Policy

Child Safe Policy

1. Purpose and Scope

Our Child Safe Policy outlines the key elements of our approach to child protection as a child safe organisation and sets the tone for Roseville College's entire Child Safe Program. It has been approved by the Anglican Schools Corporation (TASC) Board for implementation across TASC schools.

1.1 Our Commitment to Child Safety

We want all children and young people who attend Roseville College to be safe, feel safe, and to regard Roseville College as a trusted organisation. We are committed to providing a child safe and child friendly environment, where children and young people are listened to and are able to participate in decisions that affect their lives.

We have a zero tolerance for *child abuse* and are committed to doing what we can to keep students safe from harm.

The **College** regards its child safety responsibilities with the utmost importance and is committed to providing the resources required to ensure compliance with all relevant child protection laws and regulations and maintaining a child safe culture.

1.2 Application and Scope

The College Child Safe Policy applies to all adults in the College community, including employees, volunteers, contractors, external education providers, parents/carers and other family members. This policy applies in all College environments, both physical and online, and on-site and off-site College grounds (e.g., camps and excursions).

The College may also respond to conduct occurring outside School environments where there is a sufficient connection to the School, its students, workers or activities, and where the conduct may affect the safety, welfare or wellbeing of students or the School's ability to provide a child safe environment.

Where the term student is used in this Policy, it is referring to all students enrolled at the College regardless of age. Words *italicised* in this policy are defined in Section 10.

2. Child Safe Standards

The College Child Safe Policy and the broader program of works to implement the Policy (our Child Safe Program) has been developed taking into account the NSW Child Safe Standards, which in turn are based on the National Principles for Child Safe Organisations developed by the National Office for Child Safety in response to recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse. The Child Safe Standards are:

1. Child Safety is embedded in organisational leadership, governance and culture.
2. Children participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved.
4. Equity is upheld and diverse needs are taken into account.
5. People working with children are suitable and supported.
6. Processes to respond to complaints of child abuse are child focused.
7. Employees are equipped with the knowledge, skills and awareness to keep children safe through continual education and training.
8. Physical and online environments minimise the opportunity for abuse to occur.
9. Implementation of the Child Safe Standards is continuously reviewed and improved.
10. Policies and procedures document how the organisation is child safe.

3. Student Participation, Family Engagement and Inclusion

Roseville College is a child safe and child-centred organisation. We seek to provide a friendly and welcoming environment for students. We recognise that students are more likely to raise concerns and seek support where they are listened to, treated respectfully, and encouraged to participate in decisions that affect them. We also recognise the importance of working constructively with families and considering the needs of students from diverse backgrounds and with differing needs.

3.1 Student Voice and Participation

We seek to provide students with opportunities to express their views and participate in decisions that affect them. We also recognise the importance of friendships to students, and support from peers is encouraged.

We have simple and accessible information and processes in place to assist all students to develop appropriate knowledge and skills to identify and communicate when they do not feel safe.

The College will educate students on respectful relationships, their rights and how to speak up and report concerns. This will be achieved by:

- Facilitating developmental age-appropriate conversations about consent, sex and abuse, online safety, and how adults and children should behave, including healthy and respectful relationships
- Ensuring students can raise concerns with the College about safety, abuse or other harm through maintaining accessible student friendly and culturally safe reporting systems throughout the College.
- Providing First Nations students with culturally safe opportunities to express their views, raise concerns and participate in decisions affecting their safety, wellbeing and education, and recognising that trusted support people for students may include extended family members, Elders, community representatives or other persons identified by the student and their family
- Regularly communicating and consulting with students, including seeking and considering feedback from students when reviewing child safety policies, practices and reporting processes, and taking reasonable steps to ensure that younger students, students with disability and other vulnerable students can participate in ways that are meaningful and accessible to them.

3.2 Involving and Informining Families and Our Community

The families of our students have primary responsibility for raising their children and we recognise the importance of keeping families informed and engaged in the School's approach to child safety.

The College will seek to consult with key stakeholders, including students, families and the broader community, on child safety and our processes and practices. This includes engaging with First Nations communities, families, elders, community controlled organisations and other relevant representatives, where appropriate, to better understand and consider and address the impact of policies, practices and procedures on First Nations children, their families and communities.

The College will also seek to involve First Nations students, their families and identified support persons in decisions affecting the safety, wellbeing and support of First Nations students. We recognise that culturally appropriate engagement practices may vary between communities and locations, and seek to engage in locations and settings identified by community members as safe, welcoming and appropriate.

The College will make our Child Safe Policy, Code(s) of Conduct, and our Complaints Handling Program and related procedures for managing child safe incidents and allegations of reportable conduct available on the College's public website to ensure that they are readily accessible to all members of the Community.

3.3 Respecting Diversity and Promoting Equality

Roseville College respects diversity and promotes equality and equity. We recognise that students have diverse needs, abilities and backgrounds, and that some children and young people may be more vulnerable because of their background, life experience or their sexuality or gender.

We seek to understand the needs of students with the aim of providing them with reasonable support so that they are able to appropriately participate in College life, feel culturally safe, and know that they are valued and welcome. We consider the additional risks to safety that students with diverse needs, abilities and backgrounds may face and implement strategies to address these risks.

The College recognises and respects the cultural identity, traditions, practices and lived experiences of First Nations students, families and communities. We acknowledge that some First Nations people may have experienced historical and intergenerational trauma associated with educational and other institutions and are committed to fostering culturally safe environments that build trust, respect and inclusion. This includes acknowledging the significance of cultural obligations and practices such as Sorry Business and responding sensitively and appropriately to the needs of students and families during these times.

4. Suitable and Supported Workers

The College seeks to ensure that people working with children are suitable for their role, understand their child safe responsibilities and are equipped to identify, prevent and respond appropriately to child safety concerns.

4.1 Suitable Screening and Workforce Management

When engaging and managing our workers (including employees, volunteers and contractors), Roseville College takes proactive steps to ensure people are suitable for their roles, including by:

- Requiring all workers and governors to hold and maintain a valid Working with Children Check (WWCC) clearance from the Office of the Children's Guardian (OCG), in accord with our Working with Children Check Procedure – TASC extends this

organisational child safety requirement to persons who may not otherwise be legally required to hold a clearance

- Verifying, recording and monitoring WWCC clearances in accordance with legislative requirements
- Undertaking screening measures, including reference checks, to assess the suitability of all employees and governors with regard to working with children
- Undertaking screening measures to assess the suitability of volunteers or contractors who have direct contact with students to confirm suitability for working with children
- Communicating child safe expectations through employment, engagement and volunteer management processes
- Providing appropriate supervision and performance monitoring for all employees and for volunteers and contractors who have direct contact with students, and
- Responding appropriately where concerns are raised regarding a worker's conduct or compliance with child safe requirements.

Our Child Safe Human Resources Management procedures and Working With Children Check Procedure provides further information to enable compliance with the Policy.

4.2 Child Safe Induction, Training and Education

Roseville College requires all workers to complete induction in our child safety policies, practices and procedures.

Employees and governors are provided with a copy of this Policy and required to acknowledge that they have read and understood the Policy and related procedures and codes of conduct as part of their induction process.

New employees and other workers who undertake child-related work (including Direct Contact Contractors and Direct Contact Volunteers) must complete child safe training, ideally prior to commencement, but no later than one month after commencement if approved by the College Principal.

All employees at the College and all Corporation governors and other workers who undertake child related work (including Direct Contact Contractors and Direct Contact Volunteers) must complete mandatory child safe refresher training at least every 12 months, and any other training, as required by the College Principal. Additional role-based training needs will be assessed, and specific training provided to meet the specific needs of roles, including, for example, additional targeted training for Child Safe Officers. The College will assess training requirements using the TASC Training Needs Analysis tool.

The College will monitor the completion of training and report completion rates to the School Council. Our Child Safe Training, Supervision, Performance Monitoring and Professional Development procedure provides further information on training requirements and how monitoring of training occurs.

The College provides all other workers and visitors with information on child safe codes of conduct, legal obligations and how to report child safe incidents or concerns to the College or to relevant external authorities through posters, our website or other means.

5. Risk Management

Anglican Schools Corporation and Roseville College recognise the importance of a risk management approach to minimising the potential for child abuse or harm to occur, and we use this information to inform our policies, procedures and activity planning. As part of our broader duty of care to students, we take reasonable precautions to prevent foreseeable harm to children and young people and implement systems, supervision, training, risk management and reporting mechanisms designed to fulfil that duty.

The College has implemented the Anglican Schools Corporation Risk Management Framework to assist in the identification, assessment and management of child safety risks in all College environments.

We identify, assess and manage Child Safe risks in all school environments based on a range of factors, including:

- the nature of our College's activities,
- physical and online environments (including the use of digital technologies and artificial intelligence, online learning platforms, social media, electronic communications and personal devices), and
- the characteristics of the student body.

We document child safe risks and risk management plans, and regularly review child safe risks and controls, as required under the Risk Management Framework.

6. Responding to Child Safety Incidents or Concerns

Child safety concerns may arise in relation to student wellbeing, reportable conduct, harmful sexual behaviours, breaches of child safe expectations or other matters affecting the safety, welfare or wellbeing of students.

Roseville College will take appropriate, prompt action in response to child safety incidents or concerns, including all complaints, allegations or disclosures of abuse or other harm made to the College. We seek to ensure our processes for handling disclosures and complaints are child-focused, culturally safe and age-appropriate, and include access to trusted support persons, protections from victimisation, and options for anonymous reporting where appropriate.

Immediate Danger?
If there is an immediate danger to a student or other child or young person and the College Principal or next most senior employee is not contactable, the employee should contact the Police (000) and/or the Child Protection Helpline (13 21 11) directly and then advise the College Principal or next most senior employee (at the College Principal) as soon as possible.

Worker Responsibilities for Reporting Concerns

Workers at Roseville College are required to:

- prioritise the safety, welfare and wellbeing of students
- promptly report any child safety incidents or concerns to the College Principal or a designated Child Safe Officer (refer Figure 1)
- if the child safety concern relates to the conduct of the Principal, report the concern to the TASC Chief Executive Officer (refer section 6.2)
- maintain confidentiality and only share information with the College Principal and any other person the College Principal nominates (such as a Child Safe Officer or persons investigating the concern), and, if required, authorised agencies such as the DCJ, Police or OCG.

Workers are not required to and must not undertake their own investigation of child safety incidents or concerns. However, all Workers need to be aware that it is a criminal offence to conceal a child abuse offence or fail to report information to police that may materially assist police in relation to a child abuse offence. Internal reporting under this Policy does not remove any obligation imposed by law.

The College Child Safe Officer(s) are:

Name	Position	Contact No.	Email Address
Kester Lee	Deputy Principal	02 9884 1100	deputy@roseville.nsw.edu.au
Michelle Kay-Browning	Head of Senior School	02 9884 1100	headofseniorschool@roseville.nsw.edu.au
Abi Woldhuis	Head of Junior School	02 9884 1100	headofjuniorschool@roseville.nsw.edu.au

Figure 1 – Our Child Safe Officers

College Responsibilities for Responding to Concerns

The College's response to child safety incidents or concerns will include:

- assessing and managing any immediate and ongoing risk to student safety
- taking reasonable steps to protect and support students connected to the child safety incident or concern until it is resolved and providing ongoing support to those affected
- externally reporting all matters that meet the required relevant thresholds to the Department of Communities and Justice (DCJ) (Mandatory Reports), the Police (criminal matters including child abuse offences), and/or the OCG (Reportable Conduct), depending on the issues raised
- fully cooperating with any resulting investigation by an external agency
- sharing or requesting information from external people or agencies as permitted or required under the law
- securing and retaining records of the child safety incident or concern and the College's response to it
- taking broader actions to improve child safety at the College(including systemic reviews and resulting improvements).

Confidentiality and Information Sharing

Information relating to child safety incident or concerns, including allegations of reportable conduct, may only be shared with authorised persons where necessary to promote the safety, welfare or wellbeing of a child, or to comply with legal obligations, or to support an investigation or risk assessment.

All child safety records will be managed, retained and disposed of in accordance with applicable legal requirements, privacy obligations, and College records management procedures. Access to such records will be restricted to authorised personnel.

6.1 Student at Risk of Significant Harm and Other Wellbeing Concerns

Risk of Significant Harm (ROSH) refers to serious concerns about a child or young person's safety, welfare or wellbeing arising from abuse, neglect, exposure to violence, unmet care needs, significant psychological harm, or other circumstances that may place them at risk of harm. Further information is provided in section 10 Definitions.

All teachers are mandatory reporters under the Children and Young Persons (Care and Protection) Act 1998 NSW (the Act) and some other workers may also qualify as mandatory reporters under the Act (refer Definitions). Mandatory reporters are legally required to make a report if they have reasonable grounds to suspect a child (under 16 years of age) is at Risk of Significant Harm. Roseville College uses a centralised reporting process under which concerns are ordinarily reported to the College Principal and/or Child Safe Officers for assessment and reporting. Centralised reporting is best practice, enabling a more holistic view of matters related to a student and assuring appropriate action. However, this process does not remove a mandatory reporter's personal obligation to ensure that a report is made to DCJ where required by law.

All workers at Roseville College should immediately report to the College Principal or a designated Child Safe Officer (refer Definitions) if they have reasonable grounds to suspect that a student is at risk of significant harm or they have any other wellbeing concerns regarding a student. Child Safe Officers must inform the College Principal of any report as soon as possible. Workers are not permitted to inform the parents or caregivers that a report to the DCJ has been made.

The College Principal/Child Safe Officer will:

- Make an assessment to determine whether there are reasonable grounds to suspect that the child or young person is at risk of significant harm, using the DCJ Mandatory Reporter Guide (MRG), and retain a copy of the MRG outcome (regardless of whether the outcome is to make a mandatory report to the DCJ) in a secure location
- Make relevant mandatory reports to the DCJ and, if required, the Police
- Determine what action must be taken within the College community to support and protect the student.

However, if the College Principal does not agree with the mandatory reporter's view that a child or young person is at Risk of Significant Harm, having worked through the DCJ NSW Mandatory Reporter Guide, and the mandatory reporter remains of the view that the child or young person is at Risk of Significant Harm, the mandatory reporter has a legal duty to

make a report to the DCJ. It is also a criminal offence for any adult to conceal a child abuse offence or fail to report information that may materially assist police in relation to a child abuse offence.

A worker may have a wellbeing concern for a student that does not meet the threshold of risk of significant harm or where the student is not a child or young person. Such concerns must still be reported to the College Principal or Child Safe Officer to enable:

- Assessment of concerns in conjunction with other information of which the College Principal or Child Safe Officer may be aware,
- Determining whether the College should take action to support and protect the wellbeing of a student, regardless of whether the risk of significant harm threshold has been met.

Our Procedures for Responding to and Reporting Child Protection Concerns provides additional information.

6.2 Reportable Conduct and Other Inappropriate Behaviour

Reportable Conduct has the meaning given under the Children's Guardian Act 2019 (NSW) and includes certain conduct by employees (as defined by the Act) towards children, such as sexual misconduct, sexual offences, assault, neglect, ill-treatment and behaviour causing significant emotional or psychological harm to a child. A child is defined as a person under the age of 18 years and does not have to be a student at the College. Further information is provided in Section 10 Definitions. *For the purposes of this policy, concerns about the conduct of any worker at the* College *must be reported.*

A *worker* at the College who has any concern about any other *worker* at the College engaging in conduct that is considered inappropriate or is *reportable conduct* must report their concerns to the College Principal as soon as possible.

Workers must also report immediately to the College Principal if they become aware of any allegation of inappropriate conduct or *reportable conduct* in relation to themselves.

The conduct does not have to have occurred at or in the course of the *worker*'s work at or for the College.

Where it is uncertain if the conduct is *reportable conduct* but is considered inappropriate behaviour, this must also be reported. This includes any behaviour that is not in accordance with the College's codes of conduct and professional boundaries.

Workers must also report to the College Principal if they become aware that a *worker* has been charged with or convicted of an offence (including a finding of guilt without the court proceeding to a conviction) involving *reportable conduct*. This includes information relating to the *worker* themselves.

If the concern or allegation involves the College Principal the *worker* must make a report to the Anglican Schools Corporation CEO (ceo@tasc.nsw.edu.au). If the allegation involves the CEO, a report must be made directly to the Children's Guardian. The Your Call Disclosure Management Service is also available (Figure 2).

The **Your Call** service reporting options include: https://www.yourcall.com.au/report *Telephone* 1300 790 228 9am and 12am, recognised business days, AEST Online reports can be made via the website address listed above. You will be required to enter the Corporation's unique identifier code: **ASC**

Figure 2 - Your Call Disclosure Management Service

Head of Relevant Entity Responsibilities

The College Principal, as the delegated Head of Relevant Entity under the Children's Guardian Act 2019, or the TASC CEO as Head of Relevant Entity, must submit a 7-day notification form to the OCG within 7 business days of becoming aware of a reportable allegation or conviction against a *worker* (unless the Head of the Entity has a reasonable excuse) and then investigate the allegation of *reportable conduct* in accordance with our **Reportable Conduct Policy and Procedure.**

The Principal (or CEO) must provide the following information about an investigation into a reportable conduct allegation or conviction to the child/children about whom the information relates and/or their parents or authorised carer(s):

(a) information about the progress of the investigation,

(b) information about the findings of the investigation,

(c) information about action taken in response to the findings.

The Principal (or CEO) must assess and manage any risks an employee may pose to children while responding to reportable allegations, and also manage risks to the employee who is the subject of the allegation, the integrity of the investigation process, other parties and the school. At a minimum, a risk assessment must be completed (and documented):

- On receipt of a reportable allegation
- As new information becomes known, and
- At the end of the investigation.

The College Principal (or CEO) will ensure that the principles of natural justice and procedural fairness are followed throughout any investigation into allegations against a

worker. This includes, but is not limited to, allowing workers, who are the subject of reportable allegations or of a reportable conviction, to make a written submission about the reportable allegations or convictions during the investigation or determination on the matter.

Where alleged behaviour is inappropriate but does not meet the threshold of a reportable allegation, the College Principal will take appropriate action to investigate the allegation(s), applying the principles of natural justice and procedural fairness, and determine what actions is required to address the allegation(s) if proven.

Our Procedures for Responding to and Reporting Child Protection Concerns and Reportable Conduct Policies and Procedures provide additional information.

6.3 Recognising and Reporting Harmful or Concerning Sexual Behaviour in Students

College employees respond to a range of student behaviour as a part of their everyday role at the College. It can be hard to distinguish between developmentally appropriate sexual behaviours and harmful sexual behaviours. It may be difficult to know if there is a problem and, if there is, how best to respond.

As a general guide:

- Harmful "Red light" sexual behaviours are those that are problematic or harmful, forceful, secretive, compulsive, coercive or degrading. These behaviours signal the need to provide immediate protection and follow up support
- Concerning "Orange light" sexual behaviours are those that are outside normal behaviour in terms of persistence, frequency or inequality in age, power or ability. These behaviours signal the need to monitor and provide extra support
- Age-appropriate "Green light" sexual behaviours are those that are normal, age-appropriate, spontaneous, curious, mutual, light-hearted and easily diverted experimentation. These behaviours provide opportunities to talk, explain and support.

For further guidance on identifying and reporting concerning or harmful sexual behaviour, refer to our **Recognising and Responding to Sexual Behaviour in Children and Young People Procedure.**

All sexual behaviour displayed or disclosed by students, whether it is age-appropriate, concerning, or harmful, requires some level of information, support and a proactive response from the College. Responding to a student with harmful sexual behaviours involves considering the College's duty of care to any student who is an alleged victim and to the student who may be exhibiting harmful sexual behaviours.

Workers are required to report immediately to the College Principal or a designated Child Safe Officer any incident where a student is exhibiting Harmful or Concerning Sexual

Behaviour. This may include behaviour outside the College which has the potential to impact on student relationships or wellbeing.

If such behaviour is directed toward another student, immediate steps must be taken to protect the other student.

The College Principal or a designated Child Safe Officer will determine actions to be taken, based on an assessment of the behaviour outlined above, which may include:

- Where the behaviour is directed at another student, reporting the matter to the Police and/or DCJ
- Plans to support the student exhibiting Harmful or Concerning Sexual Behaviours and any students towards whom the behaviour was directed
- Whether the behaviour is a result of, or places the student at, risk of abuse or serious harm and a Mandatory Report is required to the DCJ and/or Police (Section 6.1) – including where the harmful sexual behaviour is not directed at another child or young person, or where the student exhibiting the behaviour is under the age of 10, and there is reason to suspect that the student's behaviour is a result of or places them at risk of abuse or other harm.

7. Compliance, Monitoring and Continuous Improvement

Roseville College is committed to the continuous improvement of our Child Safe Program. The College will establish child safety performance objectives, monitor implementation activities and use appropriate measures of effectiveness to evaluate and continuously improve the Child Safe Program.

The College seeks feedback from students, families, workers and the wider school community on the Child Safe Program, and will communicate any adjustments or amendments throughout the College community.

The College also analyses child safe related complaints and investigations and other child safe related concerns and incidents to inform continuous improvement of child safe related policies, procedures, systems and practice.

An annual self-assessment is completed to confirm the effectiveness of the Program and compliance with relevant laws, regulations and standards, and determine areas for improvement. The College Principal is required to provide an annual statement and other ongoing relevant reporting regarding compliance with, and the effectiveness of, this Policy and the Child Safe Program to the School Council and the TASC Board.

The College Principal is required to report on significant Child Safe related concerns or risks and any significant breaches of this Policy to the School Council and the TASC Board.

8. Breach of the Child Safety Policy

Roseville College enforces our Child Safe policy and our ChildSafeCodeofConduct. In the event of any non-compliance, we will instigate a review that may result in a range of measures including (depending on the severity of the breach):

- Remedial education
- Counselling
- Increased supervision
- The restriction of duties
- Suspension, in the case of serious breaches, termination of employment, contract or engagement
- Other action as may be required in the circumstances.

9. Roles and Responsibilities

Child safety and child protection is everyone's responsibility. All adults in the school community must understand their role in keeping students safe, comply with this Policy and related codes and procedures, report concerns promptly, and act in a way that prioritises the safety, welfare and wellbeing of students. Specific responsibilities are summarised in Table 1.

Role	Responsibilities
Workers	All workers (refer definitions) are required to: • comply with our Child Safe Policy and Child Safe Code of Conduct • complete induction in our child safety policies, practices and procedures • hold a current Working with Children Check clearance in accord with our Working with Children Check Procedure. All employees, and other workers who have *direct contact* with students, must also:

Role	Responsibilities
	• be aware of key indicators of abuse and other harm, be observant, and raise all child safety incidents and concerns with one of the College's Child Safe Officer • be familiar with our Child Safe Program and understand their legal obligations with respect to the reporting of child abuse and other harm • participate in ongoing child safe training provided by the College • seek to provide students with opportunities to express their views and consider those views when making decisions that affect them • implement inclusive practices that respond to the diverse needs of students.
College Child Safe Officer	A number of senior staff members are nominated as the College's Child Safe Officers. Our Child Safe Officers receive additional specialist training with respect to child safety and protection issues. They are a point of contact for raising child safety concerns within the College. They are also responsible for championing child safety within the College and assisting in coordinating responses to child safety incidents.
Head of Relevant Entity (HRE) and Head of a Child Safe Organisation	The Head of Relevant Entity and Head of a Child Safe Organisation (effectively, the TASC CEO and each TASC Principal) have the following specific responsibilities under the Children's Guardian Act: • Oversee and ensure the implementation of the 10 Child Safe Standards across the organisation through systems, policies and processes • Promote and lead a child safe culture • Ensure TASC and each of its schools implements a reportable conduct policy • Comply with requirements of the Head of Relevant Entity in the Children's Guardian Act 2019 (see section 6.2 of this policy)
The Principal	The Principal undertakes the responsibilities of the Head of Relevant Entity and Head of Child Safe Organisation (refer above). Additionally, the Principal is responsible, and will be accountable for the operational management of the College, and

Role	Responsibilities
	the Child Safe Program. The Principal is responsible for taking all reasonable measures to ensure that this Child Safe Policy and the College's Child Safe Program is implemented effectively and that a strong and sustainable child safe culture is maintained within the College.
The Chief Executive Officer (CEO)	The TASC CEO is considered the HRE under the Children's Guardian Act 2019 and the NSW Office of Children's Guardian Child Safe Standards. The CEO must carry out the responsibilities of the Head of Relevant Entity (see above) in any circumstances where the relevant Principal is unable to fulfil their delegated role as HRE and monitor the compliance of delegates (Principals) with their delegated HRE responsibilities. The CEO is also responsible for ensuring processes are in place to enable the TASC Board and relevant committees receive the information required to understand and oversight child safe matters, including the implementation of the child safe standards and the management of significant matters.
Chief Risk Officer	The TASC Chief Risk Officer is responsible for monitoring the TASC child safe program and supporting the CEO and Principals in fulfilling their responsibilities, including coordinating the review of child safe related policies and procedures and the annual child safe self-assessment program and quality assurance review.
College Council	The College Council is responsible for ensuring that the College has appropriate resources to effectively implement the NSW Child Safe Standards and our Child Safe Program, and to support the Principal in the practical application of the College's child safety strategies, policies, procedures and work systems. The Council receives regular reporting on Child Safe matters.
TASC Board	The TASC Board is responsible for approving the Child Safe Policy and, through the CEO, establishing appropriate oversight to assure itself of the effectiveness of the Child Safe Policy and related programs at each TASC school and the effective implementation of the Child Safe Standards.

Table 1 – Roles and Responsibilities

10. Definitions and Explanation

Term	Meaning or Explanation
Assault	(a) The intentional or reckless application of physical force without lawful justification or excuse, or (b) Any act which intentionally or recklessly causes another to apprehend immediate and unlawful violence An assault can occur when a person intentionally or recklessly (ie. knows the assault is possible but ignores the risk): • applies physical force against a child without lawful justification or excuse – such as hitting, striking, kicking, punching or dragging a child (actual physical force); or • causes a child to apprehend the immediate and unlawful use of physical force against them – such as threatening to physically harm a child through words and/or gestures regardless of whether the person actually intends to apply any force (apprehension of physical force)
Behaviour that causes significant emotional or psychological harm	Behaviour that causes significant ***emotional or psychological harm*** to a child is conduct that is intentional or reckless (without reasonable excuse), obviously or very clearly unreasonable and which results in significant emotional harm or trauma to a child. For an allegation of *reportable conduct* involving psychological harm, the following elements must be present: • An obviously or very clearly unreasonable or serious act or series of acts that the employees knew or ought to have known was unacceptable, and • Evidence of psychological harm to the child that is more than transient, including displaying patterns of 'out of character behaviour', regression in behaviour, distress, anxiety, physical symptoms or self-harm, and • An alleged causal link between the employee's conduct and the significant emotional or psychological harm to the child.
Child	**Child** is defined in the Children and Young Persons (Care and Protection) Act 1998 (NSW) as a person who is under the age of 16 years. For the mandatory reporting regime, therefore, a Child is under 16 years, and a young person is aged 16 or 17.

Term	Meaning or Explanation
	For the purpose of the Children's Guardian Act reportable conduct scheme, a Child is a person aged under 18 years.
Child Abuse	Child abuse includes neglect, sexual abuse, physical abuse, and emotional abuse that can lead to serious psychological harm.
Child Safe Officer	Person nominated by the College Principal to act as a point of contact for *workers* and students on child protection matters. Child Safe Officers need to take action when any child protection incidents are reported to them, including immediately informing College Principal and providing support to affected members of the College community. CPOs may also be required to review and monitor the effectiveness of the College's processes and procedures to respond to allegations or disclosures.
Child Related Work	Under the Act and related Regulation (and of relevance to the College), child-related work is work for, or in connection with, any of the following: • mentoring and counselling services for children • direct provision of child health services • disability services for children with a disability • clubs, associations, movements, societies or other bodies (including bodies of a cultural, recreational or sporting nature) providing programs or services for children • education and care services, child care centres, nanny services and other child care • sporting, cultural or other entertainment venues used primarily by children and entertainment services for children • justice services, such as detention centres • any religious organisation where children form part of the congregation • private coaching or tuition to children • boarding houses or other residential services for children and overnight camps for children • transport services especially for children, including College bus services and taxi services for children with a disability and supervision of School road crossings

Term	Meaning or Explanation
	• a cleaner providing cleaning services at the College is child-related work, and • a worker providing ongoing, counselling, mentoring or distance education using any form of communication that does not primarily involve direct contact (physical or face-to-face contact, where that contact is a usual part of and more than incidental to the work). An employer can also require a *worker* to have a WWCC clearance if they have access to confidential records or information about children, and as such, the Anglican Schools Corporation requires all *workers* to have a WWCC clearance.
Contractor	Any person who is not an employee of TASC but who performs services for TASC School or Group Office under a contractual arrangement, either directly with the person, or with an organisation that employs or subcontracts the person.
Direct Contact	Section 6 of the Child Protection (Working with Children) Act 2012 (NSW) defines "direct contact" as physical contact or face-to-face contact. Direct contact contractors or volunteers may have direct contact with students in circumstances where: • they may be left alone, one-on-one, with a student (for example, 1:1 tutoring or learning support), or • a reasonable person would consider that the contact may enable the individual to form a relationship of trust with a student (for example, coaching a sports team, helping with a drama production, or regularly working in a canteen or library), or • a reasonable person would consider that the contact could create a potential risk to the safety of a student (for example, responsibility for a group of students during an excursion without a member of Staff present). Examples of direct contact contractors may include: • maintenance workers who regularly work at times when students are present. For instance, electricians, plumbers, or cleaning staff who regularly carry out repairs, maintenance, or

Term	Meaning or Explanation
	cleaning during school hours, coming into contact with students in classrooms or common areas • IT technicians installing or servicing equipment during school hours: Technicians who are on-site to repair computers, projectors, or internet infrastructure while students and staff are in the building • Groundskeepers or landscapers working during school hours: Contractors tending to gardens, lawns, or playgrounds while students are outside playing or moving between areas • tutors • specialist music or drama teachers • casual teachers • sporting team coaches • outdoor education specialists • physical education service providers • a visiting health practitioner or other person engaged to provide health care services. Examples of direct contact volunteers include individuals who: • attend a school camp or excursion • assist a student during a learning activity • assist a student to complete tests or exams (e.g. as a scribe or reader) • coach, manage, or assist with the coaching or managing, of sports at a school • assist with theatre or music productions • tutor, or assist with the tutoring of, a student in extracurricular activities such as music, choir or debating • assist or volunteer in a School canteen or uniform shop.
Direct contact contractor or direct contact volunteer	Means a contractor or volunteer who, in the usual course of providing services, could potentially have "direct contact" with students.

Term	Meaning or Explanation
Domestic Violence	Domestic violence is behaviour towards a family member that may include: • physical violence or threats of violence • verbal abuse, including threats • emotional or psychological abuse • sexual abuse • financial and social abuse.
Failure to Protect Offence	Under section 43B of the Crimes Act 1900 (NSW) – Failure to reduce or remove risk of child becoming victim of child abuse – an adult working in a school (therefore all workers) will commit an offence if they know another adult working there poses a serious risk of committing a child abuse offence and they have the power to reduce or remove the risk, and they negligently fail to do so either by acts and/or omissions. This offence is targeted at those in positions of authority and responsibility working with children who turn a blind eye to a known and serious risk rather than using their power to protect children.
Failure to Report Offence	Under section 316A of the Crimes Act 1900 (NSW) – Concealing a child abuse offence – Any adult will commit an offence if they know, believe or reasonably ought to know that a child abuse offence has been committed and fail to report that information to Police, without a reasonable excuse. A reasonable excuse would include where the adult has reported the matter to the College Principal and is aware that the College Principal has reported the matter to the Police.
Governors	TASC Board Members, School Council members and other persons who sit on TASC Board Committees.
Grooming	Definitions of 'grooming', within child protection legislation, are complex. Under the Crimes Act, grooming or procuring a child under the age of 16 years for unlawful sexual activity is classed as a sexual offence. The Crimes Act (s73) also extends the age of consent to 18 years when a child is in a 'special care' relationship. Under Schedule 1(2) of the Child Protection (Working with Children) Act, grooming is recognised as a form of sexual misconduct. The Children's Guardian Act 2019 and this Child Safe Policy reflect

Term	Meaning or Explanation
	these definitions within the context of the Reportable Conduct Scheme (Division 2). In general terms, grooming refers to behaviours that manipulate and control a child or young person, their family and other support networks, or institutions, with the intent of gaining access to the child or young person for the purposes of engaging in sexually harmful behaviour, obtaining the child or young person's compliance, maintaining the child or young person's silence, and avoiding discovery of the sexual abuse. Grooming is often defined as the use of a variety of manipulative and controlling techniques with a vulnerable subject in a range of inter-personal and social settings in order to establish trust or normalise sexually harmful behaviour with the overall aim of facilitating exploitation and/or prohibiting disclosure of the harmful behaviour.
Head of Relevant Entity	Under section 17 of the Children's Guardian's Act, the Head of Relevant Entity is (of relevance to TASC), the Chief Executive Officer. Under section 66 of the Children's Guardian Act, the Head of Relevant Entity may delegate any of the functions of the Head of Relevant Entity under the Reportable Conduct scheme to another employee of the entity. The TASC CEO delegates the functions of the Head of Relevant Entity to the Principal of each TASC school with respect to their school.
Ill-treatment	Of a child, means conduct towards a child that is: • unreasonable, and • seriously inappropriate, improper, inhumane or cruel. Ill-treatment can include a range of conduct such as making excessive or degrading demands of a child; a pattern of hostile or degrading comments or behaviour towards a child; and using inappropriate forms of behaviour management towards a child.
Mandatory Reporter	Under section 27 of the Children and Young Persons (Care and Protection) Act 1998, the following persons are required to make mandatory reports: (a) A person who, in the course of his or her professional work or other paid employment delivers health care, welfare, education,

Term	Meaning or Explanation
	children's services, residential services, or law enforcement, wholly or partly, to children (b) a person who holds a management position in an organisation the duties of which include direct responsibility for, or direct supervision of, the provision of health care, welfare, education, children's services, residential services, or law enforcement, wholly or partly, to children (c) a person in religious ministry, or a person providing religion-based activities to children, and (d) a registered psychologist providing a professional service as a psychologist.
Mandatory Reporter Guide (MRG)	A structured decision-making tool provided by the DCJ to support mandatory reporters to decide whether a child is suspected to be at Risk of Significant Harm (ROSH) and a report should be made to the Child Protection Helpline on 13 21 11. *Available here*.
Neglect	Of a child, means a significant failure to provide adequate and proper food, supervision, nursing, clothing, medical aid or lodging for the child, that causes or is likely to cause harm to a child, by – (a) a person with parental responsibility for the child, or (b) an authorised carer of the child, or (c) an employee, if the child is in the employee's care. Neglect can be an ongoing situation of repeated failure by a caregiver to meet a child's physical or psychological needs, or a single significant incident where a caregiver fails to fulfil a duty or obligation, resulting in actual harm to a child where there is the potential for significant harm to a child. Examples of neglect include failing to protect a child from abuse, exposing a child to a harmful environment and failing to seek medical treatment for a child.
Physical abuse	A non-accidental injury or pattern of injuries to a child or young person caused by a parent, carer or any other person. It includes, but is not limited to, injuries which are caused by: • excessive discipline • severe beatings or shakings

Term	Meaning or Explanation
	• cigarette burns • attempted strangulation • female genital mutilation. Injuries can include bruising, lacerations or welts, burns, fractures or dislocation of joints.
Psychological Harm	Refers to a parent or caregiver's inappropriate verbal or symbolic acts towards a child and/or a pattern of failure over time to provide a child with adequate non-physical nurturing and emotional availability. The behaviour of their parent or caregiver damages the confidence and self-esteem of the child or young person, resulting in serious emotional deprivation or trauma.
Reasonable grounds to suspect	'Reasonable grounds' refers to the need to have an objective basis for suspecting that a child or young person may be at risk of significant harm, based on: • first-hand observations of the child, young person or family; • what the child, young person, parent or another person has disclosed; • what can reasonably be inferred based on professional training and / or experience. 'Reasonable grounds' does not mean a person is required to confirm their suspicions or have clear proof before making a report.
Reportable allegation	An allegation that an employee has engaged in conduct that may be reportable conduct, whether or not the conduct is alleged to have occurred in the course of the employee's employment with TASC.
Reportable conduct	The following conduct, whether or not a criminal proceeding in relation to the conduct has been commenced or concluded: (a) a *sexual offence* with examples including sexual touching of a child; a child *grooming* offence; and production, dissemination or possession of child abuse material) (b) *sexual misconduct* (c) *ill-treatment* of a child

Term	Meaning or Explanation
	(d) *neglect* of a child (e) *an assault* against a child (f) an offence under section 43B (*failure to protect* offence) or 316A (*failure to report offence*) of the Crimes Act 1900 (g) *behaviour that causes significant emotional or psychological harm* to a child, with example indicators of such harm including: o *displaying behaviour patterns that are out of character, including anxiety that impairs functioning and self-harm* o regressive behaviour. Reportable Conduct does not include: • conduct that is reasonable for the purpose of discipline, management or care of children, having regard to age, maturity, health or other characteristics of the children and any relevant codes of conduct or professional standards, or • the use of physical force that, in all the circumstances, is trivial or negligible and the circumstances in which it was used have been investigated and the result of the investigation has been recorded in accordance with appropriate procedures.
Reportable Conduct Scheme	Scheme established under Part 4 of the Children's Guardian Act to monitor how relevant entities investigate reportable allegations and make determinations in relation to reportable convictions.
Reportable Conviction	A conviction, including a finding of guilt without the court proceeding to a conviction, in NSW or elsewhere, of an offence involving reportable conduct, whether or not the conduct is alleged to have occurred in the course of the employee's employment with TASC.
Risk of Significant Harm (ROSH)	A *child* or *young person* is 'at risk of significant harm' if current concerns exist for the safety, welfare or well-being of the child or young person because of the presence, to a significant extent, of any one or more of the following circumstances: • the child's or young person's basic physical or psychological needs are not being met or are at risk of not being met

Term	Meaning or Explanation
	• the parents or other caregivers have not arranged and are unable or unwilling to arrange for the child or young person to receive necessary medical care • in the case of a child or young person who is required to attend school in accordance with the Education Act 1990, the parents or other caregivers have not arranged and are unable or unwilling to arrange for the child or young person to receive an education in accordance with that Act • the child or young person has been, or is at risk of being, *physically* or *sexually abused* or *ill-treated* • the child or young person is living in a household where there have been incidents of *domestic violence* and as a consequence, the child or young person is at risk of serious *physical* or *psychological harm* • a parent or other caregiver has behaved in such a way towards the child or young person, that the child or young person has suffered or is at risk of suffering serious *psychological harm* • the child was the subject of a pre-natal report under section 25 of the Children and Young Persons (Care and Protection Act) 1998 (NSW) and the birth mother of the child did not engage successfully with support services to eliminate, or minimise to the lowest level reasonably practical, the risk factors that gave rise to the report. What is meant by 'significant' in the phrase 'to a significant extent', is that which is sufficiently serious to warrant a response by a statutory authority irrespective of a family's consent. What is significant, is not minor or trivial and may reasonably be expected to produce a substantial and demonstrably adverse impact on the child's or young person's safety, welfare or well-being. The significance can result from a single act or omission or an accumulation of these.
Sexual abuse	Sexual abuse is when someone involves a child or young person in a sexual activity by using their power over them or taking advantage of their trust. Often children and young people are

Term	Meaning or Explanation
	bribed or threatened physically or psychologically to make them participate in the activity. Sexual abuse includes sexual activity or behaviour that is imposed, or is likely to be imposed, on a child or young person by another person
Sexual misconduct	Conduct with, towards or in the presence of a child that – (a) is sexual in nature, but (b) is not a sexual offence. The Act provides the following (non-exhaustive) examples: • descriptions of sexual acts without a legitimate reason to provide the descriptions • sexual comments, conversations or communications • comments to a child that express a desire to act in a sexual manner towards the child, or another child. Note – crossing professional boundaries comes within the scope of the scheme to the extent that the alleged conduct meets the definition of sexual misconduct. That is, the conduct with, towards or in the presence of a child that is sexual in nature (but is not a sexual offence).
Sexual offence	An offence of a sexual nature under a law of the State, another State, a Territory, or the Commonwealth, committed against, with or in the presence of a child, such as: • sexual touching of a child • a child grooming offence • production, dissemination or possession of child abuse material • voyeurism. An alleged sexual offence does not have to be the subject of criminal investigation or charges for it to be categorised as a reportable allegation of sexual offence.
Student	Any person enrolled at the College regardless of age.
Worker	Means any person who is engaged in work in any of the following capacities: (a) as an employee, (b) as a self-employed person or as a contractor or subcontractor,

Term	Meaning or Explanation
	(c) as a volunteer (including governors), (d) as a person undertaking practical training as part of an educational or vocational course (other than as a school student undertaking work experience), (e) as a minister, priest, rabbi, mufti or other like religious leader or spiritual officer of a religion or other member of a religious organisation.
Young Person	Defined in the Children and Young Persons (Care and Protection) Act 1998 (NSW) as a person who is aged 16 years or above, but who is under the age of 18 years.

Table 2 – Definitions

11. Relevant Legislation

- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- Child Protection (Working with Children) Act 2012 (NSW) and Child Protection (Working with Children) Regulation 2013
- Children's Guardian Act 2019 (NSW) and Children's Guardian Regulation 2022
- Crimes Act 1900 (NSW)
- Education Act 1990 (NSW)
- Civil Liability Act 2002 (NSW)

12. Related Policies and Procedures

- Roseville College Codes of Conduct for Employees (including professional boundaries), Parents, Visitors and Students
- Complaints Handling Program
- Reportable Conduct Policies and Procedures
- Procedures for Managing Child Safety Incidents at or involving the School
- Anti-Bullying Policy
- Working with Children's Check Procedure

- Privacy Policy
- Reporting of Significant Matters to the Board
- Risk Management Policy
- Whistleblower Policy

13. Policy Review and Administration

The Policy shall be reviewed annually or in the event of any information arising that would demonstrate the need for a review or resulting from any legislative or organisational change that would warrant a review.

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