Child Protection Policy
Updated April 2015. V3
# CHILD PROTECTION POLICY

**POLICY OWNER:** HEADMASTER

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### PREAMBLE:

The following policy is based upon the South Australian Provincial Anglican Schools’ Child Protection Policy developed in October 2013. The Anglican Diocese of Adelaide has developed this policy and procedures document to assist Principals, teachers and other staff in Anglican schools and Early Learning Centres at these schools to provide a child safe learning environment for all students in our Anglican schools and children in our Early Learning Centres.

### PURPOSE:

The St Peter’s College Child Protection Policy clearly articulates that in order for children to achieve their full potential, all staff must not only be informed of the content of this policy, but also follow closely the written processes about their duty to report suspected abuse and neglect to the Headmaster and to Families SA. The focus of this policy is about creating an environment which is both child-safe and child-friendly, where children feel respected, valued and encouraged to learn and grow physically, intellectually and spiritually.

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SCOPE:

This policy will be made available to staff, volunteers, students and parents of St Peter’s College via the School’s website and the School’s Information System - Keystone.

The attention of parents, students and children will be drawn to the Policy at least twice each year via the School's newsletter. The Headmaster and nominated Senior Staff will ensure that a copy of the St Peter’s College Child Protection Policy is always available from the administration of the Senior School, Junior School and the Early Learning Centre respectively.

The policy will be directed to the attention of all staff via the School’s Information System – Keystone, Policies & Staff Handbook site page, 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. This policy applies to all staff (including temporary relieving staff), students and volunteers at St Peter’s College. It covers information about the reporting of physical, emotional and sexual abuse as well as neglect.

REFERENCES

Children’s Protection Act 1993 (SA)
Criminal Law Consolidation Act 1935 (SA)
Sex Discrimination Act 1984 (Cth)
Teacher Registration and Standards Act 2004 (SA)
The National Safe Schools Framework
Responding to Abuse & Neglect in Education & Care (RAN) Training
The National Quality Framework relating to Early Childhood Education
Towards a Preferred Future – A Strategic Plan for St Peter’s College 2011 to 2014
St Peter’s College Recruitment & Selection Policy & Procedure
St Peter’s College Interview Running Sheet & Questions template
St Peter’s College Reference Check Proformas for Teaching staff and Support staff
St Peter’s College Induction Policy & Procedure
St Peter’s College Disciplinary Performance Management Policy & Procedure
St Peter’s College Behaviour Management Policy & Procedure
St Peter’s College Work, Health & Safety Policy
St Peter’s College Drug Policy
St Peter’s College Privacy Policy
St Peter’s College Managing Child Abuse Complaints Policy & Procedure
St Peter’s College Media Policy
St Peter’s College Crisis Management Policy and Procedure
St Peter’s College ICLT Acceptable Use Policies and Agreement Form
St Peter’s College Staff Network, Email and Internet Policy
St Peter’s College National Criminal History Record Checks & Mandatory Notification Policy & Procedure for Support Staff and Volunteers
APPENDICES

St Peter’s College eSmart Policy

A. Indicators of Child Abuse and Neglect
B. Dealing with a Disclosure
C. The Legal Implications for Reporting
D. Questions and Concerns
E. Overseas Students
F. Billeting
G. Boarding House
H. Outdoor Education
I. Behaviour of Children and Young People Towards Staff

Convention

The United Nations Convention of the Rights of the Child enshrines the entitlement of all children, regardless of race, colour, sex, religion or nationality, to be protected from sexual abuse, to receive special help if they are abused, to have their opinions heard about matters that affect them, to receive and share information, and to be treated with dignity if disciplined.

Law

Relevant legislation includes:

- *Children's Protection Act 1993 (SA)*, defines child abuse, mandates staff in education and care environments to report child abuse and neglect and requires all organisations providing education, child care or residential services wholly or partly for children to comply with principles of child safe environments.

- *Criminal Law Consolidation Act 1935 (SA)* defines illegal criminal behaviour.


- *Sex Discrimination Act 1984 (Cth)* defines sexual harassment and provides a complaint process through the Australian Human Rights Commission.

- *Teacher Registration and Standards Act 2004 (SA)* establishes and maintains a teacher registration system and professional standards for teachers such that the profession is represented by individuals who are competent and fit and proper persons to have the care of children. There are also obligations on both teachers and schools to report when a teacher has been dismissed for unprofessional
National Agenda

Principles and frameworks on the national agenda include:

- **The National Safe Schools Framework**: the Australian Government collaborated with state and territory governments on the National Safe Schools Framework as part of a national approach to supporting schools to build safe school communities. This vision includes creating learning environments which are free from bullying, harassment, aggression and violence.

- **The National Quality Framework** was adopted by the states in cooperative model legislation on 1 January 2012. It describes and regulates the quality of early childhood education and care and school age care through the National Quality Framework which includes the National Quality Standard and rating system.

- **Protecting Children is Everyone’s Business: national framework for protecting Australia’s children 2009 – 2020** identifies the long term, national approach that has been endorsed by all Australian Governments that seeks to help protect all Australian children.

Towards a Preferred Future – A Strategic Plan for St Peter’s College 2011 – 2014 underpins this Policy & Procedure.

Our vision is to be a world-class school where boys flourish. Our Core Values underpin this policy and procedure:

- Unlocking individual strengths and virtues.
- Embracing creative potential.
- Fostering wellbeing.
- Celebrating the uniqueness of each individual.
- Honouring differences and valuing teamwork.
- Developing life-long engagement, meaning and purpose.
- Celebrating accomplishments.
- Building life-long mindfulness, resilience and commitment to service.
- Developing emotional maturity and spiritual richness within the Anglican tradition.
- Fostering honesty and integrity.
- Meaningful engagement with our community;

The Diocese of Adelaide does not tolerate harassment or abuse in its church community and is committed to ensuring a safe environment in
CHILD PROTECTION POLICY

ALIGNMENT TO ANGLICAN SCHOOLS VISION & VALUES

Anglican schools in South Australia participate with the Dioceses of Adelaide, The Murray and Willochra in presenting the mission of the Anglican Church to the South Australian community by:

- providing a Christian education characterised by intellectual rigour, openness to ideas and debate, mutual respect, and good citizenship as Australians and members of the international community
- promoting within the whole School community ways to express the principles and values of Christianity in the decision-making processes, policies and structures of the School
- encouraging in children and young people an understanding and appreciation of oneself, and the development of personal ethics
- affirming the dignity and worth of all people and modelling tolerance and inclusiveness
- building collaborative relationships and networks within the School and in the wider Anglican community and beyond, and
- encouraging and supporting all staff in our schools to embrace and model Christian values.

PRINCIPLES

The St Peter's College acknowledges the serious consequences of child abuse and neglect, both in the short term and the long term. Within St Peter's College, the protection strategies and procedures are based on all its ministries. The Diocese has particular concern for children and young people. Every volunteer or employee should have a clear description of their ministry and its boundaries. No one should be undertaking ministry for which they are not authorised. The Diocese has determined that people ministering to those under the age of 18 should undertake screening and education. Children and young people may be at risk of abuse and neglect in a variety of cultural and social settings. The effect of child abuse and neglect can be traumatic and long-lasting not only to the child and young person, but to the whole family and the community at large. If leaders in the Anglican Church in the Diocese of Adelaide suspect on reasonable grounds that a child/young person has been or is being abused or neglected, they have a responsibility to notify Families SA on the Child Abuse Report Line. For further details of the Guidelines for Protecting Children in the Anglican Diocese of Adelaide go to:

the following principles:

- All adults have a responsibility to care for children, to positively promote their welfare and to protect them from any kind of abuse.

- All children have the right to a thorough and systematic education about personal safety, including safety in relationships.

- The School is committed to the importance and implementation of child protection strategies and procedures.

- All students should know that they are valued as persons from the time they enter the school community. This pastoral dimension should influence every aspect of the school’s life.

- The value of the family unit is to be respected but this should not be to the detriment of the well-being of the child.

- All persons involved in situations where abuse is suspected or disclosed must be treated with sensitivity, dignity and respect.

- The Headmaster is responsible for all aspects of School management including management of suspected or disclosed incidents of child abuse. With the assistance of appropriate Pastoral Care Staff (such as the School Chaplain, Heads of Schools, Psychologist, Nurse or Counsellor), the Headmaster will ensure that the School’s pastoral care structures address the issue of child abuse, and make appropriate provisions for the assistance of affected children, families and staff.

- In the education and care context, Duty of Care is a common law concept that refers to the responsibility of staff to provide children and young people with an adequate level of protection against harm. In their relationships with children and young people, staff are required to ensure that the physical and emotional welfare of children and young people is safeguarded, and that their own behaviour is guided by this duty of care both within and beyond the education and care setting.

- Mandatory reporting is a term used to describe the legislative requirement imposed on selected classes of people to report suspected cases of child abuse and neglect to government authorities. Mandatory reporting in South Australia applies to any sexual abuse, physical or psychological abuse or neglect to the 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". Mandatory reporting can be undertaken online by staff and Families SA are encouraging this method of mandatory reporting. For more
DEFINITIONS

1. **A child** is defined as a person who is under the age of 18 years or, in the absence of positive evidence of age, as a person who is apparently under 18 years of age.

2. **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. These students can be considered potentially vulnerable, however, and in need of specialist services and schools do own a duty of care towards them. For any allegation of child abuse, even when the person is over 18 years of age, the Headmaster will advise the SA Police (on 131444) and Families SA (131478). For sexual abuse of a student over 18 years of age, the student can also contact Yarrow Place (on 1800-817-421). Just because the student is over 18 years of age, it is not safe to assume that the abuse did not commence when they were still a child, or that no criminal offence has been committed. This is why contacting SA Police and Families SA remain fundamental steps.

3. **Child abuse and neglect** is defined as any non-accidental behaviour by parents, caregivers, other adults or older adolescents that is outside the norms of conduct and entails a substantial risk of causing physical or emotional harm to a child or young person. This definition refers to an act of commission or omission that endangers or impairs a child’s physical or emotional well-being.

4. **Abuse and neglect** may be categorised as follows:
   a. **Physical Abuse** occurs when a child has experienced severe and/or persistent ill-treatment. It can include injuries such as bruises, cuts, burns or fractures caused by a range

   -- Serious notification in regards to suspected abuse and neglect of children are required to be reported on the Child Abuse Report Line 13 14 78

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Staff who have access to information regarding suspected or disclosed child abuse or neglect have a clear obligation to observe appropriate confidentiality in relation to the entire matter, and an obligation to ensure that this information is secure.

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Schools are expected to follow the laws, standards and guidelines as developed under the Children’s Protection Act from time to time. For a more detailed review of safe environments for children and young people, go to:

of acts including beating, shaking, illicit administration of alcohol and other drugs, attempted suffocation, excessive discipline or physical punishment.

b. **Sexual Abuse** is when a child 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.

c. **Emotional / Psychological Abuse** is the sustained, repetitive, inappropriate ill-treatment of a 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.

d. **Neglect** exists when a parent or care-giver consistently fails to provide a child 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.

e. **The witnessing of family violence** has been broadly defined as "a child being present (hearing or seeing) while a parent or sibling is subjected to physical abuse, sexual abuse or psychological maltreatment, or is visually exposed to the damage caused to persons or property by a family member's violent behaviour" (Higgins, 1998, p. 104).

### POLICY:

1. **Staff and Volunteers**

   a. **Recruitment and Selection**

   The risk of employing unsuitable people to work at St Peter's College will be reduced by the School being vigilant in their employment practices and by adopting a structured and systematic approach to recruitment and selection for all staff and volunteers. St Peter’s College will seek to maintain best practice in recruiting teaching staff and volunteers to ensure their motivation to work with children and young people is honourable and has the best interests of the students as their priority. In order to achieve this St Peter’s College will adopt the following strategies in order to achieve best practice in recruitment. Also refer to the St Peter’s College Recruitment & Selection Policy. [https://keystone.stpeters.sa.edu.au/pages/Home.aspx](https://keystone.stpeters.sa.edu.au/pages/Home.aspx)
b. **Advertising**

All positions advertised will include a statement that St Peter's College is committed to the safety and well-being of its students, and will make reference to the School's Child Protection Policy which identifies the Staff Code of Conduct in relation to Child Protection.

c. **Interviews**

During an interview for either a potential staff member or volunteer, a response from the candidate to the School’s child protection strategies, such as the Child Protection Policy and Staff Code of Conduct, will be sought to determine the person’s reaction and willingness to accept these policies and procedures. Specific questions will be formulated to assess their motivation to work with children and young people and related values and attitudes. Refer to St Peter's College Interview Running Sheet & Questions template (refer Human Resources Department).

d. **Reference Checks**

For all teaching and non-teaching staff, and volunteers, at least three reference checks will be conducted and questions will be asked of referees to determine a person’s suitability to work with young people. This will include reference to any relevant performance issues or complaints (in accordance with State and Commonwealth equal opportunity and privacy laws). If an applicant has been previously employed at a school, it is strongly recommended that the previous Principal is contacted because other referees may not be aware of issues relating to the applicant that the Principal is aware of due to confidentiality reasons. Refer to St Peter’s College Reference Check Proformas for Teaching staff and Support staff (refer Human Resources Department).

e. **Screening and Background Checks**

Screening is an assessment of information obtained about a staff member to determine whether he/she may pose a risk to a particular group of people in a professional or volunteer environment. The Department for Communities and Social Inclusion (DCSI) Screening Unit is authorised under the *Children's Protection Regulations 2010* (Under the *Children’s Protection Act 1993*) to conduct Child-Related Employment Screening for people who work with children and young people. More information about who is required to undergo child-related employment screening can be found at [http://www.dcsi.sa.gov.au/services/screening/what-kind-of-](http://www.dcsi.sa.gov.au/services/screening/what-kind-of-).
f. Child Protection Training
There is a requirement that all staff undertake child protection training. This includes the full day training and the update training at least once every three years. The expectation is that staff should complete the training before they commence employment at the school although this is not always practical. It is important that staff undertake the training suitable for education and care settings and not the general child safe environments training. The current update training is available as an online training program: http://rantraining.e3learning.com.au/ It is also a requirement that volunteers be trained in Responding to Abuse & Neglect Education and Care (volunteer training package). Contact Human Resources for further information regarding the Volunteer Training Package.

g. Induction
All newly appointed staff and volunteers at St Peter’s College will be provided with information and guidance on the School’s child protection strategies such as the Child Protection Policy and the Staff Code of Conduct. New staff and volunteers will be educated about the open and aware environment at the School and commitment to preventing harm occurring to students. The Human Resources Department will be responsible for conducting inductions for all staff, volunteers and contractors. Refer to the St Peter’s College Staff Induction Policy & Procedure https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

h. Staff Supervision and Support
All staff and volunteers will be supervised and supported in their role in maintaining a safe, respectful and inclusive environment for students at St Peter’s College. Senior Staff will be available to answer questions about the child protection strategies at the School and encourage new staff members and volunteers to follow the guidelines provided in the Child Protection Policy and – Staff Code of Conduct (as identified in point 5 of this document). Staff and volunteers will be made aware that, should they be involved in an
allegation of child abuse or breach of the Staff Code of Conduct involving inappropriate behaviour, this process will be handled professionally (and in line with the School’s Disciplinary Performance Management Process) by the Headmaster.

Staff may also observe behaviours in other adults that they view to be inappropriate rather than abusive or that sit on the border of violating a professional boundary. Staff must ensure, through the Headmaster, that the adult concerned is made aware of the potential of his/her actions to impact negatively on children and young people, and on themselves. Professional advice of this kind may be particularly valuable to young or newly appointed staff.

All staff must take action if children and young people disclose information about inappropriate behaviours of other adults on the site. It is not acceptable to minimise, ignore or delay responding to such information. For the wellbeing of all members of staff, the Headmaster must be informed as a matter of urgency and a report made to the Child Abuse Report Line, if appropriate.

Refer to St Peter’s College Disciplinary Performance Management Policy & Procedure https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx
Refer to the St Peter’s College Work, Health & Safety Policy https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

2. Professional Development

St Peter’s College is committed to providing ongoing training to staff and volunteers in the areas of child abuse, 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 abuse 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;
- mandated notification requirements and the role of staff as mandated notifiers;
- understanding of professional boundaries and appropriate behaviour toward students;
- personal safety and empowerment strategies for children, and
- a focus on young people in order for a program to be implemented at all levels of the School curriculum.
Respecting to Abuse and Neglect Education and Care Training (RAN) Protective Practices, Guidelines for staff working or volunteering in education and care settings will be used as the reference point for any professional development in relation to Child Protection implemented at the School. This will enable the School to:

- build on the existing knowledge of staff who have trained and/or worked in SA.
- Underline this as a general professional obligation (linked for teachers to registration) as well as expectations of the School.
- Highlight those processes/expectations that are additional at the School so underscoring the high level of commitment to child protection.
- Prevent any confusion through different language.
- Foster updating as Responding to Abuse and Neglect Education and Care and Protective Practices are updated regularly.

This on-going training will be provided to all new staff and volunteers and the training program will be revised every two years. St Peter's College 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.

3. Duty of Care

In the education and care context, Duty of Care is a common law concept that refers to the responsibility of staff to provide children and young people with an adequate level of protection against harm. It is usually expressed as a duty to take reasonable care to protect children and young people from all reasonably foreseeable risk or injury. The question of what constitutes reasonable care in any given case will be determined objectively by a court and will depend on the individual circumstances of each case. The courts have found that the standard of care owed by education and care providers to children and young people is very high. In their relationships with children and young people, staff are required to ensure that the physical and emotional welfare of children and young people is safeguarded, and that their own behaviour is guided by this duty of care both within and beyond the education and care setting. Also refer to St Peter’s College Drug Policy https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

4. Professional Boundaries

The fostering of positive relationships between adults and children and young people is a key element of St Peter’s College. All staff can have a significant influence in the lives of children and young people because the relationship involves regular contact over relatively long periods of time. These features make it extremely important that staff understand the nature of the fiduciary and professional relationship between
students and teachers/volunteers.

Professional boundaries:

- define effective and appropriate interactions between professionals (staff and volunteers) and the students they serve;
- exist to protect both the staff member, volunteer and the student and;
- enable the relationship that involves trust and duty to be achieved.

The professional boundaries outlined in these guidelines apply beyond specific school sites and beyond specific cohorts of children and young people. For example, where staff are participating in interschool sport events or combined school trips or camps, they are expected to respect professional boundaries with all the children and young people involved in those activities. The following examples will assist staff to establish and maintain expected boundaries. This list is not exhaustive.

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| Communication     | • Inappropriate comments about a child/young person’s appearance, including excessive flattering comments  
                   | • Inappropriate conversation or enquiries of a sexual nature (e.g. questions about a child or young person’s sexuality or his/her sexual relationship with others)  
                   | • Disrespectful or discriminatory treatment of, or manner towards, young people based on their perceived or actual sexual orientation  
                   | • Use of inappropriate pet names  
                   | • Vilification or humiliation  
                   | • Jokes or innuendo of a sexual nature  
                   | • Obscene gestures and language  
                   | • Facilitating/permitting access to pornographic material  
                   | • Facilitating/permitting access to sexually explicit material that is not part of endorsed curriculum  
                   | • Failing to intervene in sexual harassment of children or young people  
                   | • Correspondence of a personal nature via any medium (e.g. phone, text message, letters, email, internet postings) that is unrelated to the staff member’s role. This does not include class cards/bereavement cards etc.  |
| Personal Disclosure | • Discussing personal lifestyle details of self, other staff and young people unless directly relevant to the learning topic and with the individual’s consent.  |
### Physical contact
- Unwarranted or unwanted touching of a child or young person personally or with objects (e.g. pencil or ruler)
- Corporal punishment (physical discipline, smacking etc.)
- Initiating, permitting or requesting inappropriate or unnecessary physical contact with a child or young person (e.g. massage, kisses, tickling games) or facilitating situations which unnecessarily result in close physical contact with a child or young person
- Inappropriate use of physical restraint.

### Place
- *Inviting/allowing/encouraging children or young people to attend a staff member’s home*
- Allowing children and young people access to a staff member’s personal internet locations (e.g. social networking sites)
- *Attending children or young people’s homes or social gatherings*
- *Being alone with a child or young person outside of 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 or young people
- Undressing using facilities set aside for children or young people, or in their presence (*without the Headmaster’s authority*)

### Targeting individual children and young people
- 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 or responsibilities
- Offering overnight/weekend/holiday care of children and young people as respite to parents

### Role
- Adopting an on-going welfare role that is beyond the scope of their position or that is the responsibility of another staff member (e.g. counsellor) or an external professional, and that occurs without the permission of the Headmaster.
- Photographing, audio recording or filming children or young people via any medium when not authorised by the Headmaster to do so without the required parental consent
- Using personal rather than school equipment for approved activities, unless authorised by the Headmaster to do so

### Possessions
- Correspondence or communication (via any medium)
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 Headmaster by 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 Headmaster
• Uploading or publishing still/moving images or
audio recordings of children and young people
to any location, without the Headmaster’s
consent.

St Peter’s College will prevent boundary transgressions by:

• Clearly articulating the School’s Child Protection Policy

• Clearly articulating the School’s Staff Code of Conduct

• Discussing with staff to identify unknown “grey areas”

• Ensuring buy in from the Senior Leadership Team and Middle
  Management

• Ongoing supervision and guidance

• Intervening early to prevent boundary crossings escalating to
  boundary violations.

St Peter’s College will protect all staff and volunteers by:

• Training staff and volunteers about professional boundaries

• Clearly articulating professional boundaries

• Ensuring the Staff Code of Conduct is used as guidance to all staff
  and that staff know it is there to protect them, not punish them

• Making staff aware of the consequences of breaching the code of
  conduct

• Empowering staff to seek advice

• Encouraging openness and transparency.

• Empowering students to recognise and report adult conduct which
  breaches these boundaries identified or makes them feel
  uncomfortable.
Staff will be encouraged to ask themselves the following questions which will assist them in their application of professional boundaries:

- How might this interaction be perceived by others?
- Am I treating this student differently from others?
- Can I achieve the same outcome through different interaction?
- Would I do or say this if a colleague were present?
- Would I condone my conduct if I observed it in another adult?
- What guidance would my Principal give me in this situation?

5. Staff Code of Conduct in relation to Child Protection

It is expected that all staff and volunteers at St Peter's College will commit and align themselves to the professional boundaries described above. The professional boundaries provide a fundamental framework for the Code of Conduct for all staff. In addition to the adherence of these professional boundaries, the following areas of professional conduct will be expected for all staff and volunteers. This section should also be read in conjunction with the St Peter’s College Behaviour Management Policy & Procedure https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

a. Appropriate physical contact by a staff member to assist or encourage a child or young person

At times, staff will be required to give practical assistance to a child or young person who is hurt or needs particular assistance or encouragement. Examples of appropriate physical contact are:

- administration of first aid
- supporting children and young people who have hurt themselves
- assisting with the toileting and personal care needs of a disabled child or young person (an individual plan for children and young people with needs must have been negotiated with parents)
- non-intrusive gestures to comfort a child or young person who is experiencing grief and loss or distress, such as a hand on the upper arm or upper back
b. Good practice for physical contact with school-age children and young people

- Seek children and young people’s permission to touch (keeping in mind that a highly distressed child or young person may be incapable of expressing their wishes).

- Avoid being with a child or young person in a one-to-one, out of sight situation, and never touch a child or young person in such a situation.

- Do not presume that physical contact is acceptable to a particular child or young person. Even non-intrusive touch may be inappropriate if a child or young person indicates she/he does not wish to be touched.

- Respect and respond to signs that a child or young person is uncomfortable with touch.

- Use verbal directions rather than touch (e.g. ask a child or young person to move in a particular way, rather than physically place the child or young person in the required position).

- Use the above approach for demonstrations in dance, sport, music and drama. Where touch is essential for safety reasons (e.g. with aquatic or gymnasium instruction), always tell the child or young person that you need to hold him/her in a particular way and seek his/her permission to do so.

- In some circumstances, staff may need to discourage younger children from inappropriate expectations of hugs or cuddles. This should be done gently and without embarrassment or offence to the child.

c. Good practice for physical contact with children, birth to school age

Staff working in preschools and care settings are often involved in toileting children, changing their clothes and comforting them for a range of distresses normal in the preschool age group. In providing such care, staff should be aware of the following good practice:

- When children indicate they want comfort, ensure that it is provided in a public setting and that it is in keeping with the...
CHILD PROTECTION POLICY

highest guidelines provided above.

- Signs of discomfort in children such as stiffening, pulling away or walking away must be respected. In these situations the child must continue to be observed/monitored until his/her distress is managed.

- Children must not be left in states of high distress for long periods. Parents need to be contacted under these circumstances.

- Staff should follow the site’s toileting and nappy changing policy and individual toileting plans where these have been documented with parents.

- In centres, it is important that formalised plans for responding to critical toileting situations and other challenging behaviours are understood by staff and parents.

d. Non-physical intervention in managing behaviour

Non-physical intervention is the recognised means of managing the behaviour of children and young people. Where a problem with a child or young person’s behaviour becomes apparent, non-physical interventions include:

- directing other children and young people to move away from the situation

- talking with the individual child or young person (asking the child or young person to stop the behaviour, and telling the child or young person what will happen if he/she does not stop)

- directing the child or young person to a safe place

- directing other children and young people to a safe place

- following the emergency plan

- sending for assistance from other staff, or in extreme cases, the police.

Use of verbal directions is always preferred to physical intervention. It is not appropriate to make physical contact with a child or young person (e.g. pushing, grabbing, poking, pulling, blocking) in order to ensure they comply with directions. Staff working with preschool-age children must not hold children against their will (e.g. on their laps, between their legs or on the floor) to ensure attention at group time. Under no circumstances should staff engage in any form of conduct which might cause
CHILD PROTECTION POLICY

physical or emotional harm to children and young people

e. **Physical restraint where a child or young person’s or adult’s safety is threatened**

Staff may make legitimate use of physical restraint if all non-physical interventions have been exhausted or are impossible in the circumstances and a child or young person is:

- attacking another child or young person or adult
- posing an immediate danger to him/her or others.

Staff are to use physical restraint only as a last resort and not as a response to:

- property destruction
- disruption to the education or care activity
- refusal to comply
- verbal threats
- leaving a classroom or the School
- a need to maintain good order

unless *someone's safety is threatened*.

Use of appropriate physical force may be permitted to ensure that the employer’s duty of care to protect children and young people and staff from foreseeable risks of injury is met. Common law defences such as self-defence and defence of others remain legitimate reasons for the use of physical restraint. All people have the right to defend themselves against an attack provided they do not use a disproportionate degree of force to do so.

It may be a valid decision for staff not to use physical restraint in a situation involving several children and young people, or a physically larger child or young person, where staff believe that doing so would increase the likelihood of injury to them. In such cases, the staff member should shepherd other children and young people away from danger and seek immediate help from other staff or police.

Staff are not expected to place their own safety at risk in responding to violence or aggression in others and are supported by Workplace Health and Safety legislation in making this judgement.

f. **Safe practice when using physical restraint**
The use of restraint with a child or young person in situations where the safety of others is threatened is to prevent injury. The restraint must be reasonable in the particular circumstances and must be in proportion to the circumstances of the incident. It must always be the minimum force needed to achieve the desired result, and take in to account the age, stature, disability, understanding and gender of the child or young person. For example, if restraining a female, care should be taken to avoid contact with breasts.

Parents should be informed at enrolment of the site’s policy on physical restraint with children and young people and staff that may be expected to use physical restraint should access the appropriate training.

<table>
<thead>
<tr>
<th>Do</th>
<th>Don’t</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Continue talking with the child or young person throughout the incident. Make clear that physical restraint will stop when it ceases to be necessary to protect the child or young person or others.</td>
<td>Don’t use restraint that involves:</td>
</tr>
<tr>
<td>• Grip clothing rather than the body, whenever possible.</td>
<td>• Force applied to the head or neck</td>
</tr>
<tr>
<td>• Document incidents promptly and keep these records with the Headmaster.</td>
<td>• Restrictions to breathing</td>
</tr>
<tr>
<td>• The records should include:</td>
<td>• Punching</td>
</tr>
<tr>
<td>o The name of involved children and young people</td>
<td>• Kicking</td>
</tr>
<tr>
<td>o Location of incident</td>
<td>• Holding by the hair or ear</td>
</tr>
<tr>
<td>o Name of witnesses (staff and/or children and young people)</td>
<td>• Confining the child or young person in a locked room or limited space</td>
</tr>
<tr>
<td>o Incident outline (including the child or young person’s behaviour, what was said, steps taken, degree of force applied and how applied, reasoning for actions taken)</td>
<td>• Placing children under school age in ‘time out’ or ‘time away’</td>
</tr>
<tr>
<td>• Inform parents promptly and fully of any incident involving the physical restraint of their child and provide them with the opportunity to discuss the matter at the time they are informed.</td>
<td></td>
</tr>
<tr>
<td>• Ensure school guidelines regarding other forms of documentation are followed, for example incident notification forms.</td>
<td></td>
</tr>
<tr>
<td>• Provide / offer confidential debriefing, counselling support (via the Employee Assistance Program) and Workplace, Health and Safety documentation to all staff involved in incidents of restraint.</td>
<td></td>
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</tbody>
</table>

Also refer to the Values @ Saints – A Toolkit for Living and Embedding Saints Values in everything we do, for the School’s over-arching Staff Code of Conduct (Point 11, Page 8)
6. Using social networking sites

Staff at St Peter’s College are expected to model responsible and respectful conduct to children and young people with whom they work. Staff need to consider the electronic social environments they utilise as part of this community and employer expectation. The internet does not provide the privacy or control assumed by many users. Staff must appreciate that no matter what protections they place around access to their personal sites, their digital postings are still at risk of reaching an unintended audience or threaten their employment.

Staff should be aware of the following expectations in considering their use of social networking sites:

- they have considered the information and images of them available on their sites and are confident that these represent them in a light acceptable to their role in working with children and young people.

- they do not have children or young people in the School community as ‘friends’ on their personal/private sites.

- comments on their site about the School workplace, colleagues or children or young people, if published, would not cause hurt or embarrassment to others, risk claims of libel, or harm the reputation of the school, their colleagues or children and young people.

Refer to the St Peter’s College Staff Network, Email and Internet Policy

https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

7. Working one-to-one with children and young people

The following summary of expectations applies to all situations where staff and volunteers are providing one-to-one learning assistance or feedback, behaviour assistance/monitoring, testing or assessment:

| Make it public | • the more visible, public and busy the location the better |
| Make it authorised | • parents should be informed/give consent |
| | • activity must be authorised by the Head of School |
| Make it timely | • as far as possible, provide support during normal work hours, and do not conduct excessively long sessions. |
8. Managing privacy expectations

Counsellors, pastoral care coordinators, health providers and various professional service providers rely on different ways on being able to provide a degree of privacy for children and young people. This may be to protect the child or young person’s dignity, to provide an environment conducive to the service/assessment being provided or to respect the child or young person’s desire for confidentiality. Children and young people will often assume a high level of confidentiality when disclosing serious issues or a personal nature or reporting harassment or bullying. For these reasons, the School needs to find a careful balance between, on the one hand, respecting the sensitive and private nature of counselling or service provision and, on the other hand, the professional’s duty of care obligations for the safety and well-being of the child or young person.

There is no legal confidentiality between School employees and students that overrides any obligation to report matters of concern about any student to the Headmaster. Good practice in managing these circumstances is the following:

- health/physical care should be provided with respect for the child or young person’s dignity and in manner approved by the child or young person and his parents.

- counselling should be provided in unlocked rooms with part-glass doors (where possible) that are located near staff traffic areas.

- avoid out of hours contact. If out of hours contact is required, the Head of School should be informed.

- while parental consent is often not applicable in many counselling situations, best practice is to provide all parents with written information about the school’s counselling and pastoral care services which outlines confidentiality and privacy issues.

- ensure student appointments and counselling notes are documented appropriately.

Refer St Peter’s College Privacy Policy

https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

9. Conducting home visits

Staff must ensure they follow the specific home visiting protocols that apply at the School. The key principle is that a home visit should place
no-one at unreasonable risk and that identified minor risks are consciously managed. A summary of general expectations is provided below:

<table>
<thead>
<tr>
<th>Inform</th>
<th>- Home visits must be authorised and documented by the Headmaster and the School must have information about them and where visits are being undertaken and the expected return times.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prepare</td>
<td>- All available information about the safety or the proposed visit must be considered and risks managed</td>
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<tr>
<td></td>
<td>- ID should be visible.</td>
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<tr>
<td></td>
<td>- Inform parents of intended visit, where appropriate.</td>
</tr>
<tr>
<td>Protect</td>
<td>- Do not enter the house if parents are not at home</td>
</tr>
<tr>
<td></td>
<td>- Speak with the student where the parent is present or clearly visible: do not interview students in their bedrooms.</td>
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<tr>
<td></td>
<td>- Have a colleague accompany if problems are anticipated.</td>
</tr>
<tr>
<td></td>
<td>- Document the visit.</td>
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</tbody>
</table>


Child-focused communication systems create a safer environment as children and young people become more empowered to speak up about what makes them feel safer, and when they are concerned for their safety or welfare.

The following strategies will enable the children and young people to have more confidence in asserting themselves when their safety and welfare is being challenged:

- A personal safety strategies program can be included in the curriculum of the Junior School and Senior School.
- The roles of teachers will be explained to students and how they can access these people to discuss any concerns they have if they feel unsafe or harmed.
- Students will be educated on the Child Protection Policy and in particular, how they can use the reporting process to raise any concerns they have for their safety and welfare and also the safety and welfare of any children in the school.
- Communication with parents, where teachers and parents can work together to ensure the safety and well-being of the children and young people.
11. Working with Children and Young People with Additional Needs of Disabilities

All sections of this policy require careful interpretation when applied to children and young people with additional needs or disabilities. For example, children and young people with intellectual disabilities may engage in a much wider range of physical and overtly sexual behaviours towards staff and other children and young people as a result of their disability.

Similarly, staff will need to engage more often in physical contact and touch with these children and young people as a means of meeting their duty of care to them. In fact, touch itself may be an agreed form of communication between a child or young person, his/her parent and staff where the child or young person has a communication disability.

Children and young people with disorders causing violent and unpredictable behaviours are likely to have formalised restraint procedures agreed to by staff and parents/carers. Toileting assistance or processes for changing clothes will be necessities for some children and young people.

Because of these differences, staff need to be more vigilant and thoughtful in their physical interactions with children and young people with additional needs of disabilities. Children and young people with disabilities are over-represented in the child protection system. Their vulnerabilities mean they have increased reliance on the adults providing their care to protect them from harm. Immediately reporting any inappropriate behaviour towards children or young people from other adults is a critical obligation of staff and one that must not be delayed, minimised or delegated.

Education and care staff support children and young people with disabilities or special needs through various forms of individual plans. The common features of these plans are that they involve all people who deal with the child or young person on a regular basis, including other service providers, and they document the agreed strategies that are to be used in supporting the child or young person. These plans are particularly important when challenging behaviours, personal care and hygiene and special physical considerations are an issue at the school (e.g. toileting, transport within and beyond the school environment, situations where physical restraint is occasionally required). The possibility of restraint and the nature of that restraint for children and young people should be addressed in the individual plan as should alternative strategies for preventing harm to others. The plan process should involve the child or young person as far as possible. Staff likely
to need to use physical restraint should access training specific to that requirement.

It is appropriate that different approaches are likely to be needed from staff in their interactions with children and young people with special needs or disabilities. For this reason, the School's behaviour code or behaviour management policies will be regularly reviewed to ensure they reflect the needs of the children and young people accessing the school at any one time. Nevertheless, the basic principles outlined elsewhere in this policy remain applicable to all children and young people. Staff have a duty of care to protect children and young people from physical and emotional harm and, while the ways of meeting the duty may differ for different groups, the duty itself remains unqualified. Staff are expected to meet this duty in a manner that respects the dignity of all children and young people as well as their vulnerabilities.

12. Cultural Considerations

Different cultures have different attitudes and traditions surrounding the concept of appropriate touch. Staff have a responsibility to become as familiar as possible with the values of the various cultural groups enrolled in Anglican schools. Many culturally based community organisations are very keen to inform staff about the values of their culture so as to establish optimum understanding and respect between parents, their children and staff at the school. It is critical that staff appreciate culturally specific expectations regarding touch so that embarrassment or offence can be avoided for everyone, particularly for children and young people.

There are some children and young people attending Anglican schools who have recently arrived in Australia. Some have backgrounds of severe trauma, ranging from the observation of extreme physical violence and abuse to being victims of such violence and abuse themselves. The needs of these children and young people and their families are acute and the issue of establishing what will be perceived as appropriate, helpful touch is, therefore, all the more essential. Staff need to employ considerable diplomacy, care and effort in their interactions with the children and young people and families that are known or suspected to have escaped traumatic circumstances.

The Anglican Diocese of Adelaide

The response of Anglican schools to sexual abuse is centred around a pastoral approach which aims to provide support to those involved. The framework that the Anglican Diocese of Adelaide uses to try and achieve a positive outcome for all concerned is called Healing Steps.
These guidelines outline how the Anglican Diocese of Adelaide can provide pastoral support and practical assistance to people who have been sexually abused in schools. *Healing Steps* is neither part of, nor a substitute for pursuing claims through a legal process. Rather it is an option which approaches claims from a pastoral perspective, toward a resolution appropriate to the circumstances of each individual. Individuals can be given support and encouragement by the Diocese to move on in healing, with whatever assistance the church can provide. The Professional Standards Director in the Anglican Diocese of Adelaide can be contacted on (08) 8305 9363 and healingsteps@adelaide.anglican.com.au

### The Headmaster

- The Headmaster’s role is initially **not** to investigate any disclosure or strong concern about the well-being of a student, but he **must** report the matter to the Families SA (FSA) through the Child Abuse Report Line – CARL on **131478**. In South Australia, it is the staff member or volunteer who is obliged by law to notify FSA if he/she suspects 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. The Headmaster should support staff in making a notification, even if the allegation is against the Headmaster.

- The Headmaster is responsible for all aspects of School management including the management of suspected or disclosed incidents of child abuse and neglect.

- The Headmaster must ensure that the School’s pastoral care and/or curriculum structures address the issue of child abuse and protective behaviours.

- The Headmaster must ensure that staff receive appropriate training in the detection and reporting of child abuse. Indicators of child abuse are to be found in Appendix A. Should allegations of any kind of abuse be made against the Headmaster, the staff member or volunteer should not inform the Headmaster but should go directly to the Chair of the School Council/Board.

- The Headmaster 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 Community and Social Inclusion (DCSI).

- Unless a parent is the accused person, The Headmaster will determine how and when parents are contacted after consultation with the Child Abuse Report Line. This should be done in a sensitive manner, taking into consideration the victim’s wishes.
Refer to the Managing Child Abuse Complaints Policy and Procedure.

- Should any disclosure or strong concern of abuse relate to the behaviour of a staff member or volunteer, the Headmaster must report the matter to the Professional Standards Director (PSD) in the Anglican Diocese of Adelaide. 8.2.7 The Association of Independent Schools of South Australia (AISSA) have practices for notifying other schools and sectors if an employee is suspended so that action is taken to seek to reduce the chance of that employee seeking employment in another school or sector. It is important for the Headmaster to make contact with AISSA if there are serious issues against an employee relating to sexual misconduct.

The Headmaster must retain all records of communication with FSA, the Police, the PSD and the subsequent actions. 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.

- The Headmaster 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 Headmaster will contact the police.

- The Headmaster, with the assistance of the appropriate Pastoral Care Staff (such as the Chaplain, Head of Senior School, Head of Junior School, Psychologist, Nurse, or Counsellor), will ensure ongoing support is provided for the teacher, student and anyone else affected by this process or its outcomes.

- The fundamental steps that should always be observed are for the Headmaster to notify immediately:
  - SA Police on 131444
  - Families SA (through the Child Abuse Report Line – CARL) on 131478
  - Parents of the victim, unless a parent is the accused person
  - The Professional Standards Director on (08) 8366 6589, Mobile: 0412 256 244
  - The Headmaster will determine how and when parents are contacted after consultation with the Child Abuse Report Line.
Staff and Volunteers

- A staff member or volunteer is mandated under legislation contained in Sections 6, 10 and 11 of the *Children's Protection Act 1993* (SA) and obliged by law to notify FSA (through the Child Abuse Report Line – CARL) on 131478 if he/she suspects on reasonable grounds that a child/young person 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.

- A staff member or volunteer must notify FSA of that suspicion as soon as practicable after he/she forms the suspicion. The maximum penalty for failure to notify is $10,000.00.

- 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. Refer to the St Peter's College Managing Child Abuse Complaints Policy & Procedure https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

- Staff and volunteers, who have concerns that abuse or neglect are occurring and once a suspicion is formed or as a result of a direct disclosure, must inform the Headmaster. They are to keep brief, written, dated notes of their suspicions or observations and give them to the Headmaster, 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.

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

- 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 abuse. This will include informing the Headmaster. (For detailed information about dealing with a disclosure, see Appendix B)

- Once direct disclosure has been made, the Headmaster (or his delegate) **must** be informed as soon as possible.

- Staff members and volunteers must not engage in general staffroom discussion about a disclosure. Staff and volunteers must maintain confidentiality except as required by their responsibility as a mandated notifier and as directed by the Headmaster.

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

- Should allegations of any kind of abuse be made against the Headmaster, the staff member or volunteer should not inform the Headmaster but should go directly to the Chair of the School Council/Board. The Chair shall then inform FSA. For more detailed information on responding to problem sexual behaviour in children and young people, go to:


**Families SA**

Families SA (FSA) is in the Office of Child Safety in the South Australian Government Department for Education and Child Development (DECD). Section 11 of the *Children’s Protection Act 1993* imposes a duty on staff and volunteers in schools to notify FSA if, in the course of their work, they suspect on reasonable grounds that a child had been abused or neglected. Abuse or neglect includes sexual abuse of a child or physical or emotional abuse of a child or neglect of a child. In practical terms, the duty to notify FSA is a duty to notify the Child Abuse Report Line (CARL) on 131478.

**SA Police**

When the allegation of sexual misconduct is made to a member of staff or volunteer, it should be reported to the Headmaster immediately. The Headmaster must immediately report the allegations to the SA Police on
131444. Police should not interview students (be they the victim 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.

**Media and Crisis Management**

1. **Media Management**

   All students, parents, staff and volunteers must refer any media enquiries directly to the Headmaster. It is the role of the Headmaster to manage and respond to any media enquiries on behalf of the School. If an allegation of abuse becomes public, the Headmaster will decide whether to issue a statement.

   In all dealings with the media, St Peter’s College 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 well-being of the members involved is not compromised.

   Refer to the St Peter’s College Media Policy
   https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

2. **Crisis Management**

   In the case of any report concerning the safety or welfare of a student being made, the Headmaster will inform those members of the School community who the Headmaster 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.

   The Senior Leadership Team together with the Headmaster will seek professional advice on the best way of delivering 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 St Peter’s College Critical Incident Management Policy & Procedure
   https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx

   Debriefing is a facilitated session, which encourages individuals to talk about (individually or in groups) or listen to others talk about, the event in a safe contained environment, leading to:

   - Better cognitive understanding of responses
CHILD PROTECTION POLICY

- Reduction in the inner confusion occurring as a consequence of the event
- Ability to express emotions in a contained safe place and/or
- Ability to recognise normalness of reactions.

(Deakin University 2003, Choose with Care 2004 Child Wise)

Internet Use

1. Policy and Procedures

St Peter's College will ensure that when students access the Internet, emails, SMS or any other social networking media within the School grounds, their safety and wellbeing will be of paramount consideration.

All students will read and accept, by signing, the School's ICLT Acceptable Use Policies and Agreement Form [https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx](https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx)

This policy helps students to understand their responsibilities and also aims to reduce any risk of their safety when using the School's computer network.

Students, parents, staff and volunteers should immediately report to the Heads of School or the Headmaster if they become aware of any inappropriate, suspicious and/or pornographic images, SPAM, emails or mobile phone cameras when the image or message being sent or downloaded to a computer at the School is suspicious, inappropriate, or concerning to the safety or welfare of students.

Students, staff and volunteers should not use SMS services to send inappropriate, pornographic or abusive messages to any member of the School community. A report should be made immediately to the Heads of School or the Headmaster if a member of the School community receives such a SMS message.

The St Peter's College eSmart Policy [https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx](https://keystone.stpeters.sa.edu.au/Pages/policies-docs.aspx) should also be used as a primary reference to identify the appropriate use of technology in the context of child protection.

2. Cyber Predators

Cyber-stalking is harassing behaviour using one or more of the platforms in the online environment. It can include frequent and intrusive threats, cryptic messages and sexual innuendo. Its usual goal is to create a sense of fear in the recipient based on control and intimidation.
Some adult predators pretend, by creating fake profiles with false ages and identities, to be a young person to befriend and gain the trust of young people online. According to the Australian Institute of Criminology, cyber-stalking can include:

- Sending repeated unwanted messages using email and SMS, or posting messages on blogs, profiles on social networking sites;
- Ordering goods and services on behalf of a victim that could result in legal and financial losses to the victim, including to her/his reputation;
- Publicising private information about a victim;
- Spreading false information;
- Gathering information online about a victim;
- Encouraging others to harass a victim; and
- Unauthorised access to a victim’s computer(s) or Internet accounts (e.g. email and social networking site accounts).


COMMUNICATION:

The Headmaster is responsible for promulgating this policy and procedure to all relevant staff.

This policy and procedure will be available on the School’s Information System - Keystone.

### POLICY HISTORY:

<table>
<thead>
<tr>
<th>Date Approved</th>
<th>Amendments made (summary of major changes)</th>
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<tbody>
<tr>
<td></td>
<td>Original Policy date February 2006</td>
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<tr>
<td></td>
<td>Major Revision made in November 2013 (based on SA Provincial Anglican Schools’ Child Protection Policy – Oct 2013)</td>
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<td>Formulated into School’s policy framework template.</td>
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<tr>
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<td>October 2014 – amendments made to Policy document as a result of Desk Audit of this and associated policies and procedures undertaken by external consultant in September 2014.</td>
</tr>
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</table>

### POLICY REVIEW:

The Child Protection Policy will be continually monitored. Any feedback received on the Policy should be directed to SPO's and the Headmaster. This feedback will be considered in the review of the
This Policy will be reviewed every 3 years.
Date for next review: 2016
APPENDIX A

Indicators of Child Abuse, Neglect and Family Violence (identified as part of the Responding to Abuse and Neglect Education and Care (RAN) training)

Below are summary lists of specific behavioural and physical indicators of abuse, neglect and family violence. These should be used as a guide only and applied with knowledge of age appropriate behaviours.

The key message about indicators is to appreciate patterns and clusters of behaviours. The best way to appreciate clusters is to always consult with senior staff and others working with the child/young person.

Possible behavioural indicators of children and young people experiencing abuse, neglect or family violence.

- Difficulty accepting responsibility for their behaviour
- Struggle when receiving any kind of feedback
- Difficulty in understanding the feelings of others
- Struggling to name the own feelings
- Damage to property, stealing property eg food
- Harm others without feeling remorse
- Appear to not follow rules
- Easily influenced by others
- Find it hard to trust
- Struggle to give reasons for their behaviour
- Trust too much and allow themselves to be exploited
- Withdrawn ‘absent’ manner
- Low self esteem
- Suffer sleep disturbance
- Act in ways that make others feel uncomfortable or stressed
- Change from calm to angry very quickly
- Struggle to be a part of group activities
- Difficulty making and keeping friends
- Run away
- Difficulty concentrating, remembering, learning
- Hyper-vigilant (seeming to constantly scan for threat)
- Sexual behaviour – inappropriate for age, inappropriately directed (eg at younger children or teacher) excessive, violent, coercive, compulsive, threatening.
- Tiredness
- Overly protective of younger siblings
- Unusually fearful of having nappy changed
- Wary of physical contact with others
- Age inappropriate bed wetting soiling or smearing
- Bullying and aggression
• Engage in high risk behaviours – alcohol/substance abuse, offending, self-harm
• Suicidal thoughts
• Chronic absenteeism / irregular attendance
• Unresponsive to ‘normal’ motivating teaching strategies.

Possible physical indicators of children and young people experiencing abuse, neglect or family violence

• Bruising, burns, scalds, lacerations, abrasions, fractures and broken bones
• Eating disorders
• Consistently dirty / unwashed
• Medically unexplained problems in eating or swallowing
• Delay in physical development
• Multiple injuries
• Urinary tract infections / sexually transmitted diseases
• Pregnancy
• Medical conditions related to poor hygiene
• Unattended physical conditions or illnesses
• Unexplained failure to thrive
• Evidence of hair being pulled out, bald patches.

Parent/carer behaviours as indicators

• Appear unconcerned about the child/young person’s condition/situation
• Believe in corporal punishment
• Belittle the child/young person
• Delay seeking medical help or advice
• Excessively critical of child/young person
• Favours other children/young people in family
• Ignorant of child/young person’s development stages and needs
• Inattentive
• Isolates child/young person from social and peer activity
• Low self esteem
• Does not attend site appointments
• Offers illogical accounts of injuries
• Poor impulse control
• Family violence
• Uses multiple health services for child/young person.
APPENDIX B

Dealing with a Disclosure
A student who discloses abuse 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 that these natural feelings are contained at the time as they may shut down disclosure. It is also important to ensure that these feelings are dealt with following the disclosure. Pastoral Care Staff (such as the Head of School, Head of House, House Mentor, School Chaplain, Psychologist, Nurse or Counsellor), may be of assistance in this regard.

It is not easy for students to disclose abuse 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 undertake any investigations i.e. ask leading questions or speak to other parties seeking verification. Open questions that invite information and do not put words into the student’s mouth, can assist the student to disclose and provide useful information to inform later notification.;
- 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.

**ARM (Act now – Record – Monitor)**

The ARM (Act now – Record – Monitor) process identified as part of the *Responding to Abuse and Neglect in Education and Care* Training clearly outlines the steps to be undertaken when dealing with disclosure. Staff will be supported to enact this process.

**APPENDIX C**

**The Legal Implications for Reporting**

Teachers have a duty of care to students during school hours and at other times when the teacher/student relationship exists. Duty of care falls under the area of common law that is established by the courts, on the basis of precedent. The concept of duty of care requires that a teacher must take reasonable care to avoid acts or omissions which the teacher can reasonably foresee would be likely to injure the student and take steps to remove those dangers.

In ascertaining what is reasonable for a teacher to have foreseen, the Courts would, amongst other matters, enquire into the:

• magnitude of risk;
• degree of probable occurrence; and
• difficulty in reducing the risk.

Where a teacher suspects a student is being abused/neglected the teacher should discuss his/her suspicions with the Principal who then has to judge whether to report the matter or not. In the case of a direct disclosure, the teacher is obliged by law to notify FSA (through the Child Abuse Report Line – CARL) on 131478 if he/she suspects on reasonable grounds that a child/young person 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.

Teachers may be reluctant to report suspected cases of child abuse and/or neglect because they are afraid of the effect this may have on their relationship with other students or the family of the child involved. If teachers make reports through the proper channels and with the best interests of the child in mind, they are protected in the event of legal action being taken against them and are entitled to invoke the defence of qualified privilege.

This may be interpreted as follows: If a person makes a statement that is possibly defamatory to another person with a 'like interest' but the first person has a legitimate interest, either legal or moral, in the situation, qualified privilege protects the first person. If a teacher makes a statement in good faith to the Headmaster or other authorities about a situation the teacher
suspects exists and which the teacher considers may be harmful to the child, a valid defence exists under common law.

The defence of qualified privilege does not cover general discussion in the Common Room, conversation with other parents or members of the general community. It should be noted that the defence of qualified privilege will not be available where complaints are made on spurious grounds, in bad faith, or without reasonable grounds to make the complaint. Teachers must follow the procedures set out in this document and maintain absolute confidentiality.

APPENDIX D

Questions and Concerns

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 Headmaster 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 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 Headmaster. 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 abuse and neglect. That is a matter for the appropriate prosecuting authority. All suspected cases of child abuse (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 abuse 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's Protection Act 1993 SA, Families SA and SA Police will not reveal the identity of persons notifying child abuse and neglect. 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. More detailed information on this matter may be found at http://www.families.sa.gov.au/default.asp?id=45065&navgrp=1663

It is important to note that the safety and welfare of the child is all important and that this is the primary concern of St Peter's College, the Anglican Diocese of Adelaide and Families SA. No action will be taken which may jeopardise the safety of the child.

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, St Peter's College will need to ensure that all members over 18 years in the proposed host family 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 and not the School to ensure that the members of the proposed host family have undergone screening and background checks.

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.

The School will be vigilant in ensuring that processes are in place for international students to effectively deal with and manage situations should abuse or neglect be suspected or disclosed, particularly given the contextual issues of cultural differences, difficulties communicating with distant family, and an unfamiliar legal system.
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, St Peter’s College will ensure that screening and background checks be undertaken by billeting families. This includes all adults (18 years and over) residing in the household. Screening and background checks remain valid for a period of three years. If special circumstances arise that constrain this process, a declaration by the billeting family asserting that there is nothing that would make their hosting of a child inappropriate is still, nonetheless, required.

When a St Peter’s College boy is billeted out to families/schools interstate or overseas (e.g. sporting trips), they must arrange a meeting with the School Counsellor(s) prior to leaving and participate in a protective behaviours discussion.

APPENDIX G

Boarding Houses

Staff working in boarding houses face particular challenges in providing a ‘home-like’ environment for children and young people in ways that do not compromise their professional boundaries or the welfare of children and young people.

Boarding houses should be relatively informal environments and places where children and young people can receive respectful guidance and support from the adults in whose care they are placed. While this clearly involves the development of caring, and sometimes close friendships, it does not remove the staff member’s responsibility to work within all the professional boundaries outlined in this policy document and to follow its best practical advice.

The guidance on managing privacy, working one-to-one, appropriate physical contact, responding to inappropriate sexual behaviour (in children (see Appendix I) or in adults), using social network sites, non-physical interventions and the examples of professional boundary violations are all particularly pertinent to boarding house staff.

Following these guidelines will support the important role that boarding house staff play in the well-being of children and young people and enhance the respectful relationships that should exist between children and young people and adults sharing a ‘home away from home’.
APPENDIX H

Outdoor Education

Outdoor Education in an important and positive experience; however, it can involve some higher risk activities. Whilst St Peter’s College 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 well-being of students, assess the degree of risk, and implement strategies to minimise the risk of harm occurring. The Risk Management Matrix (see below) can be used to conduct a risk assessment for each planned Outdoor Education activity.

<table>
<thead>
<tr>
<th>RISK</th>
<th>LOW</th>
<th>MEDIUM</th>
<th>HIGH</th>
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<td>Supervision</td>
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(Reproduced with permission – Volunteering Canada 1998, Choose with Care Child Wise 2004)

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

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 Headmaster 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 Headmaster 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 Headmaster 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 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: