



PRINCE ALFRED COLLEGE

## CHILDREN AND YOUNG PEOPLE SAFEGUARDING POLICY STATEMENT

<b>Prepared by:</b>	<i>Risk and Compliance</i>
<b>Approved by:</b>	<i>The College Council</i>
<b>Approval Date:</b>	<i>This policy was ratified by the College Council in xxxr 2024</i>
<b>Revision Date</b>	<i>November 2027</i>
<b>Version:</b>	<i>09/22- Policy has amended to include the requirements to report sexual abuse suspects to Police 09/22 Replace students with Children and Young People (CYP)</i>

### 1.0 Purpose

- 1.1 Prince Alfred College (or 'the College'), as an organisation, strives to be a community that promotes care, respect and cooperation, and values diversity. The College affirms the right of all members of the school community to feel physically and emotionally safe, secure and valued.
- 1.2 Prince Alfred College acknowledges its responsibility to support the care and protection of children and young people ('CYP') while they are at school, early learning centre, out of school hour care, boarding house, outdoor education camps, Kent Town Swim, or involved in school-organised activities.
- 1.3 Prince Alfred College promotes models of behaviour between the College personnel and CYP based on mutual respect and consideration. This policy applies to all employees, volunteers, work placement students and contractors referred to throughout the policy collectively as 'staff'.
- 1.4 All staff are required to act in accordance with the policy.
- 1.5 As an organisation encompassing Prince Alfred College Preparatory and Secondary School, Prince Alfred College offsite campuses, Prince Alfred College Early Learning Centre, Prince Alfred College Out of School Hours Care and Kent Town Swim ('PAC Organisation'), we encourage and respect the views of CYP and involve them in decision making as appropriate. We provide clear age-appropriate or developmentally appropriate explanations to CYP including their right to safety, their right to be listened to, and that they can provide feedback or make a complaint if they have a concern, to any staff member or ask their parent/guardian to do this on their behalf. We will listen to and act upon any complaints or concerns that a CYP raises with us.

## **2.0 Policy Statement**

- 2.1 PAC Organisation has developed the following CYP Policy as an overarching document that provides key elements of our approach to safeguarding CYP from harm or risk of harm.
- 2.2 This Policy forms the foundation of the PAC Organisation's policy framework, procedures and practices, and ultimately the College's culture with respect to CYP safety.
- 2.3 The PAC Organisation's 's CYP Policy has been approved and endorsed by the College's Council.
- 2.4 The Policy is reviewed at least every three years, or earlier if required. We will lodge a new child safe environments compliance statement with the Department of Human Services each time we review and update this policy.

## **3.0 Policy Objectives**

- 3.1 This Policy provides the framework for:
  - the development of work systems, practices, policies and procedures that promote CYP safeguarding within the PAC Organisation
  - the creation of a positive and robust CYP safeguarding culture
  - the promotion and open discussion of CYP safeguarding issues within our organisation
  - complying with all laws, regulations and standards relevant to child safeguarding in South Australia.

## **4.0 Statement of Commitment to Children and Young People Safety**

- 4.1 The PAC Organisation is to provide a safe environment to all CYP. This policy complies with the Children and Young People (Safety) Act 2017, the Child Safety (Prohibited Persons) Act 2016 and aligns with the National Principles for Child Safe Organisations.
- 4.2 We support the rights of the child and will act without hesitation to ensure a safe environment is always maintained. We value and respect CYP and welcome them regardless of their background. Bullying and harassment will not be tolerated.
- 4.3 We also support the rights and wellbeing of our staff and encourage their active participation in creating and maintaining a CYP safe environment.

## **5.0 Our Children and Young People Safety Values and Principles**

- 5.1 All CYP have the right to be safe. Our commitment to CYP safety is based on the following overarching principles that guide the development and regular review of our work systems, practices, policies and procedures to protect CYP from risk of harm.
- 5.2 Caring for a CYP brings additional responsibilities for all staff. All staff within the PAC Organisation are responsible for promoting and protecting the safety and wellbeing of CYP by:

- always adhering to this policy and take all reasonable steps to ensure the safety and safeguarding of CYP
- treating everyone including those of different race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes and religious beliefs with respect and honesty and ensure equity is upheld
- being a positive role model to CYP in all conduct with them
- setting clear boundaries and maintaining appropriate behaviours with CYP – boundaries help everyone to understand their roles
- listening and responding appropriately to the views and concerns of CYP
- being alert to bullying behaviours and responding promptly and appropriately
- ensuring another adult is in sight when conducting one to one consulting, coaching, instruction or other activity
- being alert to CYP who have been harmed, or may be at risk of harm and reporting this quickly to the Child Abuse Report Line (13 14 78).

### 5.3 All staff must not:

- engage in rough physical games
- develop any 'special' relationships with a CYP that could be seen as favoritism such as the offering of gifts or special treatment
- do things of a personal nature that a CYP can do for themselves, such as toileting or changing clothes
- discriminate against any CYP because of age, gender, cultural background, religion, vulnerability or sexuality.

## **6.0 Code of Conduct and Professional Boundaries and Expectations of Staff**

6.1 As part of the Staff Code of Conduct, PAC specifies standards of professional boundaries when working and interacting with a CYP. This is based on information outlined in the Protective practices for staff in their interactions with CYP: Guidelines for staff working or volunteering in education and care settings (as amended or updated) (Protective Practices Guidelines). The aim is to provide guidance to staff on how best to support a CYP, and how to avoid or manage difficult situations. The Protective Practice Guidelines applies to all staff and breaches of the Code may result in disciplinary action, up to an including dismissal.

## **7.0 Recruitment**

7.1 To ensure we engage the most suitable people to work with CYP the following recruitment practices are in place:

- our commitment to child safety is included in all job advertisements with clear position descriptions that include our commitment to CYP safety and wellbeing
- face-to-face interviews that use behavioural questions to determine the applicant's knowledge of child safeguarding
- at least 2 referee checks and qualification checks.

7.2 In accordance with the Child Safety (Prohibited Persons) Act 2016, Prince Alfred College is registered with the DHS Screening Unit and we link all Working with Children Checks (WWCC). All staff over the age of 14 years who will be working in a role with CYP must hold a current, not prohibited WWCC issued by the Screening Unit of the Department of Human Services, provide evidence of this prior to employment and renew this every 5 years. We will verify the accuracy of all WWCCs in the DHS Screening Unit portal as required by law.

- 7.3 We will immediately contact the Department of Human Services Screening Unit when we become aware of assessable information (eg: the person has been charged with or found guilty of an offence or is subject to disciplinary or misconduct proceedings, an intervention or restraining order) regarding any person involved with our organisation, including any serious criminal offence, child protection information, or disciplinary or misconduct information.

## **8.0 Training, supervision and support for staff**

- 8.1 We have strategies in place to supervise, train and support staff to understand the PAC Organisation's child safeguarding policy, their mandatory reporting obligations, how to build culturally safe environments and their responsibilities to create a child safe and friendly environment. Our strategies include:

- Training:
  - As part of their induction, ensure all staff read and understand the Mandatory Reporting Information Booklet available at:  
[https://dhs.sa.gov.au/\\_\\_data/assets/pdf\\_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF](https://dhs.sa.gov.au/__data/assets/pdf_file/0003/103179/CSE-Mandatory-notification-information-booklet.PDF)
  - Complete the online 'Responding to Risk of Harm, Abuse and Neglect' training in PLINK every 3 years
  - Attend staff meetings for updates from senior staff members
- Support:
  - an induction process for all new staff including a copy of this policy document
  - The College has appointed the following Child Safeguarding Officers to support the CYP Safeguarding Policy:
    - I. Head of Secondary School
    - II. Head of Preparatory School
    - III. Director of Boarding
    - IV. Director, People and Culture
  - Staff, students, and community members may contact these officers by phone, in writing, via email, online meeting, or in person. If a concern involves any of the designated Child Safeguarding Officers, individuals should contact the Headmaster. For concerns involving the Headmaster, direct communication should be made to the PAC Governing Council. Reports to any of the Child Safeguarding officers may be submitted anonymously. If anyone feels uncomfortable contacting these officers directly, they may contact the PAC Privacy Officer instead at [privacy@pac.edu.au](mailto:privacy@pac.edu.au).

## **9.0 Reporting and responding to harm or risk of harm**

- 9.1 We aim to ensure that CYP are safe from harm and risk of harm. Section 17 of the Safety Act defines 'harm' to mean physical or psychological harm (whether caused by an act or omission), including harm caused by sexual, physical, mental or emotional abuse or neglect.
- 9.2 All staff, being mandated reporters, have a legal obligation to notify the Child Abuse Report Line (CARL) on 13 14 78 as soon as practicable if they have a suspicion that a CYP has been harmed or may be at risk of harm. If the CYP is at immediate risk, report to South Australia Police (SAPOL) on 000.
- 9.3 Even if not a mandated reporter, any person can report harm or risk of harm to a CYP. The individual

who identifies the harm or risk of harm is encouraged to make the report to authorities and can request the support from another staff member to do so if required.

9.4 Information about making appropriate reports of harm or risk of harm is available from the South Australian Department for Child Protection website:  
<https://www.childprotection.sa.gov.au/reporting-child-abuse>.

All staff (even if not a mandated reporter) have a legal obligation to report child sexual abuse by another staff member to the police and to protect a CYP from sexual abuse by another staff member. Failure to meet these obligations may be considered a criminal offence.

9.5 Following a report being made to CARL or SAPOL staff must make an internal report to management. We will be guided by the Department for Child Protection and/or SAPOL after a report has been made as to whether we can conduct an internal investigation.

9.6 If a staff member is reported to CARL or SAPOL for causing harm or risk of harm to a CYP, they will be removed from any role that involves working with any CYP until authorities have concluded their investigation. This may involve suspension from some or all duties until an investigation is concluded.

9.7 Following a report to CARL or SAPOL we will support the CYP by:

- referring the CYP or their family to other appropriate services
- continuing to provide a service to the CYP and their family and monitor their circumstances.

9.8 We will document all information received regarding the report and store this securely in a separate file.

## 10.0 Risk Management

10.1 The College has developed and implements a risk management strategy that identifies, assesses, and takes action to minimise and manage the risks of harm to CYP.

10.2 The outcome of this assessment is contained in the PAC Risk Register.

10.3 To help maintain a safe environment for CYP, we will review risks regularly and implement strategies to minimise and manage these risks.

10.4 A list of identified risks is included in the table below.

Identified risk	Actions to minimise risk
Online communications	<ul style="list-style-type: none"> <li>• cyber safety and social media guidelines are in place and provided to all staff</li> <li>• staff must not communicate or be friended with CYP via social media</li> <li>• use the College's authorised ICT systems for all communications. Avoid using personal emails, phones (except during excursions, tours, or billeting arrangements), social media, apps, or websites to communicate with CYP.</li> </ul>

Transport of CYP	<ul style="list-style-type: none"> <li>• staff must not transport a CYP unless specifically approved</li> <li>• parents/guardians must provide consent before transporting a CYP</li> <li>• staff must not be alone in a vehicle with a CYP except boarding staff in their loco parentis role</li> </ul>
Supervision	<ul style="list-style-type: none"> <li>• if a CYP is not collected by parent/guardian at end of sessions at ELC or OSHC, two educators are to stay with the CYP until they are collected</li> <li>• if providing one to one consultation with a CYP, it will be in line of sight of another adult</li> </ul>
Taking images of CYP	<ul style="list-style-type: none"> <li>• consent of parent/guardian required</li> <li>• disclosure will be made as to how the image is to be used and consent must be provided by the parent/guardian</li> </ul>
Physical environment	<ul style="list-style-type: none"> <li>• maintain a risk register that is reviewed at least annually to ensure effectiveness</li> <li>• conduct risk assessments for all activities</li> <li>• ensure all equipment is in good working order</li> </ul>
Privacy and confidentiality	<ul style="list-style-type: none"> <li>• all documents containing confidential information will be stored privately in a locked filing cabinet (or similar place with restricted access)</li> <li>• digital files containing confidential information shall be protected electronically by restricting the access to only those requiring it to perform their duties</li> </ul>
Overnight and/or off-site activities	<ul style="list-style-type: none"> <li>• consent of parent or guardian must be given</li> <li>• CYP will not be left under the supervision of unauthorised persons</li> <li>• in the event of billeting arrangements, host adults should have a CYP attending the same event from the same household, and have a not prohibited WWCC</li> <li>• CYP have the right to contact their parents, or another adult, if they feel unsafe, uncomfortable, or distressed during the stay</li> </ul>
Change room and bathroom requirements	<ul style="list-style-type: none"> <li>• if staff enter a change room or bathroom a minimum of two adults must be present, unless there is reasonable suspicion of concerning behaviour amongst CYP at the time, in which case one adult may be appropriate</li> <li>• supervision will be provided ensuring the CYP's right to privacy</li> <li>• phones, cameras and recording devices must not be used in change rooms</li> </ul>

## 11.0 Management of Risk – Controls

11.1 Various overarching policies and procedures have been developed as part of the administrative controls to support the CYP.

11.2 These documents demonstrate the School's recruitment, selection, training, assigned responsibilities and reporting structures which form part of the conditions for staff employment and volunteer involvement with the School.

11.3 External resources are also incorporated into the Framework to provide guidance on legislative requirements and best practice.

## **12.0 Complaints and Feedback**

12.1 Providing opportunities for complaints and feedback ensures that the CYP and their families feel valued and respected and enables us to improve the quality of our service. CYP and their families are informed that they can provide feedback or make a complaint at their first appointment or as part of their welcome pack and when they join the PAC Organisation.

12.2 Compliments, complaints or feedback can be provided verbally to any staff member or direct to management either by telephone on or via email at [reception@pac.edu.au](mailto:reception@pac.edu.au).

12.3 We will deal with all complaints and feedback received promptly, sensitively and fairly. The PAC Organisation will:

- listen to the complaint/feedback
- ensure the person receiving the complaint will make a record of it if received verbally
- advise the time expected for an outcome
- ensure if a staff member receives a complaint, they must forward it to their supervisor/manager as soon as possible

12.4 The staff member's supervisor/manager will

- respond to the complainant with an outcome in a timely manner
- clearly document and securely store decisions and actions taken in response to complaints and feedback
- ensure that procedural fairness is provided at all times.

12.5 If the CYP or their family is not happy with the outcome from the complaints process they can contact

- The Education Standard Board
- Australian Human Rights Commission Online: [www.humanrights.gov.au](http://www.humanrights.gov.au) Tel: 1300 656 419
- South Australian Equal Opportunities Commission (for complaints relating to discrimination)

## **13.0 Implementation**

13.1 This policy is implemented through a combination of:

- staff training and development in professional conduct;
- student and parent/guardian education and information;
- uploading this policy and related documents onto our website
- distributing the policy and related documents to all staff as part of their induction following recruitment.

## **14.0 References**

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

14.2 Child Safety (Prohibited Persons) Act 2016 (SA)

14.3 Staff Code of Conduct

14.4 Mandatory Reporting Information Booklet

14.5 Education and Early Childhood Services (Registration and Standards) Act 2011

14.6 Protective practices for staff in their interactions with children and young people Guidelines for staff working or volunteering in education and care settings 2017 (2nd Edition, revised 2019)