# Child Safe Policy & Procedures

## 1. Introduction

### *1.1 Background*

Mount Sinai College caters for students from age 2 at our Early Learning Centre, up to Year 6 and strives to build a community of transformative learning with integrity embedded in modern Orthodox Jewish values.

### 1.2 *Purpose and Scope*

The safety, protection and well-being of all students is of fundamental importance to Mount Sinai College. The college demonstrates a strong commitment to child safety and provides an outline of the policies and procedures that we have developed to keep our students safe, including from abuse or other harm.

This policy sets out staff responsibilities for child protection and processes that staff must follow in relation to child protection matters. This policy applies to all staff members, including employees, contractors and volunteers. Staff members who fail to adhere to this policy may be in breach of employment, contract, or engagement conditions and may result in disciplinary action. The policy should be read in-conjunction with A Guide to the Child Safe Standards, issued by the Office of the Children's Guardian.

### 1.3 *Key Legislation*

There are five key pieces of Child Protection legislation in New South Wales (NSW):

- the *Children and Young Persons (Care and Protection)* Act 1998 (NSW) (Care and Protection Act)
- the *Child Protection (Working With Children) Act 2012* (NSW) (WWC Act)
- the *Children's Guardian Act* 2019 (Children's Guardian Act)
- Part 3A Child Safe Scheme (Children's Guardian Act)
- the *Crimes Act 1900* ("Crimes Act").

Other relevant legislation:

- the *Privacy and Personal Information Protection Act 1998*
- the *Advocate for Children and Young People Act 2014*
- the *Education Act 1990*
- the *Health Records and Information Privacy Act 2022*

## 1.4 *Child Safe Standards*

The Child Safe Scheme gives the Office of the Children's Guardian (OCG) additional powers to monitor and investigate how organisations implement the Child Safe Standards to support the safety and wellbeing of children and young people. Under the scheme, certain child-related organisations including in the Education, Early Childhood, Health and Justice sectors, must implement the Child Safe Standards.

The Office of the Children's Guardian is an independent statutory body that promotes the interests, safety and rights of children and young people in NSW. The core functions of the Office of the Children's Guardian include administering Working With Children Checks, Reportable Conduct Scheme and implementation of the Child Safe Standards. The Child Safe Standards are:

- Standard 1 – Leadership and Culture: Child safety is embedded in organisational leadership, governance and culture.
- Standard 2 – Children's Participation: Children participate in decisions affecting them and are taken seriously.
- Standard 3 - Families and Communities: Families and communities are informed and involved.
- Standard 4 – Equity and Diversity: Equity is upheld, and diverse needs are considered.
- Standard 5 – Suitability of Workers: People working with children are suitable and supported.
- Standard 6 – Complaint Handling: Processes to respond to complaints of child abuse are child-focused.
- Standard 7 – Knowledge and Skills: Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training.
- Standard 8 – Physical and Online Environments: Physical and online environments minimise the opportunity for abuse to occur.
- Standard 9 – Continuous Improvement: Implementation of the Child Safe Standards is continuously reviewed and improved.
- Standard 10 – Policies and Procedures: Policies and procedures document how the organisation is child safe.

The staff at Mount Sinai College are annually in-serviced on the Child Safe Standards, what they mean in schools and how they are specifically implemented at the College.

### 1.5 *Related Policies*

There are other Mount Sinai College policies that relate to child protection. Staff members must be aware of and understand the following (but not limited to):

- *Staff Code of Conduct* sets out information about the standards of behaviour expected of all employees
- *Complaints Handling Policy & Procedures*
- *Bullying Prevention and Intervention Policy & Procedures*

### 1.6 *Compliance and Records*

The Principal or their delegate (Deputy Principal) monitors compliance with this policy and securely maintains Mount Sinai College records relevant to this policy, which includes:

- Register of staff members who have read and acknowledged that they have read and understood the Policy
- Working with Children Check Clearance verifications – verified by Principal's PA
- A register of Working with Children Checks maintained by Payroll
- Mandatory reports to Department of Communities and Justice (DCJ)
- Reports of Reportable Conduct allegations, the outcome of Reportable Conduct investigations, and/or criminal convictions.

Records are maintained by the Principal and are stored Confidentially in their Directory on the College server and on TASS. Paper copies are stored in the Psychologist's locked filing cabinet. WWCC records and verification dates are electronically recorded in staff records on TASS.

## 2. Child Protection

The safety, protection and welfare of students is the responsibility of all staff members (full-time, part-time, casual and contractors), volunteers, teachers on practicum and encompasses:

- A duty of care to ensure that reasonable steps are taken to prevent harm to students which could reasonably have been foreseen
- Obligations under Child Protection legislation.

## 2.1 *Child Protection Concerns*

There are different forms of child abuse. These include neglect, sexual, physical and emotional abuse.

***Emotional abuse*** can result in serious psychological harm, where the behaviour of their parent or caregiver or other adult person, damages the confidence and self-esteem of the child or young person, resulting in serious emotional deprivation or trauma.

Although it is possible for 'one-off' incidents to cause serious harm, in general it is the frequency, persistence and duration of the parental or carer behaviour that is instrumental in defining the consequences for the child. This can include a range of behaviours such as excessive criticism, withholding affection, exposure to domestic violence, intimidation or threatening behaviour.

***Neglect*** is the continued failure by a parent or caregiver to provide a child with the basic things needed for his or her proper growth and development, such as food, clothing, shelter, medical and dental care and adequate supervision.

***Physical abuse*** is a non-accidental injury or pattern of injuries to a child caused by a parent, caregiver or any other person. It includes but is not limited to injuries caused by excessive discipline, severe beatings or shakings, cigarette burns, attempted strangulation and female genital mutilation. Injuries include bruising, lacerations or welts, burns, fractures or dislocation of joints. Hitting a child around the head or neck and/or using a stick, belt or other object to discipline or punish a child (in a non-trivial way) is a crime.

***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 are bribed or threatened physically and psychologically to make them participate in the activity. Child sexual abuse is a crime.

### 2.2 *Child Wellbeing Concerns*

Child wellbeing concerns are safety, welfare or wellbeing concerns for a child or young person that do not meet the mandatory reporting threshold, risk of significant harm in Section 5.1.2 of this document.

### 2.3 *Staff Member Responsibilities*

Key legislation requires reporting of child protection concerns. However, as part of the College's overall commitment to child protection, **all staff** (this includes but is not limited to teaching staff, support staff, casual staff, administration staff, and peripatetic teachers who come into contact with students are required to report any child protection or child wellbeing concerns about the safety, welfare or wellbeing of a child or young person to the: ***Principal*** or their delegate (***Deputy Principal***) or the ***School Psychologist*** who in turn will report to the ***Principal***.

If the allegation involves the Principal, a report should be made to the ***President of the Board of Management*** (president@mountsinai.nsw.edu.au).

## 3. Training

### 3.1 *Mount Sinai College*

Mount Sinai College provides all staff members with a copy of this Policy. It is mandatory for all staff who are in contact with children to attend annual training.

The annual training will consist of at least one of the following: an AIS approved online training course and/or face-to-face training with an accredited external consultant and/or in-house training by a member of the Leadership Team and/or the Online Module on the NSW Office of Children's Guardian. At the completion of this training, staff will be asked to send evidence of course completion to the Principal's Personal Assistant.

Where the College holds a whole staff Child Safety Training Course on a specified day, staff who are absent will be required to complete a follow-up training or assignment or attest that they have read and understood the requirements in the training material.

These materials will be electronically filed by the PA to the Principal in the 'All Staff Drive/child protection training' and on the Principal's PA's confidential school drive.

In Additionally, there will be an annual review of the College's Child Protection Policy and Procedures.

### 3.2 *Staff Members*

All staff must read this Policy and sign Acknowledgement that they have read, understood and agree to abide by the requirements of this policy prior to commencing working with children.

All staff must participate in annual Child Protection training and additional training, as directed by the Principal. The training complements this Policy and provides information to staff about their legal responsibilities related to Child Protection and to Mount Sinai College's expectations.

including:

- mandatory reporting
- reportable conduct
- staff and adult misconduct
- maintaining professional boundaries.

New staff who arrive after the annual training will be required to sign and acknowledge their understanding of this Policy and will be provided with in-house training as part of their induction. This will be overseen by the Principal or delegate. Staff will also be required to read *A Guide to the Child Safe Standards*, issued by the Office of the Children's Guardian.

## 4. Working with Children

The WWC Act protects children by requiring a worker to have a Working with Children's Check clearance or current application to engage in child-related work. Failure to do so may result in a fine or imprisonment. The Office of the Children's Guardian (OCG) is responsible for determining applications for a Working with Children Check Clearance (WWCC clearance). It involves a national criminal history check and review of reported workplace misconduct findings. The result is either to:

- grant a WWCC clearance (generally valid for five years)
- refuse a WWCC clearance (further applications cannot be made for five years).

In addition, the OCG may impose an interim bar on engaging in child-related work for both applicants and WWCC clearance holders. WWCC clearance holders are subject to ongoing monitoring by the OCG.

### 4.1 ***Responsibilities for Working with Children Checks***

#### 4.1.1 *Staff members*

Mount Sinai College staff who engage in child-related work and eligible volunteers (including those volunteers working at overnight camps and student-teachers) are required to:

- hold and maintain a valid WWCC clearance.
- not engage in child-related work at any time that they are subjected to an interim bar or a bar.
- report to the Principal if they are no longer eligible for a WWCC clearance, the status of their WWCC clearance changes, or they are notified by the OCG that they are subject to a risk assessment.
- notify the Children's Guardian of any change to their personal details within three months of the change occurring. Failure to do so may result in a fine.

It is an offence for an employee to engage in child-related work when they do not hold a WWCC clearance or if they are subject to a bar. All volunteers are required to be aware of and follow the expectations of conduct expressed in the Staff Code of Conduct. All new volunteers may be given a copy of this Policy & Procedures and asked to sign that they have read, understood and accepted the conditions in this document.

#### 4.1.1.1 *External Providers*

External providers are required to hold a WWCC that has been verified by Mount Sinai College. Mount Sinai College may accept that a provider holds a valid WWCC if it has been verified by an Educational institution (e.g., Distance Education or School of Languages).

### *4.1.2 Mount Sinai College*

The College:

- The Principal verifies online and records the status of each child-related worker's WWCC clearance before a staff member commences employment at Mount Sinai College.
- only employs or engages child-related workers or eligible volunteers who have a valid WWCC clearance.
- Payroll maintains records of the first and subsequent verifications of a staff member's WWCC and this is stored as a paper copy in the Staff file and on their TASS file along with the current verification date. The current expiry date is recorded on the staff member's electronic file in TASS.
- The Principal monitors the WWCC for staff prior to the commencement of each School Term. The date for renewal is put into TASS which sends an alert 3 months before renewal is due. An email is sent to any relevant staff about the need to update their WWCC. All workers at Mount Sinai College who

require a WWCC have a TASS profile where the verification of staff WWCC is stored.

- The Principal or their Delegate (Deputy Principal) reports to the OCG any findings made after completing a reportable conduct investigation, including whether there has been a finding of ***Reportable Conduct*** itself. A finding of Reportable Conduct in relation to sexual misconduct or a serious physical assault must be referred to the OCG's Working with Children Directorate (WWCC Directorate). It is an offence for an employer to knowingly engage a child-related worker when they do not hold a WWC clearance or who has a bar.

  The Principal and their PA monitor Reportable Conduct records. Reportable Conduct Investigation documents are stored in a locked cupboard in the Principal's Office. A brief file note with reference to the investigation is also placed in the staff file, in TASS and the paper Staff files in the Director of Finance and Operations' Office.

### 4.2 *Working with Children Check Clearance*

A WWCC clearance is authorisation under the WWC Act for a person to engage in child-related work.

#### 4.2.1 *Child-Related Work*

Child-related work involves direct contact by the worker with a child or children and that contact is a usual part of and more than incidental to the work. Child-related work includes, but is not limited to work in the following sectors:

- early education and childcare including education and care service, childcare centres and other childcare
- Colleges and other educational institutions and private coaching or tuition of children
- religious services
- residential services including boarding Colleges, homestays more than three weeks, residential services and overnight camps
- transport services for children including College bus services, taxi services for children with disability and supervision of College road crossings
- counselling, mentoring or distance education not involving direct contact.

Any clarification with respect to whether certain roles/duties engage in child-related work should be directed to the Principal. Parents of students currently enrolled in Mount Sinai College are not required to have WWCC clearance, except in the circumstances listed above.

### 4.2.2 *Application/Renewal*

An application or renewal can be made through Service NSW or its replacement agency. The process for applying for and renewing a WWCC clearance with the OCG involves a national police check and a review of findings of misconduct. If the OCG grants or renews a WWCC clearance, the holder will be issued with a number for a 5-year period which is to be provided to the College to verify the status of a staff member's WWCC clearance.

### 4.2.3 *Refusal / Cancellation*

The OCG can refuse to grant a WWCC clearance or cancel a WWCC clearance. The person is then restricted from engaging in child-related work and not able to apply for another clearance for five years. Employers are notified by the OCG and instructed to remove such persons from child-related work.

### 4.2.4 *Interim Bar*

The OCG may issue an interim bar for up to 12 months, to high-risk individuals to prevent them from engaging in child-related work while a risk assessment is conducted. If an interim bar remains in place for ≥six months, it may be appealed to the Administrative Decisions Tribunal. Not everyone who is subject to a risk assessment will receive an interim bar; only those representing a serious and immediate risk to children.

### 4.2.5 *Disqualified Person*

A disqualified person is a person who has been convicted, or against whom proceedings have been commenced for a disqualifying offence outlined in Schedule 2 of WWC Act. A disqualified person cannot be granted a Working with Children Check clearance and is therefore restricted from engaging in child-related work.

## 4.3 *Ongoing Monitoring*

The OCG will continue to monitor criminal records and professional conduct findings of all WWCC clearance holders through a risk assessment process.

### 4.3.1 *Risk Assessments*

A risk assessment is an evaluation of an individual's suitability for child-related work. The OCG will conduct a risk assessment on a person's suitability to work with children when a new record is received which triggers a risk assessment. This may include an offence under Schedule 1, pattern of behaviour or

offences involving violence of sexual misconduct representing a risk to children, findings of misconduct involving children.

### 4.4 *Process for Reporting to OCG*

#### 4.4.1 *Mount Sinai College*

Independent Colleges, like Mount Sinai College, are defined as a ***reporting body*** by the WWC Act. Mount Sinai College is required to notify the OCG of findings made after the completion of a reportable conduct investigation, including whether there has been a finding of reportable conduct. A finding of reportable conduct in relation to sexual misconduct, a sexual offence or a serious physical assault must, and will be, reported to the OCG's WWCC Directorate. Information must also be referred internally to the OCG's WWCC Directorate if it meets the threshold for consideration of an interim WWCC bar (Section 17 of the WWCC Act) pending a formal **risk assessment**. Mount Sinai College may also be obliged to report, amend or provide additional information to the OCG as outlined in the WWC Act and the Children's Guardian Act.

#### 4.4.2 *Finding of Misconduct Involving Children*

Mount Sinai College will report any findings of reportable conduct to the OCG. When informing an employee of a finding of reportable conduct against him/her, Mount Sinai College will also alert him/her to the consequent report to the WWCC Directorate in relation to sustained findings of sexual misconduct, a sexual offence or a serious physical assault. The WWCC Act enables a person who has a 'sustained finding' referred to the OCG to request access to the records held by Mount Sinai College in relation to the finding of misconduct involving children, once these final findings have been made. The entitlements of a person to request access to information in terms of Section 46 of the WWC Act are triggered when a finding of misconduct involving children has been made. A request for records should be made directly to the OCG.

#### 4.4.3 *Other Information*

Mount Sinai College may also be required to provide information to the OCG that is relevant to an assessment of whether a person poses a risk to the safety of children or the OCG's monitoring functions.

## 5. Mandatory Reporting

The

Care and Protection Act provides for ***Mandatory Reporting*** of children at risk of significant harm. A **child** is a person under the age of 16 years and a **young person** is aged 16 years or above but under the age of 18, for the purposes of the Care and Protection Act. Under the Care and Protection Act ***Mandatory Reporting*** applies to persons who:

- in the course of their employment deliver services to children including health care, welfare, education, children's services, and residential services
- hold a management position in an organisation, the duties of which include direct responsibility for, or direct supervision of, the provision of services including health care, welfare, education, children's services and residential services, to children, are mandatory reporters.

***All teachers and support staff*** are mandatory reporters. The College also requires all other staff, as noted in Section 2.3 of this document, to **report any concerns** about a child's/young person's welfare to the Principal or their delegate (Deputy Principal, College Psychologist).

## 5.1 *Reports to The Department of Communities and Justice (DCJ)*

A mandatory reporter must, where he/she has reasonable grounds to suspect that a child (under 16 years of age) is at risk of significant harm, report to DCJ as soon as practicable. The report must include the name, or a description, of the child and the grounds for suspecting that the child is at risk of significant harm. In addition, Mount Sinai College may choose to make a report to DCJ where there are reasonable grounds to suspect a young person (16 or 17 years of age) is at risk of significant harm and there are current concerns about the safety, welfare and wellbeing of the young person. In the Independent Schools' sector, ***a mandatory reporter will meet his/her obligation if he/she makes a report to the Principal***. This centralised reporting model ensures that a person in the College has all the information that may be relevant to the circumstances of the child at risk of significant harm - and addresses the risk of the College not being aware of individual incidences that amount to cumulative harm.

### 5.1.1 *Reasonable Grounds*

***Reasonable grounds*** refer 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 do not mean a person is required to confirm their suspicions or have clear proof before making a report.

### 5.1.2 *Significant Harm*

child is at risk of significant harm where concerns are **serious and not trivial**, and where the impact **may require intervention by a statutory authority. Additionally, where concerns exist for the** safety, welfare or wellbeing 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.
- 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 the College 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 the Education Act 1990.
- 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, consequently, 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 Care and Protection Act 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 or young person's safety, welfare or wellbeing. The significance can result from a single act or omission or an accumulation of these.

5.2

*Process for Mandatory Reporting*

### 5.2.1 *Mount Sinai College Staff Members*

Mount Sinai College Staff members must raise concerns about a child or young person who may be at risk of significant harm with the Principal as soon as practicable to assess whether the matter meets the threshold of "risk of significant harm" and the steps required to report the matter. However, if the Principal is unavailable at that time, then the matter must be reported to the Principal's delegate, or the School Psychologist.

However, if there is an immediate danger to the child or young person and the Principal or next most senior member of staff is not contactable, staff members should contact the Police and/or the Child Protection Helpline (13 21 11) directly and then advise the Principal or next most senior member of staff at the College as soon as practicable.

Staff members are not required to, and must not, undertake any investigation of the matter. Staff members are not permitted to inform the parents or caregivers that a report to the DCJ has been made. Staff members are required to deal with the matter confidentially and only disclose it to the persons referred to above or as required to comply with mandatory reporting obligations.

Staff must maintain confidentiality and only disclose information as required.

Failure to maintain confidentiality may result in disciplinary action and could expose individuals to legal liability, including defamation.

### 5.2.2 *Mount Sinai College*

In general, the Principal or their delegate (Deputy Principal, College Psychologist) will report these matters to the DCJ and, where necessary, the Police. This is supported by the DCJ in accordance with best practice principles.

At Mount Sinai College, a mandatory reporter will meet their obligations if they report to the Principal in the school.

### 5.3 *Process for Reporting Concerns About Students*

#### 5.3.1 *Mount Sinai College Staff Members*

The Care and Protection Act outlines a mandatory reporter's obligation to report to the DCJ concerns about risk of significant harm. However, to ensure centralised reporting, all staff members are required to report any concern regarding the safety, welfare and wellbeing of a student to the Principal or their delegate (Deputy Principal, College Psychologist), if he is unavailable. ***Staff members who are unsure as to whether a matter meets the threshold of 'risk of significant harm' should report their concern to the Principal regardless***. Staff members are required to deal with all reports regarding the safety, welfare or wellbeing of a student confidentially, and only disclose details to the Principal, or in their absence, their delegates (Deputy Principal, College Psychologist) senior manager.

## 6. Reportable Conduct

Section 29 of the *Children's Guardian Act* 2019 requires the Heads of Entities, including non-government schools in New South Wales, to notify the OCG of all allegations of reportable conduct and convictions involving an 'employee' and the outcomes of the College's investigation of these allegations. Under the Children's Guardian Act 2019, allegations of child abuse only fall within the reportable conduct jurisdiction if the involved individual is an employee of the relevant entity at the time when the allegation becomes known by the Head of Entity. At Mount Sinai College, the Principal, in their position as the Head of Entity must **notify the OCG** of any allegations or conviction that is reportable.

Reportable Conduct involves:

- any employee, whether or not employed in connection with work or activities that relates to children, and any individual engaged by the agency to provide services to children (e.g. contractors, volunteers, work experience participants, clergy, ministers/instructors of religion who provide pastoral or liturgical services)
- a child (a person under the age of 18 years) at the time of the alleged incident; and
- conduct that meets the definition of Reportable Conduct as defined in the Act.

The OCG:

- must keep under scrutiny the systems for preventing reportable conduct by employees of non-government schools and the handling of, or response to, reportable allegations (including allegations which are exempt from notification) or convictions
- must receive and assess notifications from non-government schools concerning Reportable Conduct or reportable convictions

- is required to oversee or monitor the conduct of investigations by non-government schools into allegations of reportable conduct or reportable convictions
- must determine whether an investigation that has been monitored has been conducted properly and whether appropriate action has been taken as a result of the investigation
- may directly investigate an allegation of reportable conduct or reportable conviction against an employee of a non-government school, or the handling of or response to such a matter (e.g. arising out of complaints by the person who is the subject of an allegation)
- may investigate the way in which a relevant entity has dealt with, or is dealing with, a report, complaint or notification, if the OCG considers it appropriate to do so.

## 6.1 *Reportable Conduct*

Under the *Children's Guardian Act 2019* ***Reportable Conduct*** is defined as:

- any sexual offence
- sexual misconduct
- an assault against a child
- ill-treatment of a child
- neglect of a child
- an offence under section 43B (failure to protect) or section 316A (failure to report) of the Crimes Act 1900; and
- behaviour that causes significant psychological or emotional harm to a child

Reportable conduct does **not** extend to:

- conduct that is reasonable for the purposes of the discipline, management or care of children, having regard to the age, maturity, health or other characteristics of the children and to any relevant codes of conduct or professional standards; or
- the use of physical force that in all 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.
- Examples include (but are not limited to):
    - Raising a voice to restore classroom order
    - Guiding or redirecting a child for safety purposes
    - Momentarily restraining a child to prevent harm

### 6.1.1 *Definitions*

The following definitions relate to reportable conduct:

***Sexual Offence:*** is an office of a sexual nature under a law of NSW or another state/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.

These offences include (but are not limited to) the following:

- indecent assault
- sexual assault
- aggravated sexual assault
- sexual intercourse and attempted sexual intercourse
- possession/ dissemination/ production of child pornography or child abuse material
- using children to produce pornography
- grooming or procuring children under the age of 16 years for unlawful sexual activity
- deemed non-consensual sexual activity on the basis of special care relationships
- sexual touching of a child
- production, dissemination or possession of child abuse material.

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 Protection Policy reflect these definitions within the context of the Reportable Conduct Scheme (Division 2). 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.

***Grooming:*** refers to patterns of behaviour or conduct aimed at engaging with an alleged victim for sexual activity. Types of grooming behaviours may include:

- persuading a child or children that there is a ***special relationship***
- inappropriate gift-giving
- special favours/breaking rules
- spending inappropriate amounts of time with a child
- secret relationship, tactics to keep relationship secret

- testing boundaries (touching, physical contact, undressing in front of child, talking about sex)
- extending relationship outside of work
- establishing connections (friend-request) via social media
- personal communication about personal or intimate feelings

***Sexual misconduct:*** The Act defines sexual misconduct to mean any conduct with, towards, or in the presence of a child that is sexual in nature (but is not a sexual offence) and 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, conduct with, towards or in the presence of a child that is sexual in nature (but is not a sexual offence).

The College's *Staff Code of Conduct* outlines the nature of the professional boundaries which should exist between employees and children/young people. Employees who either intentionally breach such codes or have demonstrated an inability to apply them appropriately may face disciplinary action.

***Sexually explicit comments and other overtly sexual behaviour:*** Behaviour involving sexually explicit comments and other overtly sexual behaviour, which can constitute sexual misconduct. Some forms of this behaviour also involve crossing professional boundaries.

This conduct may include:

- inappropriate conversations of a sexual nature
- comments that express a desire to act in a sexual manner
- unwarranted and inappropriate touching
- sexual exhibitionism
- personal correspondence (including electronic communications such as emails and text messages) with a child or young person in relation to the adult's sexual feelings for a child or young person
- exposure of children and young people to sexual behaviour of others including display of pornography

- watching children undress. For example, in change rooms or toilets when supervision is not required or justified.

***Physical assault:*** is any act by which a person intentionally inflicts unjustified use of physical force (e.g. hitting, striking, kicking, punching or dragging) against another. An assault can also occur if a person causes another person to reasonably apprehend that unjustified force is going to be used against them. Even if a person who inflicts physical harm or causes another person to reasonably apprehend physical harm does not actually intend to inflict the harm or cause fear, they may still have committed an assault if they acted ***recklessly***.

'Recklessness' in this context relates to circumstances when the person ought to have known that their actions would cause a person physical harm or cause them to fear injury.

***Ill-treatment:*** captures those circumstances where a person treats a child in an unreasonable and seriously inappropriate, improper, inhumane or cruel manner. The focus is on the alleged conduct rather than the actual effect of the conduct on the child. Ill-treatment can include disciplining or correcting a child in an obviously unreasonable and seriously inappropriate manner; making excessive and/or degrading demands on a child; hostile use of force towards a child; and/or pattern of hostile or unreasonable and seriously inappropriate, degrading comments or behaviour towards a child.

***Neglect:*** includes either an action or inaction by a person who has care and/or responsibility towards a child. The nature of the employee's responsibilities provides the context against which the conduct needs to be assessed.

***Supervisory neglect:***

- An intentional or reckless failure to adequately supervise a child that results in the death of, or significant harm to, a child, or
- An intentional or reckless failure to adequately supervise a child or a significantly careless act or failure to act, that:
  - Involves a gross breach of professional standards
  - Has the potential to result in the death or significant harm to a child.

***Carer neglect:***

- Grossly inadequate care that involves depriving a child of the basic necessities of life such as the provision of food and drink, clothing, critical medical care or treatment, or shelter.

***Failure to protect from abuse:***

- an obviously or very clearly unreasonable failure to respond to information strongly indicating actual or potential serious abuse of a child.

***Reckless act (or failure to act):***

- A reckless act, or failure to act, that:
  - Involves a gross breach of professional standards
  - Has the potential to result in the death of, or significant harm to, a child

***Emotional/Psychological Harm:*** is caused by behaviour that is obviously or very clearly intentional, or reckless (without reasonable excuse) and results in significant harm or trauma to a child. There needs to be a proven causal link between the inappropriate behaviour and the harm, and the harm must be more than transient. For a reportable allegation involving psychological harm, the following elements must be present:

- an obviously or very clearly unreasonable or serious act or series of acts that the employee knew or ought to have known was unacceptable.
- evidence of psychological harm to the child that is more transient, including displaying patterns of out of character behaviour, distress, anxiety, physical symptoms of self-harm; and
- an alleged causal link between the employee's conduct and the significant emotional or psychological harm to the child.

***Reportable allegation:*** an allegation that an employee has engaged in conduct that may be reportable conduct.

***Reportable conviction:*** means a conviction (including a finding of guilt without the court proceeding to a conviction), in NSW or elsewhere, of an offence involving reportable conduct. The alleged conduct must have been committed against, with or in the presence of a child.

***ESOA:*** Employee Subject Of the Allegation.

***Child:*** is a person under the age of 18 years for the purposes of the Children's Guardian Act.

***Employee:***

- an individual employed by, or in, Mount Sinai College
- a volunteer providing services to children
- a contractor engaged directly by Mount Sinai College (or by a third party) where the contractor holds, or is required to, a WWCC clearance for the purposes of their work with Mount Sinai College; and

- a person engaged by an external religious body/organisation, where that person holds, or is required to hold, a WWCC clearance for the purposes of their work with the religious body or at Mount Sinai College.

***Note***: It should be noted that (at Mount Sinai College) the taking of photos/videos of students whilst on-site is prohibited unless prior approval has been given by the Principal or their delegate (Deputy Principal). Staff are permitted to take photos or videos of students but are not permitted to share photos, except in line with permission provided by parents, usually on TASS.

All photos of students should be uploaded to the College OneDrive. Once uploaded all photos must be deleted from individual devices.

Mount Sinai College staff are not permitted to 'friend/follow' students on Social Media unless the students are family members.

## 6.2 *Process for Reporting of Reportable Conduct Allegations or Convictions*

### 6.2.1 *Staff Members*

Any concerns about any other employee engaging in conduct that is considered inappropriate, or Reportable Conduct; or Staff Misconduct; or any allegation of inappropriate, or Reportable Conduct made to them or about the employee themselves must be reported to the ***Principal*** or their delegate (Deputy Principal). Where it is uncertain if the conduct is ***Reportable Conduct*** but is considered inappropriate behaviour, this must also be reported. If the behaviour does not meet the definition of Reportable Conduct, the allegations will be investigated according to the College's *Internal Investigation Procedures for Staff and Adult Misconduct*. These procedures are explained in this document (see clause 6.5). They are also explained in the College's ***Complaints Handling Policy & Procedures*** (which can be found on the College's website).

The Principal must notify the OCG within 7 business days of becoming aware of a reportable allegation.

**Where findings involve sexual misconduct, a sexual offence, or serious physical assault, the matter must be referred to the WWCC Directorate.**

Staff members must also report to the ***Principal*** or their delegate (Deputy Principal) when they become aware that an employee 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 employee themselves. If the allegation involves the Principal, the staff member must report the matter to the ***President of the College Board***.

### 6.2.2 *Parents, Carers and Community Members*

Parents, carers and community members are encouraged to report any conduct that is in their view inappropriate, reportable, staff misconduct (see 6.5 definition below) or criminal conduct to the Principal or their delegate (Deputy Principal), by email, in person or via a telephone call. The College may require a complaint to be put in writing and will acknowledge receipt of the same within 48 hours.

All such complaints will be dealt with in accordance with the College's *Complaints Handling procedures* (see the College's Website for the published *Complaints Handling Policy & Procedures* which deals with issues relating to students' academic and/or social progress; classroom matters and concerns; fees issues or ethos concerns.) Where there are concerns or allegations of improper staff conduct (i.e. Staff Misconduct) see 6.5 below of this document.

### 6.2.3 *The College*

The Principal, as the Head of Entity under the *Children's Guardian Act 2019*, must:

- Ensure specified systems within Mount Sinai College are in place for preventing, detecting and responding to reportable allegations or convictions
- submit a 7-day notification form to the OCG within 7 business days of becoming aware of a reportable allegation or conviction against an employee of Mount Sinai College (unless the Principal has a reasonable excuse). The notification should include the following information:
  - that a report has been received in relation to an employee of the College
  - the name of the employee
  - the name and contact details of the College and the Principal (as Head of Entity)
  - for a reportable allegation, whether it has been reported to the Police
  - whether a report has been made to the Child Protection Helpline, and
  - the nature of Mount Sinai College's initial risk assessment and risk management action.

The notice must also include the following, if known to the Principal:

- details of the reportable allegation or conviction considered to be a reportable conviction
- the date of birth and WWCC number, if any, of the employee who is the subject of the report
- the Police Report reference number (if the matter was reported to the Police)
- the report reference number if the matter was reported to the Child Protection Helpline, and

- the names of other relevant entities that employ or engage the employee, whether or not directly, to provide a service to children, including as a volunteer or contractor

There is a maximum penalty for failure to notify within 7 business days: 10 penalty units.

## 6.3 Process for Investigating an Allegation of Reportable Conduct

The Principal ensures that the following steps are taken to investigate an allegation of Reportable Conduct. The investigation process will follow procedural fairness and confidentiality principles.

**No staff member is permitted to communicate with the media regarding allegations.**

### 6.3.1 *Initial Steps*

Once an allegation of Reportable Conduct against an employee is received, the Principal is required to:

- determine on face value whether it is an allegation of Reportable Conduct.
- assess whether the DCJ or the police need to be notified (i.e. if there are reasonable grounds to suspect that a child is at risk of significant harm or a potential criminal offence). If they have been notified, seek clearance from these statutory agencies prior to the College proceeding with the Reportable Conduct investigation.
- notify the child's parents (unless doing so would likely compromise the investigation or any investigation by the DCJ or Police).
- notify the OCG within 7-business days of receiving the allegation
- carry out a Risk Assessment and take action to reduce/remove risk, where appropriate.
- provide an initial letter to the ESOA advising that an allegation of Reportable Conduct has been made against him/her and the College's responsibility to investigate this matter under Section 34 of Children's Guardian Act 2019; and
- investigate the allegation or appoint someone to investigate the allegation.

### 6.3.2 *Investigation Principles*

During the investigation of a Reportable Conduct allegation the College will:

- follow the principles of procedural fairness
- inform the ESOA of the substance of any allegations made against him/her, at the appropriate time in the investigation, and provide him/her with a reasonable opportunity to respond to the allegations

- make reasonable enquiries or investigations before making a decision
- avoid conflicts of interest
- conduct the investigation without unjustifiable delay
- handle the matter as confidentially as possible, and
- provide appropriate support for all parties including the child/children, witnesses and the ESOA.

### 6.3.3 *Investigation Steps: The Process*

In an investigation, the Principal or appointed investigator will:

- formally interview the person making the allegation.
- interview relevant witnesses and gather relevant documentation.
- provide a letter of allegation to the ESOA.
- provide the ESOA with the opportunity to provide a response to the allegations either in writing or at an interview.
- consider relevant evidence and make a **preliminary finding** in accordance with the OCG guidelines.
- inform the ESOA in writing, of the preliminary finding, by the College Principal and provide the ESOA with a further opportunity to respond or make a further submission prior to the matter moving to **Final findings**.
- consider any response provided by the ESOA.
- make a **final finding** in accordance with the OCG guidelines.
- decide on the disciplinary action, if any, to be taken against the PSOA.
- send the final report to the OCG within 30 days of having received the allegation (if it is completed) as per section 36 of the Children's Guardian Act 2019.
- should the final report be unfinished within 30 days, the College Principal must provide, at minimum, an **interim report** to the OCG within 30 days of having received the allegation, as per section 38 of the Children's Guardian Act 2019.
- Submission of an **interim report** must include:
  - a reason for not providing the final report within 30 days and an estimated time frame for the completion of the report
  - specific information, including (if known) the facts and circumstances of the reportable allegation; and any known information about a reportable conviction; action taken since the OCG received a notification about the reportable allegation or reportable conviction; including if the Principal proposes to take no further action; the reasons for any action taken and the action proposed to be taken or the reasons for the decision not to take any further action; other information prescribed by the regulations; and

- be accompanied by copies of documents in the College's possession, including transcripts of interviews and copies of any evidence.
-

The steps outlined above may need to be varied on occasion to meet circumstances. For example, it may be necessary to take different steps where the matter is also being investigated by the DCJ or the Police.

An ESOA may have an appropriate support person with him/her during the interview process. Such a person is there for support only and as a witness to the proceedings and not as an advocate or to take an active role.

## 6.4 Risk Management Through an Investigation of a Reportable Conduct Allegation

Risk management means identifying the potential for an incident or accident to occur and taking steps to reduce the likelihood or severity of its occurrence. The **Principal** is responsible for risk management throughout the investigation and will assess risk at the beginning of the investigation, during and at the end of the investigation.

All reportable conduct matters must be handled confidentially. Records will be securely stored and accessed only by authorised personnel.

**Unauthorised disclosure of information may result in disciplinary action.**

### 6.4.1 *Initial Risk Assessment*

Following an allegation of reportable conduct against an employee, the Principal or delegate (Deputy Principal) will conduct an initial risk assessment to identify and minimise the risks to:

- the child/children who are the subject of the allegation
- other children with whom the employee may have contact
- the ESOA
- the College itself
- the proper investigation of the allegation.

The factors which will be considered during the risk assessment include:

- the nature and seriousness of the allegations
- the vulnerability of the child/children the ESOA has contact with at work
- the nature of the position occupied by the ESOA
- the level of supervision of the ESOA
- the disciplinary history or safety of the ESOA and possible risks to the investigation.

The Principal or their delegate (Deputy Principal) will take appropriate action to minimise risks. This may include the ESOA being temporarily relieved of some duties; being required not to have contact with certain students; being asked to take paid leave; or being suspended from duty. When taking action to address any identified risks, the college may take into consideration both the needs of the child/ren and the ESOA. A decision to take action based on a risk assessment is not indicative of the findings of the matter. Until the investigation is complete and a finding is made, any action, such as an employee being suspended, is not to be considered to be an indication that the alleged conduct by the employee did occur.

### 6.4.2 *Ongoing Risk Assessment*

The Principal or delegate (Deputy Principal) will continually monitor risk during the investigation including in the light of any new relevant information that emerges.

### 6.4.3 *Findings*

At the completion of the investigation, a finding will be made in relation to the allegation and a decision made by the Principal or their delegate (Deputy Principal) regarding what action, if any, is required in relation to the ESOA, the child/children involved and any other parties.

### 6.4.4 *Information for the ESOA*

The ESOA will be advised:

- that an allegation has been made against him/her (at the appropriate time in the investigation) and
- of the substance of the allegation, or of any preliminary finding and the final finding.

The ESOA does not automatically have the right to:

- know or have confirmed the identity of the person who made the allegation; or
- be shown the content of the OCG notification form or other investigation material that reveals information provided by other employees or witnesses.

The WWC Act enables a person who has a finding referred to the OCG to request access to the records held by the College in relation to the finding of misconduct involving children, once final findings are made. The entitlements of a person to request access to information in terms of section 46 of the WWC Act is enlivened when a finding of misconduct involving children has been made.

### 6.4.5 *Disciplinary Action*

As a result of the allegations, investigation or final findings, the College may take disciplinary action against the ESOA (including termination of employment). In relation to any disciplinary action the College will give the ESOA:

- details of the proposed disciplinary action, and
- a reasonable opportunity to respond before a final decision is made.

### 6.4.6 *Confidentiality*

It is important when dealing with allegations of reportable conduct that the matter be dealt with as confidentially as possible. The College requires that all parties maintain confidentiality during the investigation including in relation to the handling and storing of documents and records.

Records about allegations of Reportable Conduct against employees will be kept in the Principal's office in a locked file and will be accessible by the Principal or their delegate (Deputy Principal) with the Principal's express authority. No employee may comment to the media about an allegation of reportable conduct unless expressly authorised by the Principal to do so. Staff members who become aware of a breach of confidentiality in relation to a Reportable Conduct allegation must advise the Principal.

## 6.5 Staff or Adult Misconduct

### 6.5.1 *Definition of Misconduct*

*Behaviour, conduct or actions committed by staff or adults working in the College that falls outside the Mandatory Reporting Guidelines, or the Reportable Conduct Guidelines but is nevertheless deemed to have been unprofessional or inappropriate in nature and to have had a negative impact on students.*

Allegations of staff or adult misconduct need to be raised with the Principal or their delegate (Deputy Principal) via email, phone call or in person. The College may require the allegation to be put in writing and will acknowledge receipt of the same within 48 hours. The Principal or their delegate (Deputy Principal) will then conduct an internal investigation into any allegations of staff or adult misconduct.

In matters relating to the Early Learning Centre, irrespective of whether there is or there is not substantiated misconduct, as determined by the internal investigation, any parental complaint about any kind of inappropriate mishandling of children will need to be reported by the College, as the approved provider, to the NSW Department of Education (through the NQAITS portal) as a matter of course.

### 6.5.2 *Internal Investigation Procedure*

(a) If there is an allegation of misconduct, against an employee, volunteer or any other adult at the College, the Principal or their delegate (Deputy Principal) will advise such person of the allegation(s) against him/her and the likely process and timeframe of the investigation that will be conducted.

(b) The person who is making the allegation will be interviewed by the Principal and one other senior staff member. Comprehensive notes will be taken during the interview. The Principal may engage an external investigator as appropriate. At the end of the interview, the file note of the meeting will be read back to the interviewee for him/her to correct or amend any details pertaining to the allegations.

(c) Any, and all, witnesses will be interviewed by the Principal/their delegate (Deputy Principal). Again, detailed records of all interviews will be made and retained.

(d) Any and all other evidence will be collected (e.g. CCTV footage, IT records, security records, photographs, etc) from the College facilities or from witnesses.

(e) The person against whom an allegation has been made will be interviewed by the Principal or delegate (Deputy Principal).

(f) A follow-up discussion will be held with the person making the allegation/s in order to provide feedback regarding the investigation. During this discussion, it may be important to further clarify the allegations in order that any additional responses, clarifications, etc can be made.

(g) Once all interviews have been concluded, the Principal or their delegate (Deputy Principal) will analyse all the information collected and deliberate the matters in order to ascertain whether or not the allegations can be substantiated or not.

(h) Thereafter, the Principal or their delegate (Deputy Principal), will determine what specific consequences or actions should be taken, including but not limited to:

i. consulting with, reporting the matter to, or the investigation of the incident by an external agency
ii. seeking legal advice where necessary
iii. notifying the College's insurer, should the investigation reveal inappropriate behaviour by a staff member or volunteer that could result in legal action
iv. relevant file notes, letters, cautions, warnings that need to be made
v. suspension or dismissal of the relevant employee, if warranted

vi. relevant counselling for the employee against whom an allegation has been made, and/or the person making the allegation, and/or the alleged victim

vii. any other relevant action.

The employee against whom the allegation was made will be advised verbally and/or in writing about the outcome of the investigation and any determined outcomes. The person making the complaint will also be advised in writing about the substantiation or otherwise of their allegation.

(i) At the conclusion of the investigation, all records of the investigation will be stored in the Principal's office and a reference of the investigation will be placed in the staff file.

## 7. Criminal Offences

In 2018, the Crimes Act was amended to adopt recommendations of the *Royal Commission into Institutional Responses to Child Sexual Abuse*. The new offences are designed to prevent child abuse and to bring abuse that has already occurred to the attention of the Police.

### 7.1 Failure to Protect Offence (Crimes Act 1900 – NSW)

Any adult working in an educational institution (therefore all staff members of the College) will be committing an offence if he/she has knowledge of another adult working at that institution who poses a serious risk of committing a child abuse offence - and he/she has the power to reduce or remove that risk, and he/she negligently fails to do so by act and/or omission. This offence is targeted at those in positions of authority and responsibility who work with children and turn a blind eye to a known and serious risk rather than using their authority or power to protect children.

### 7.2 Failure to Report Offence (Crimes Act 1900 – NSW)

Any adult (therefore all staff members at Mount Sinai College) who knows, or believes or ought to know, that a child abuse offence has been committed – and fails to report that information to the Police (without reasonable excuse) will be committing an offence. A ***reasonable excuse*** would include: a situation where the adult has reported the matter to the Principal and is aware that the Principal has already reported the matter on to the Police.

### 7.3 Special Care Relationships (*Crimes Act 1900* – NSW)

It is a crime in NSW for a staff member, volunteer or contractor to have a sexual relationship with a student where there is a special care relationship. The Act provides that a young person is under an adult's special care if the adult is a member of the teaching staff of the College at which the young person is a student; or has an established personal relationship with the young person in connection with the provision of religious, sporting, musical or other instruction. The Special Care (sexual intercourse) offence under s73 was supplemented by an additional special care offence involving sexual touching now under s73A of the Crimes Act. The new offence under s73A will expand special care offences to also apply to non-penetrative sexual touching. The offence will protect children aged 16-17 years from inappropriate sexual contact with teachers and others who have special care of a child.

## 8. Supporting Children and Young People

Students should not be interviewed at the College unless special circumstances exist, in which case, the College will facilitate same. Special circumstances include:

- if a student is in possession of a prohibited weapon, knife, firearm or illegal substance, or as a result of any criminal activity relating to the College
- if a student is suspected of being in possession of a prohibited weapon or illegal substance and Police are required to search the student
- ***when the matter being investigated concerns allegations involving family members and it would be inappropriate to conduct the interview at the student's home***
- ***when the matter being investigated is of an urgent nature and the immediate safety and wellbeing of the student or some other person will be at risk if the interview does not take place at the College.***

In these special circumstances, the Principal should ensure:

- DCJ/Police provide the Principal with the reason why the interview must be conducted at the College
- Parents or carers should be notified and requested to attend the College prior to the interview taking place unless there is an exceptional reason as to why they should not be informed. If the allegations involve a family member, and the Principal is satisfied that parent/carer contact is inappropriate, the interview should proceed. If the Principal and Police/DCJ do not agree, the Principal should seek further advice from the AISNSW.

- It is best practice for the Principal to offer a staff member as a support person to sit with the student whilst being interviewed. This may include a staff member with whom the student is familiar (e.g. School Psychologist, etc.) Ultimately, the decision to have a support person rests with the student (age, maturity, development level dependant), and in many circumstances older students may prefer not to have a support person.
- When a student is interviewed at the College without the knowledge of parents or carers, it is the responsibility of the Police/DCJ to communicate with the parent or carer that the interview has taken place as soon as possible following conclusion of the interview. It is best practice for the Principal to confirm with Police/DCJ that this will occur and when. Any person making an enquiry or complaint concerning an interview with a student should be referred to the relevant staff from the Police/DCJ.

  If the parents or carers are contacted and refuse permission for the student to be interviewed, or the student refuses to be interviewed, the Principal must not allow the interview to take place at the College.

## 9. Policy Access

This policy can be found on the College's website, under 'Policies' and for staff, on the College's internal network drive.

## References

NSW Department of Communities and Justice (DCJ): https://www.dcj.nsw.gov.au

The Office of the Children's Guardian: www.kidsguardian.nsw.gov.au

Department of Premier and Cabinet: www.keepthemsafe.nsw.gov.au

## Review

This Policy and Procedures document may be reviewed annually and after any disclosure or suspicion of harm being actioned. The review will include checks to ensure the strategy reflects current legislation, continues to be effective, or whether any changes and additional training are required. The review will be conducted by College Senior Leadership.

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|---|---|
| **Policy & Procedure** | **Mount Sinai College Child Safe P&P** |
| **Owner** | Garron Forman |
| **Date of Implementation** | 22-8-24 |
| **Changes** | 26-5-26 |
| **Date for Review** | 26-5-27 |

## ACKNOWLEDGEMENT

I *[Print name]* _____ have read, understood and agree to comply with the terms of this Child Protection Policy.

I also acknowledge that this policy needs to be considered in relation to the policies listed in 1.5 of these documents.

I understand that I can access this policy on the College's website, under 'Policies'.

_____ _____

Signed Dated

*Return to Principal/Deputy Principal*