person(s) involved (and, where appropriate, their families).

- Staff are educated, and complying with, their professional and statutory responsibilities regarding the safety and wellbeing of children and young people.

- Staff are enabled, prepared and supported in identifying harm and risks of harm to children and young people, noting that indicators of harm or risks of harm may vary depending on the differences and needs of the child and young person.

- Staff champion and model compliance with safety and wellbeing policies and procedures.

- Concerns about the safety and wellbeing of children and young people, or harm and risks of harm, are dealt with seriously, promptly and thoroughly, and in accordance with the College's strategies, and any statutory obligations are met and that the College cooperate with law enforcement agencies and relevant authorities as required.

- The Board receives timely reports regarding safety and wellbeing concerns and risks about children and young people, or any developments regarding the College's child and young person safety and wellbeing obligations and strategies.

4 The College Executive Team

The College Executive Team is committed to 'leading from the front' and engaging in a preventative, proactive and participatory approach to child and young person safety and wellbeing issues.

Where appropriate, the College Executive Team will assist the Principal with discharging the child and young person safety and wellbeing strategies contemplated in this policy, and as otherwise required by legislation and good practice.

5 Student Safeguarding Officers

Key responsibilities for the College's Student Safeguarding Officers include:

- Having a good working knowledge and appreciation of the College's child and young person safe environments framework.
- Without replacing any legal reporting obligations any person may have, supporting the Principal in promptly managing the College's response to an allegation of actual or suspected child abuse or risks of harm to a child or young person at the College, and ensuring that the allegation is taken seriously and responded to appropriately and thoroughly.
- Ensuring the College's child and young person safety and wellbeing strategies are clearly and regularly communicated to staff, students and other members of the College community.
- Ensuring the College's child and young person safety and wellbeing strategies are being implemented effectively and are strengthened where required.
- Ensuring a strong and sustainable culture for the safety and wellbeing of children and young people is embedded within the College.

6 Staff

All staff are required to comply with the College's child and young person safe environments framework (including this policy, *Staff Code of Conduct* and *Child and Young Person Safe Environments - Raising and Responding to Concerns Policy*), as well as their legal and professional obligations with respect to the prevention and reporting of actual or suspected child abuse or harm or risks of harm to a child or young person at the College.

It is each such staff member's individual responsibility to be aware of key indicators of harm, or risks of harm, to be observant, and to raise any concerns they may have with the Principal, a member of the College Executive Team, one of the College's Student Safeguarding Officers (and/or with external agencies, where required). In this regard, staff are encouraged to voice their concerns, no matter how minor, trivial or insignificant.

All contractors and volunteers involved in student-connected work are required to adhere to this policy and the *Staff Code of Conduct* and are responsible for contributing to the safety and wellbeing of children and young people in the school environment. They too have obligations with respect to the reporting of actual or

suspected child abuse or harm or risks of harm to a child or young person at the College.

Again, it is the College's expectation that contractors and volunteers are attuned to their individual responsibilities and act in accordance with their internal and external reporting obligations, and the College's policies and procedures.

SCHEDULE 2 – CHILD & YOUNG PERSON SAFE ENVIRONMENTS RISK MANAGEMENT PLAN

Child & Young Person Safe Environments Risk Management Plan	
Responsible Officer(s)	College Executive Team
Approved by	Principal
Date	November 2024
Date of Next Review	2028
Organisation Name	Seymour College
Purpose	To ensure Seymour College provides a safe environment for all children and young people at the College.
Location	In the Seymour College premises, bus transportation, sports grounds, billeting, homestay, Boarding Houses and any other area where teaching, learning, co-curricular activities or living facilities are held.

Risk Name and Description	Actions to Minimise Risk
School Culture – Child Protection - Culture of organisation is not child-safe focussed	• Child and young people focused *Staff Code of Conduct* is in place that sets the behavioural standards expected including what happens when a breach occurs. • The culture of the College Executive Team reflects our strong commitment of the College to the safety of children and young people. • All teaching staff at the College are accredited in (or working towards) in the Keeping Safe: Child Protection Curriculum (KS: CPC). • National Principles for Child Safe Organisations are embedded in policies and procedures. • We meet the requirements of the *Children and Young People (Safety) Act 2017* (which mandates child safe environments) and the *Child Safety (Prohibited Persons) Act 2016* (which mandates Working with Children Checks). • Our child safe environments policies and procedures are made available to staff, volunteers, children, young people and their families, via the College's website and SOCS. • Child safety is the first agenda item on Board, Executive and Senior Leadership meeting schedules. • Student Safe Guarding Officers meet to discuss child safety matters and processes as well as identify mechanisms to enhance child safety across the College and report to Executive. • CompliLearn Compliance Learning Management System access to a range of online learning modules designed to help schools to meet compliance obligations and to support positive workplace behaviours.

Risk Name and Description	Actions to Minimise Risk

	• Dedicated staff role in:
	  • Ensuring all staff, volunteers, visitors meet the safeguarding compliance requirement.
	  • Monitoring and managing WWCC & Police clearances, RHHAN training.
	• Dedicated Safety, Risk and Compliance Manager.
	• Risk Assessments completed for all excursions, camps, inductions.
	• Utilise programs to support work in compliance: Consent2Go, Complispace, Reach & Clipboard.
	• Utilisation of classrooms are considered in regard to accessibility and fire safety.

Personal Issues – Child Protection Incident - Organisational staff (including employees, volunteers, students, contractors etc) harm children/young people	• Recruitment processes include undertaking referee checks to ensure the suitability of persons before they are employed/volunteer with our organisation. • Interview questions (no prior preparation by candidate) should gauge an applicant's understanding of Child Safe Principles and actions that would be taken to prevent harm to children and young people and include compulsory questions regarding the candidate's suitability to undertake the role. • All employees and volunteers have WWCC with 'not prohibited' result prior to working with children and young people. • WWCCs are updated every five (5) years. • Information on the College's complaints and feedback processes, and a copy of our *Child and Young Person Safe Environments Policy* and *Child and Young Person Safe Environments – Raising and Responding to Concerns Policy* and is made available to children, young people, and their families.
Wellbeing & Safety – Outside the School Grounds - We hold overnight and/or off-site activities with children and young people	• Consent of parent/caregiver must be given. • For overnight activities (e.g. camps and excursions), children and young people must be supervised by a minimum of two (2) adults. • Recruitment processes including undertaking referee checks to ensure the suitability of persons before they are employed/volunteer with the College is completed. • All employees/volunteers over the age of 14 years have a 'not prohibited' WWCC. • Children and young people will not be left under the supervision of unauthorised persons. • Sleeping arrangements will not compromise the safety of children or young people such as unsupervised sleeping arrangements.

Risk Name and Description	Actions to Minimise Risk
	• In the event of billeting arrangements, host adults have a 'not prohibited' WWCC. The host family have children/young person who is currently enrolled. • Children and young people have the right to contact their parents/caregivers if they feel unsafe, uncomfortable, or distressed during the stay. • Risk Assessments are required for all excursions, camps and retreats, both within South Australia, interstate and overseas. Part of the RA process relates staff: student ratio.
Child Protection & Complaints Handling - Children/young people do not feel included and children/young people and their families are not supported to report concerns, complaints and feedback.	• Children, young people and their families are encouraged to participate in our College and provide feedback by completing surveys throughout the academic year that helps to express their concerns and share ideas (e.g. parent evenings, specific year level surveys, feedback after camps and excursions and significant trips/tours). • Students regularly complete end of year surveys, which in turn helps shape the health and wellbeing lessons and support offered to students. • Grievance policies are available on the College website, detailing on how complaints will be handled. • Complaints processes are in place and promoted to children, young people and their families to make sure that they feel safe reporting to the College. • Staff are trained in the process to follow when students disclose to them that they are/have been experiencing risks of harm or engaged in sexual behaviour and are supported by members of the College Executive Team, Student Safeguarding Officers and College counsellors in undertaking mandatory reports. In such circumstances, students are also followed up by the College counsellors to ensure they are safe.
Non Reporting of Child Protective Incidents - Staff (including employees, volunteers, students, contractors etc) do not understand their obligations to report harm and risk of harm to the Child Abuse Report Line and SA Police if child/young person is at immediate risk or requiring an internal reporting process before meeting legal obligations to report to CARL.	• All employees and volunteers must abide by the *Child and Young Person Safe Environments Policy, Child and Young Person Safe Environments – Raising and Responding to Concerns Policy* and *Staff Code of Conduct*. • The College meets the requirements of the *Children and Young People (Safety) Act 2017* (which mandates child safe environments) and the *Child Safety (Prohibited Persons) Act 2016* (which mandates Working with Children Checks). • The *Child and Young Person Safe Environments Policy* and *Child and Young Person Safe Environments – Raising and Responding to Concerns Policy* is reviewed at least once in every five-year period. When this happens, a new Child Safe Environments Compliance Statement is lodged with the Department of Human Services. • All staff in the College are required to go through the RRHAN-EC training which highlights these responsibilities.

Risk Name and Description	Actions to Minimise Risk
	• All staff trained in Responding to Risk of Harm and Neglect – Education and Care on commencement and refresher training every 3 years after.
Physical Contact	• Any physical contact must be appropriate to the delivery of services being provided. • Where physical contact is required, this is undertaken in a safe way by explaining why contact is required and what will happen and asking the child/young person for their permission (or their family if this is more appropriate) before proceeding. • Unnecessary physical contact is not allowed.
Online Environment - Online communications	• Cyber safety and social media guidelines are in place and provided to all staff. • Staff must not communicate with students of the College via social media. • The College's IT Department has content filtering that enable sites that may cause harm to children and young people to be blocked from access. • Teachers monitor all students when they use their laptops. • Social media is blocked in the College. • Educational programs in line with the Child Protection Curriculum and those recommended by the Office of eSafety Commissioner about online safety, are taught explicitly, within Pastoral Care programs and Information Evenings for parents/caregivers are provided. • Implemented the initiatives outlined in the Toolkit for Schools (Prepare, Engage, Educate and Respond) that promote online safety and media literacy. • The College has an *Acceptable Use of Information and Communication Technologies for Staff/Students Policies*, a *Social Media Policy* and a *Student Anti-Bullying and Harassment Policy*. These documents also address online safety.
Wellbeing & Safety Outside School Grounds - Transport of children and young people	• Staff must not transport a child or young person unless specifically approved. • Parents/caregivers must provide consent before transporting a child or young person. • The staff member must have a valid, unrestricted driver's licence if they are transporting a child. • The vehicle must be registered, insured and in roadworthy condition. • Staff members assigned in driving students must complete a 'Driver Safety Awareness' course via CompliLearn. • A staff member must not be alone in a vehicle with a child or young person.

Risk Name and Description	Actions to Minimise Risk
	• Parents/caregivers are provided with the Student Motor Vehicle Policy and must grant permission for their child/young person to drive and/or transport another student in their care to College events.
Privacy Compliance - Taking images of children and young people	• Consent to take pictures/recordings of children and young people and disclosure as to how the image is to be used, is sought from parents/caregivers at time of enrolment. • A list of students who do not have photo permission is readily available to staff. • The Marketing and Communications Team regularly check for changes to photo permissions in Consent2Go and update the list. • The Marketing and Communications Team check images before uploaded to websites/socials or used in College publications. • Any events where photography is taken, children or young people who do not have photo permissions are noted and excluded accordingly. • No names are included with images on social media unless for special occasions when specific permission is sought. • The Principal gives permission for staff to use personal phones to take photos of College events, however, all photos of students captured on staff personal devices are required to be shared with the Marketing & Communications Team and promptly deleted from personal devices.
Wellbeing & Safety Within School Grounds - Physical environment	• Maintain a risk register that is reviewed annually to ensure effectiveness. • The College conducts risk assessments for all activities. All risk assessments are reviewed post activity, to ensure a cycle of continuous improvement, in line with WHS best practice. • Ensure all equipment is in good working order. • Workplace Inspections biannually to ensure all classrooms, office and work areas pose no risk to child safeguarding.
Privacy Compliance - Privacy and confidentiality	• Any private or confidential information is only shared with staff members who must be notified about the information. • The College has a Privacy Policy & Collections Notice to deal with private and confidential information. • Multi factor Authentication is used to strengthen security when staff are using laptops and mobile digital devices. • All physical documents containing confidential information are stored privately in a locked cabinet (or similar place with restricted access) • Digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties.

Risk Name and Description	Actions to Minimise Risk
	• Staff must not disclose information regarding any child or young person without written consent of the child, young person and their parent/caregiver. • College counsellors also keep their own confidential records. • The College Executive Team and Student Safeguarding Officers are briefed on our College's approach to note keeping – based on best practice. • Crisis Response Policy & Procedure developed for use by Executive Leadership. • Any mandatory reports made online or via phone are documented on a proforma and forwarded to the Principal for secure storage.
Wellbeing & Safety Outside School Grounds - Billeting	• The College begins the planning process as far in advance as possible and establishes a timeline for the process. • The College assigns a coordinator at the visiting school and the host school; determines the number of staff supervisors required for the activity; and where possible, billets two or more students of the same sex together. • The College ensures that consent forms are signed, and medical information forms are completed by the parents/caregivers of students to be billeted; provides the names and ages of students being billeted to the host school as early as possible; and provides details of billeting families and allocated students to the coordinator of the visiting school at least 3 weeks before activity commencement and 4 weeks for international students. • The College ensures that the host family has signed a form acknowledging the billeting conditions. • When organising an overseas trip, teachers must discuss child protection requirements with the host school. • The College provides for alternative suitable accommodation in case there is an insufficient number of host families. • Prior to activity commencement, the College provides a program to all participants outlining the agenda, venues, meeting times, places and addresses, and group travel arrangements. • The College provides billeted students with information about issues that may arise and strategies for keeping themselves safe, ensures that contact numbers are provided to all students and their families so that the coordinator can be contacted and concerns about a student's safety will be taken seriously and appropriate action will be taken to protect the student. • The College will ensure that Working with Children Checks are undertaken by all people (14 years and over) residing in the household of billeting families

Risk Name and Description	Actions to Minimise Risk

Boarding Services Risks - Homestay	• The College ensures all people over the age of 14 years residing at any homestay have a current Working with Children Check.
	• The College conducts regular visits and assessments of the homestay with access to all areas of the premises, for the purposes of checking compliance with legislative requirements and homestay standards. This includes:
	  • a safe, private and secure bedroom for the student's sole use with suitable storage space for clothes, personal items and study materials, and a suitable area in which to study including a desk, chair and adequate lighting;
	  • a clean home with appropriate furnishings suitable for a family and students;
	  • access to a shared or private bathroom, with reasonable time allowed for showers;
	  • access to the kitchen, living areas, laundry facilities and shared areas of the home;
	  • access to heating in winter and cooling in summer if required;
	  • household facilities and appliances which comply with government regulations regarding safety standards; and
	  • provision of keys, alarms or passwords required to have free access to the homestay residence.
	• The College ensures host families have an appropriate insurance policy to cover students residing in their home.
	• The College ensures there is regular training of host families, particularly those hosting students under 18 years of age.
	• The College ensures that there is a 24-hour emergency contact number that is known to students, the host family and the education provider.
	• The College maintains regular contact with host families, students and College staff as required.

Boarding Services Risk - Boarding House	• Boarding House staff are required to follow the *Staff Code of Conduct,* have a current Working with Children Check, have completed Mandatory Notification training, have a current Senior First Aid certificate; and complete the Australian Boarding Schools Association 'Duty of Care' Certificate Course in Student Residential Care within one term of commencing work at the College.