Oxley Christian College

Child Safety and Wellbeing Policy

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This policy is the Child Safety and Wellbeing Policy for Life Ministry Centre Ltd (LMC Ltd) operating Oxley Christian College (the College). This policy aligns with the title referenced in the Child Safe Standards and Ministerial Order No. 1359, and sits under the mission of Christian ministry and Christian ethics of Life Ministry Centre Ltd (**LMC Ltd**).

1. Purpose

Oxley Christian College is a Christian college that conducts the entirety of its affairs in accordance with the values set out in the Oxley policy “Our Christian Values”, as well as the Statement of Faith of LMC.

The Oxley Christian College Child Safety and Wellbeing Policy demonstrates the College’s commitment to creating and maintaining a child safe and child-friendly organisation, where children and young people are safe and feel safe.

This policy provides an overview of the College’s approach to the Victorian Child Safe Standards and implementing Ministerial Order No. 1359 which sets out how the Victorian Child Safe Standards apply in school environments.

It informs the College community of everyone's obligations to act safely and appropriately towards children and guides processes and practices for the safety and wellbeing of students across all areas of work, which comprise the College's **Child Safe Program**.

The Child Safety and Wellbeing Policy provides the framework for:

- the implementation of the Victorian Child Safe Standards, Ministerial Order No. 1359 and the National Principles;
- the development of work systems, practices, policies and procedures, consistent with the PROTECT *4 Critical Actions to identify and respond to child abuse*, and for promoting child protection, safety and wellbeing within the College.
- the creation of a safe and supportive College environment and a positive and robust child safe culture;
- the promotion and open discussion of child safety issues within the College; and
- compliance with all laws, regulations and standards relevant to child safety and wellbeing, including child protection, in Victoria.

2. Scope

This policy:

- applies to all College staff, volunteers, and contractors whether or not they work in direct contact with students. It also applies to College Council members where indicated;
- applies in all physical, virtual and online College environments used by students during or outside of school hours, including all locations provided for a student's use, (for example on-site and off-site College grounds, sporting events, camps and excursions and environments provided by third-party providers and other contractors);
- should be read together with the other child safety and wellbeing policies, procedures, and codes;
- is an overarching document that provides key elements of the College approach to protecting children from abuse;
- forms the foundation of the College's procedures, practices, decision-making processes, and ultimately, the College's culture with respect to child safety;
- is designed to be published on Oxley's public website, as well as being communicated through other mediums, such as induction and welcome packs for College Council Members, staff and volunteers; and
- has been approved and endorsed by the College Council and is regularly reviewed by the College Executive and Council.

3. Definitions

The following terms in this policy have specific definitions.

a. **biological sex** or **sex** means the immutable biological identity of each person of either being male or female, which is determined by a person's chromosomes (XX for female and XY for male) and reproductive function, and is identified at birth by a person's anatomy and is normatively expressed in secondary sex characteristics, except in a small percentage of people (<0.02% of the population) born with physical and / or genetic differences / disorders of sexual development.

b. **child** means a child or young person who is under the age of 18 years.

c. **child abuse** includes:

   i. any act committed against a child involving:

      - a sexual offence; and

- grooming offences under section 49M(1) of the Crimes Act 1958.

ii. the infliction on a child, of:

- physical violence; or
- serious emotional or psychological harm; and

iii. the serious neglect of a child.

d. **child-connected work** means work authorised by a school governing authority and performed by an adult in a school environment while children are present or reasonably expected to be present.

e. **child-related work** means work which usually involves (or is likely to involve) direct contact with a child, irrespective of whether that contact is supervised or not, and in any of the child-related occupational fields listed in the Worker Screening Act 2020. Direct contact includes oral, written, or electronic communication, as well as face-to-face and physical contact that may be paid or unpaid (voluntary).

f. **child safety** includes:

- matters related to protecting all children from child abuse;
- managing the risk of child abuse;
- providing support to a child at risk of child abuse; and
- responding to suspicions, incidents, disclosures or allegations of child abuse.

g. **contractor** includes a person or firm that undertakes a contract to provide materials or labour to perform a service for the College.

h. **gender dysphoria** is a psychological condition of distress where a person experiences persistent distress regarding their biological sex and / or associated physical characteristics, whether or not clinically diagnosed. It should not be confused with the occasional gender experimentation or gender questioning experienced by some children and adolescents during their maturation and development.

i. **gender confusion** is a psychological condition where a person considers that their biological sex and / or associated physical characteristics do not align with their psychological construct of gender identity, which is often called gender incongruence, and includes the condition of gender dysphoria.

j. **gender identity** is a theoretical concept that involves a person's subjective conception of self-identity that is manifested in self-description, appearance, behaviour and mannerisms that may or may not correspond to the person's biological sex, or to societal sex-based norms, expectations and stereotypes.

k. **gender-neutral approach** is the approach of providing equal and identical treatment of persons without regard to their gender identity.

l. **gender transition** is the practice of social, hormonal, or surgical alteration of a person's external presentation to present in accordance with an adopted gender identity that is contrary to a person's biological sex, or contrary to societal sex-based norms, expectations or stereotypes.

m. **Governing Standards** means the College's Statement of Faith, Vision and Mission Statements, "Our Christian Values" Policy, and School Aims.

n. **school environment** means any of the following physical, online, or virtual places, used during or outside school hours:

i. a campus of the College;

ii. online or virtual school environments made available or authorised by the school governing authority for use by a child or student (including email, intranet systems, software applications, collaboration tools, and online services); or

iii. other locations provided by the College, or through a third-party provider, for a child or student to use, including, but not limited to, locations used for:

- camps;
- approved homestay accommodation;
- delivery of education and training, such as registered training organisations, TAFEs, non-school senior secondary providers, or another school; or
- sporting events, excursions, competitions, or other events.

o. **school governing authority** means Life Ministry Centre Ltd.

p. **school staff** means an individual working in a school environment who is:

i. directly engaged or employed by a school governing authority;

ii. a contracted service provider (whether or not a body corporate or any other person is an intermediary) engaged by the school governing authority to perform child-related work; or

iii. a minister of religion, a religious leader or an employee or officer of a religious body associated with the College.

q. **sex-based approach** is the approach of providing equal but differentiated treatment of persons on the basis of the biological sex of those persons.

r. **sexual attraction** means a person's sexual desire or attraction towards one or both sexes and is either heterosexual (opposite sex attraction), homosexual (same-sex attraction), or bisexual (attraction to both sexes).

s. **sexual orientation** means a person's subjective conception of sexual identity based on their sexual attraction. Sexual orientation is a description of a person's attraction. It is not an ontological or teleological category.

t. **student** means a person who is enrolled at and attends the school.

u. **visitor** includes any person who is not a staff member or student at the College.

v. **volunteer** means a person who performs work without remuneration or reward for the College or in the College environment.

w. **vulnerable students** may include:

- students from culturally and linguistically diverse backgrounds;
- international students;
- students with disabilities;
- students unable to live at home;
- students who identify as same-sex attracted or with a non-heterosexual sexual orientation;
- students who experience gender confusion;
- aboriginal or Torres Strait Island students; and
- other students experiencing risk or vulnerability.

4. Statement of commitment to child safety

Oxley Christian College is a child safe organisation that welcomes children, young people, and their families who seek a Christian education as outlined in its Governing Standards, policies and statement of mission.

The College is committed to providing environments where students are safe and feel safe, where their participation is valued, their views respected, and their voices are heard about decisions that affect their lives. College child safe policies, strategies and practices are inclusive of the needs of all children and students enrolled at the College.

The College has no tolerance for child abuse and takes proactive steps to identify and manage any risks of harm to students in College environments.

The College promotes positive relationships between students and adults and between students and their peers. These relationships are based on the Christian ethics of trust and respect, among others, and on the College values of truth, goodness and beauty.

The College takes proactive steps to identify and manage any risk of harm to students in the College environment. When child safety concerns are raised or identified, they are treated seriously and responded to promptly and thoroughly.

Particular attention is given to the child safety needs of vulnerable students. Inappropriate or harmful behaviour targeting vulnerable students is not tolerated at the College, and any instances identified will be addressed with appropriate consequences. Child safety is a shared responsibility. Every person involved in the College has a role in promoting child safety and wellbeing and promptly raising any issues or concerns about a child's safety.

The College is committed to regularly reviewing its child safe practices, and seeking appropriate input from students, families, staff, and volunteers to inform ongoing strategies.

4.1 The Victorian Child Safe Standards

The Victorian Child Safe Standards were originally developed in 2016 in response to the Victorian Parliament's Inquiry into the Handling of Child Abuse by Religious and Other Organisations. They were replaced by a set of new Standards in 2022, to reflect the National Principles and to support greater national consistency.

There are 11 Victorian Child Safe Standards listed, as follows.

a. Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued.
b. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
c. Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.
d. Families and communities are informed and involved in promoting child safety and wellbeing.
e. Equity is upheld and diverse needs respected in policy and practice.
f. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
g. Processes for complaints and concerns are child focused.
h. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
i. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
j. Implementation of the Child Safe Standards is regularly reviewed and improved.
k. Policies and procedures document how the organisation is safe for children and young people.

4.2 The National Principles for Child Safe Organisations

The National Principles were developed in 2017-18 by the Australian Human Rights Commission in response to recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse. The National Principles are comprised of 10 Principles that were informed by, but go further than, the 10 Child Safe Standards recommended by the Royal Commission.

They are:

a. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
b. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
c. Families and communities are informed and involved in promoting child safety and wellbeing.
d. Equity is upheld and diverse needs respected in policy and practice.
e. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
f. Processes to respond to complaints and concerns are child focused.
g. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
h. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
i. Implementation of the national child safe principles is regularly reviewed and improved.
j. Policies and procedures document how the organisation is safe for children and young people.

5. Roles and responsibilities

5.1 College leadership team

The College Executive team (comprising the Principal, Deputy Principal, Heads of Schools and Business Manager) is responsible for ensuring that a strong child safe culture is created and maintained, and that policies and practices are effectively developed and implemented in accordance with Ministerial Order No. 1359, made under the Education and Training Reform Act 2006 (Vic).

The College Deputy Principal is the Senior Child Safety Officer.

The Principal and Deputy Principal will:

- ensure effective child safety and wellbeing governance, policies, procedures, codes and practices are in place and followed;
- model a child safe culture that facilitates the participation of students, families and staff in promoting and improving child safety and wellbeing;
- enable inclusive practices where the diverse needs of students are considered;
- reinforce high standards of respectful behaviour between students and adults, and between students;
- promote regular open discussion on child safety issues within the College community including at leadership team meetings, staff meetings and College Council meetings;
- facilitate regular professional learning for staff and volunteers (where appropriate) to build deeper understandings of child safety, student wellbeing, prevention of, and responding to abuse; and
- create an environment where child safety complaints and concerns are readily raised, and no one is discouraged from reporting an allegation of child abuse to relevant authorities.

5.2 School staff and volunteers

All staff and volunteers will:

- participate in child safety and wellbeing induction and training provided by the College and follow the College child safety and wellbeing policies and procedures;
- act in accordance with the College Child Safety Code of Conduct;
- identify and raise concerns about child safety issues in accordance with the College Child Safety Responding and Reporting Obligations Policy and Procedures, including following the PROTECT *4 Critical Actions to identify and respond to child abuse* based on the most likely source of abuse:
    - Source: Adult engaged by an independent school;
    - Source: Student-to-student;
    - Source: In the family;
    - Source: In the community.

  For more information, please refer to: https://www.vic.gov.au/4-critical-actions-schools.
- ensure student views are taken seriously and their voices are heard about decisions that affect their lives;
- implement practices that respond appropriately to the diverse needs of students; and
- report any suspicion that a child's safety may be at risk to the relevant Head of School. (Or if their Head of School is involved in the suspicion, report to the Principal or if involving a contractor, report to the Business Manager, or another member of the College Executive Team).

The College Child Safety and Mandatory Reporting Flowchart provides additional advice on who to report to in certain circumstances.

5.3 College Council

In performing the functions and powers given to them under the *Education and Training Reform Act 2006*, College Council members will:

- embed and promote a child safe culture with the broader College community;
- ensure that child safety is a regular agenda item at Council meetings;
- monitor and evaluate the implementation and effectiveness of its risk controls;
- authorise the policies and procedures concerning child safety in the College;
- undertake annual training on child safety;
- approve updates to, and act in accordance with the Child Safety Code of Conduct to the extent that it applies to College Council employees and members; and
- when appointing College Council employees and members, ensure that selection, supervision, and management practices include requirements for child safety.

5.4 Specific staff child safety responsibilities

Oxley has appointed Child Safety Officers to support the Principal to implement College child safety policies and practices, including staff and volunteer training.

The responsibilities of the child safety officers are outlined in their position descriptions.

The College Senior Child Safety Officer is the first point of contact for child safety concerns or queries, and for coordinating responses to child safety incidents.

The Principal or delegate is responsible for monitoring the College compliance with the Child Safety and Wellbeing Policy. Anyone in the wider College community should contact the Principal if they have any concerns about the College compliance with the Child Safety and Wellbeing Policy.

Other specific roles and responsibilities are named in other child safety policies and procedures, including the Child Safety Code of Conduct, Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures, and Child Safety Risk Register.

The College has a Child Safety and Wellbeing Team that meet regularly to identify and respond to any ongoing matters related to child safety and wellbeing.

The College Senior Child Safety Officer monitors the College Child Safety Risk Register.

Further reporting details and obligations are provided in the Child Safety Responding and Reporting Policy and the Mandatory Reporting Policy.

6. Child Safety Code of Conduct

The College Child Safety Code of Conduct sets the boundaries and expectations for appropriate behaviours between adults and students. It also clarifies behaviours that are not acceptable in College physical and online environments.

The College ensures that students also know what is acceptable and what is not acceptable, so that they can be clear and confident about what to expect from adults in the school.

The Child Safety Code of Conduct also includes processes to report inappropriate behaviour.

7. Managing Risks to Child Safety and Wellbeing

The College identifies, assesses and manages risks to child safety and wellbeing in College physical and online environments. These risks are managed through the child safety and wellbeing policies, procedures and practices, and in the activity specific risk assessments, such as those developed for off-site overnight camps, adventure activities and facilities and services contracted through third party providers for student use.

A College Child Safety Risk Assessment is used to record any identified risks related to child abuse alongside actions in place to manage those risks. The College Executive will regularly monitor and evaluate the effectiveness of the actions in the Child Safety Risk Assessments.

In the College online environment, the College engages in the following strategies to help promote child safety and manage risks:

- A commitment to a cyber safety program across all year levels.
- The use of filtering software.
- The adoption of acceptable usage agreements for students, and consent and indemnity agreements with parents.
- Privacy Impact Assessments related to third party software applications.
- Careful monitoring and response to unacceptable or risky online behaviour.

The Primary / Secondary Student ICT Acceptable Use Agreement and related policies outline some of these approaches in more detail.

8. Establishing a culturally safe environment

The College is committed to establishing an inclusive and culturally sensitive environment where the strengths, values and practices of all cultures are respected in accordance with the Christian ethics and values of the College.

The LMC Ltd statement on understanding of race and cultural safety outlines the background approach to maintain an inclusive and culturally safe place for Aboriginal and Torres Strait Islander students.

Therefore, the College supports all vulnerable and potentially vulnerable students by reason of culture, through:

- Commitments to all applicable legal standards and policies of non-discrimination;
- Child safe and Privacy policies;
- Student discipline and protection codes;
- Wellbeing and Home Group pastoral care programs;
- Recognition of different approaches to parenting children;
- Development of participatory and empowerment practices for students in classrooms, student led leadership, chapels and assemblies; and
- Maintenance of a child-friendly school culture.

The College upholds all student rights to be treated fairly and with dignity. The College is committed to fostering a culture of openness and respect. This includes modelling exemplary Christian behaviour and communicating the College's commitment to a safe learning environment for all students.

By way of contextual support for the indigenous peoples then, the College:

- Recognises the inherent worth of each person as created in the image of God and worthy of respect and dignity;
- Promotes the concept of a single human race in which humans are not categorised further by minor biological, evolutionary or cultural variations, or geographic isolation;
- Promotes human rights to all people as historically attributed by the Civil Liberties of Western Democracies, including equality before the law;
- Acknowledges the citizenship of Aboriginal and Torres Strait Islander people under the Constitution of Australia;
- Acknowledges the problematic attitudes and practices of some of our European ancestors directly involved with the recent ancestors of indigenous peoples;
- Promotes the principles of cultural safety and participation in cultural events that are not in conflict with the College Christian ethos;
- Promotes psychological safety and acknowledges the right to tell one's story;
- Promotes the shared human need for connection and understanding;
- Acknowledges the indigenous status of the original inhabitants of Australia, not as a single sovereign nation but as disparate nomadic tribes;
- Acknowledges the specialised knowledge of country and hunter – gatherer skills of indigenous tribes;
- Acknowledges indigenous skills in their art, music, dance and cultural artifacts;
- Understands that a deficit discourse in schools surrounding indigenous students hinders their success;
- Understands the lack of a homogenous indigenous culture and groupings in past and current-day circumstances;
- Opposes any racial categorisation of indigenous people.
- Provides professional development for staff about cultural safety issues and the strategies to create a culturally safe environment.

9. Student empowerment

To support child safety and wellbeing at Oxley, staff work to create an inclusive and supportive environment that allows students and families to contribute to a child safety approach and to understand their rights and responsibilities.

Respectful relationships between students are reinforced, strong friendships are encouraged and peer support in the College ensures a sense of belonging through student leadership meetings, College camps, student assemblies, Chapel services and class Home Group activities.

Students are informed of their rights through curriculum studies in health education, student home group sessions and student assemblies, and are given the skills and confidence to recognise unsafe situations with adults or other students, and to speak up and act on concerns relating to themselves or their peers. The College ensures students know who to talk to if they are worried or feeling unsafe and they are encouraged to share concerns with a trusted adult at any time. Families can also access information on how to report concerns at the parent portal via the College website.

When the College is gathering information in relation to a complaint about alleged misconduct or abuse of a child, it will listen to the complainant's account and take it seriously, check an understanding of the complaint, support the student and keep them and their parents and carers, as appropriate, informed about progress.

10. Family engagement

Families and the College community have an important role in monitoring and promoting children's safety and wellbeing and helping children to raise any concerns.

To support family engagement, Oxley is committed to providing families and its community with accessible information about the College's child safe policies and practices and involving them in its approach to child safety and wellbeing.

Opportunities are created for families to have input into the development and review of the child safety policies and practices.

The College does this by:

- Seeking input from families through regular communication on the College App, College website, intranet (portal pages), newsletter and specifically through biennial improvement surveys and student wellbeing surveys. Specific feedback on Child Safety is received via the various established College and student leadership committees;
- Making available child safety policies and procedures for students and parents on the College Website and / or the parent portal;
- Using the regular newsletters and College website to inform families and the College community about any significant updates to child safety policies or processes, and strategies or initiatives that are being taken to ensure student safety; and
- Displaying Child Safety posters around the College and making students aware of the expectations on their right to a safe environment.

11. Diversity and equity

As a child safe organisation, the College celebrates the diverse range of students, families and community and promotes respectful environments that are free from discrimination. The focus is on wellbeing and growth for all.

Staff recognise that every child has unique skills, strengths and experiences to draw on.

Staff pay particular attention to individuals and groups of children and young people in the College with additional and specific needs. This includes tailoring the child safety strategies and supports to the needs of vulnerable students.

The College seeks to eliminate unlawful discrimination while pursuing its purposes as a Christian school in accordance with its doctrines, tenets and beliefs as expressed in its Governing Standards. The College Diversity, Inclusion and Discrimination Prevention Policy provides more information about support for student diversity and equity.

12. Suitable staff and volunteers

Oxley has robust child safe recruitment, induction, training, and supervision practices to ensure that all staff, contractors, and volunteers are suitable to work with children.

12.1 Staff recruitment

When recruiting staff, Oxley undertakes a comprehensive recruitment and screening process for all workers and volunteers which aims to:

- Promote and protect the safety of all children under the care of the College;
- Identify the most suitable people who share Oxley's Christian ethics, values and commitment to protect children; and
- Prevent a person from working at Oxley if they pose a risk to children.

When engaging staff to perform child-related work, the College will:

a. sight, verify and record the person's Working with Children Clearance (WWCC) or equivalent background check such as teacher (VIT) registration.
    - Persons applying for a role as a teacher at Oxley must be registered with the Victorian Institute of Teaching (VIT) and are, therefore, not required to hold a Working with Children Clearance.
    - All persons (excluding teachers) engaged in child-related work, including volunteers, are required to hold a Working with Children Clearance and to provide evidence of this clearance.
    - A WWCC Register is maintained by the College.

b. collect and record:
    - proof of the person's identity and any professional or other qualifications;
    - the person's history of working with children; and
    - references that address suitability for the job and working with children.

12.2 Staff induction

All newly appointed staff are expected to participate in the College child safety and wellbeing induction program. The program includes a focus on:

- the Child Safety and Wellbeing Policy (this document);
- the Child Safety Code of Conduct;
- the Child Safety Reporting Process Guidelines; and
- other child safety and wellbeing information that College leadership considers appropriate to the nature of the staff member's role.

12.3 Ongoing supervision and management of staff

All staff engaged in child-connected work are supervised appropriately to ensure that their behaviour towards children is safe and appropriate.

Staff will be monitored to ensure their continuing suitability for child-connected work. This will be done through the College annual staff development reviews.

- New staff undergo a 6-month review which, among other things, reaffirms their knowledge and understanding of child safety and expected behaviours.
- Volunteers work under the supervision of a registered teacher to ensure they understand the College's commitment to child safety and that everyone has a role to play in protecting children from abuse, as well as checking that their behaviour towards children is appropriate.
- Any inappropriate behaviour will be reported through internal mechanisms, and, if required, appropriate external channels such as the Department of Families, Fairness and Housing (DFFH), the Victoria Police, and the Social Services Regulator.
- Inappropriate behaviour towards children and young people will be managed swiftly and in accordance with College policies and legal obligations.

12.4 Suitability of volunteers

All volunteers are required to comply with the Volunteer Guideline and Agreement in which is described the suitability of prospective volunteers and an outline of expectations in relation to child safety and wellbeing induction and training, and supervision and management.

13. Child safety knowledge, skills and awareness

Ongoing training and education are essential to ensuring that staff understand their roles and responsibilities and develop their capacity to effectively address child safety and wellbeing matters.

In addition to the child safety and wellbeing induction, College staff will participate in a range of training and professional learning to equip them with the skills and knowledge necessary to maintain a child safe environment.

Staff child safety and wellbeing training will be delivered at least annually and will include guidance on:

- the College's child safety and wellbeing policies, procedures, codes, and practices;
- completing the Protecting Children – Mandatory Reporting and Other Legal Obligations online module annually;
- recognising indicators of child harm, including harm caused by other children;
- responding effectively to issues of child safety and wellbeing and supporting colleagues who disclose harm;
- how to build culturally safe environments for children and students;
- information sharing and recordkeeping obligations; and
- how to identify and mitigate child safety and wellbeing risks in the College environment.

Other professional learning and training on child safety and wellbeing, for example, training for volunteers, will be tailored to specific roles and responsibilities and any identified or emerging needs or issues.

14. College Council training and education

To ensure the College Council is equipped with the knowledge required to make decisions in the best interests of student safety and wellbeing, and to identify and mitigate child safety and wellbeing risks in the College environment, the Council is trained at least annually.

Training includes guidance on:

- individual and collective obligations and responsibilities for implementing the Child Safe Standards and managing the risk of child abuse;
- child safety and wellbeing risks in the College environment; and
- College child safety and wellbeing policies, procedures, codes and practices.

15. Complaints and reporting processes

Oxley fosters a culture that encourages the College community to raise concerns and complaints. This makes it difficult for breaches of the code of conduct, misconduct or abuse to occur and remain hidden.

The College has clear pathways for raising complaints and concerns and responding and this is documented in the College's Resolution of Complaints and Appeals Policy, and the Complaints and Dispute Resolution Guideline for Staff.

If there is an incident, disclosure, allegation or suspicion of child abuse, all staff and volunteers must follow the Child Safety Responding and Reporting Obligations Policy and Procedures. The policy and procedures address complaints and concerns of child abuse made by or in relation to a child or student, College staff, volunteers, contractors, service providers, visitors or any other person while connected to the College.

As soon as any immediate health and safety concerns are addressed, and relevant College staff have been informed, the College will:

- Follow the PROTECT *4 Critical Actions to identify and respond to child abuse* based on the most likely source of abuse:
    - Source: Adult engaged by an independent school;
    - Source: Student-to-student;
    - Source: In the family;
    - Source: In the community.
- For more information, please refer to: https://www.vic.gov.au/4-critical-actions-schools.

The Oxley Child Safety and Wellbeing Policy and Anti-Bullying Policy cover complaints and concerns relating to student physical violence or other harmful behaviours.

16. Privacy and information sharing

The College collects, uses, and discloses information about children and their families in accordance with Victorian privacy laws, the Australian Privacy Principles and other relevant laws. For information on how the College collects, uses and discloses information, refer to the College Privacy Policy.

17. Records management

The College acknowledges that good records management practices are a critical element of child safety and wellbeing and manage records in accordance with the College security framework and the Australian Society of Archivists Records Retention and Disposal Schedule for Non-Government Schools.

18. Review of child safety practices

Oxley has established processes for the review and ongoing improvement of child safe policies, procedures, and practices.

The College will:

a. review and improve this policy every 2 years, or after any significant child safety incident;

b. analyse any complaints, concerns, and safety incidents to improve policy and practice; and

c. act with transparency and share pertinent learnings and review outcomes with staff.

19. Related policies and procedures

This Child Safety and Wellbeing Policy is to be read in conjunction with other related College policies, procedures, and codes. These include our:

- Anti-Discrimination Policy;
- Anti-Bullying Policy;
- Child Safe Responding and Reporting Obligations Policy and Procedures;
- Child Safety Code of Conduct;
- Resolution of Complaints and Appeals Policy;
- Complaints and Dispute Resolution Guideline for Staff;
- Student ICT Acceptable Use Agreement;
- Diversity Inclusion and Discrimination Prevention Policy;
- Gender Identity Policy;
- Visitors Policy; and
- Volunteer Guideline and Agreement.

20. Policy status and review

The Principal is responsible for reviewing and updating the Child Safety and Wellbeing Policy at least every two years.