



<b>Policy Number:</b>	PPPC0392(2)
<b>Policy Owner:</b>	College Principal
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<b>Approved by:</b>	College Leadership Team
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*OLMC Parramatta is a Christ-centred community founded in the Mercy tradition. Guided by Gospel values of mercy and justice, its policies aim to uphold the dignity and uniqueness of each person, supporting the holistic wellbeing of all in a safe, caring and sustainable environment.*

## 1. Purpose

Our Child Safe Policy demonstrates the commitment of the College to providing a safe environment for the children and young people in its care. It is the principal policy document in a suite of child safe documentation that outlines the College's Child Safe program, promoting a robust child safe culture.

The College Board and College Leadership Team are committed to the implementation of the NSW Child Safe Standards and the development of work practices, policies and procedures that will ensure the promotion of child safety within the College.

## 2. Scope

This policy applies to all members of the college community, including but not limited to:

- students
- staff (teaching and non-teaching)
- volunteers
- contractors
- parents/carers
- visitors

This policy applies in all College environments, including physical (including but not limited to on-site and off-site College grounds, sporting events, camps, excursions), virtual and online environments

## 3. Definitions

**Adult** – a person aged 18 years or over

**Bullying** – a person or group of people, in person or online, repeatedly and intentionally using words or actions or the inappropriate use of power, against someone or a group of people to cause distress and risk to their wellbeing.

**Child/Young Person or Child or Children** - means a person who is under the age of 18 years

**Child abuse** includes:

- **Physical abuse**

- hitting, striking, punching, kicking or slapping a child;
  - engaging in rough physical games;
  - throwing items or using items to hurt a child;
  - dragging or pushing a child;
  - threatening to hurt a child through words, gestures, regardless of whether the person actually intends to apply force; and
  - using hostile force towards a child and/or a pattern of hostile or unreasonable and seriously inappropriate physical conduct.
- **Sexual abuse** – occurs when an adult or a person in authority involves a child/young person in any sexual activity and may include the following:
    - sexual touching of a child;
    - sexual contact with a child;
    - masturbating in front of a child or exposing genitals;
    - possessing or creating child abuse material;
    - sharing sexually explicit photos of a child;
    - exposing a child to pornography or other indecent material;
    - giving a child gifts, food, money, attention or affection in exchange for sexual activities or images;
    - not respecting the privacy of a child when they are using the bathroom or changing;
    - communicating (including online) with a child about romantic, intimate or sexual feelings for a child;
    - using a camera to record a child while they are dressing, bathing or using the bathroom;
    - comments that express a desire to act in a sexual manner with a child;
    - using sexual language or gestures in the presence of children; and
    - sexual comments conversations or communications with a child.
- **Sexual offence** under the Crimes Act 1900
    - ‘contact behaviour’ including sexual intercourse, kissing, fondling, sexual penetration, exploiting a child or young person through prostitution; and
    - ‘non-contact behaviour’ including flirting, sexual innuendo, inappropriate text messaging, inappropriate photography.
- **Sexual misconduct**
    - descriptions of sexual acts without a legitimate reason to provide the descriptions;
    - sexual comments, conversations or communications; and
    - comments to a child that express a desire to act in a sexual manner towards the child, or another child.
- **Emotional abuse**
    - teasing a child;
    - yelling at a child;
    - bullying a child;
    - persistent criticism and discrediting of a child;
    - persistent rejection of or hostility towards a child;
    - refusing to acknowledge a child’s worth and the legitimacy of their needs;
    - deliberately preventing a child from forming friendships;
    - depriving a child of essential stimulation and responsiveness;
    - encouraging a child to engage in destructive, antisocial behaviour;
    - exposing a child to family violence; and
    - making a child feel worthless, unloved alone or frightened.

- **Neglect**
  - depriving a child of necessities such as food and drink, clothing, critical medical care or treatment, or shelter;
  - failing to protect a child from abuse (such as, failing to report abuse when a child discloses it or when a staff member observes it);
  - exposing a child to a harmful environment (such as, an environment where there is illicit drug use or illicit drug manufacturing); and
  - failing to adequately supervise a child, resulting in injury or harm.
  
- **Ill-treatment**
  - making excessive and/or degrading demands of a child;
  - disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner;
  - seriously inappropriate and/or degrading comments or behaviour towards a child;
  - repeated hostility towards a child;
  - seclusion and other types of restrictive practices;
  - locking up a child in a room; and
  - pushing a child to train or perform when they are injured.
  
- **Grooming**
  - engaging in unauthorised contact with a child online for the purpose of developing a sexual relationship;
  - using a computer, mobile phone, camera or other device to exploit or harass a child;
  - unacceptable personal communication that explores sexual feelings or intimate personal feelings with a child;
  - sharing details with a child of one's own sexual experiences;
  - inappropriately extending a relationship with a child outside of work;
  - giving a child special attention or isolating them from peers with the intention of making it easier to access the child for sexual activity;
  - offering a child gifts, food, cigarettes, money, attention or affection with the intention of making it easier to access the child for sexual activity; and
  - making close physical contact, like inappropriate tickling and 'play' wrestling.
  
- **Failure to prevent/report abuse**
  - an obvious or very clearly unreasonable failure to respond to information strongly indicating that another adult working at the organisation poses a serious risk of abusing a child;
  - knowing or believing, that a child has been abused and not reporting it to police (or not reporting in circumstances where the person ought reasonably to have known); and
  - exposure to pornography or nudity.
  
- **WWCC – Working with Children Check**

## **4. Policy**

### **4.1 Background - How does a Child Safe Policy support a Child Safe culture?**

The Royal Commission into Institutional Responses to Child Sexual Abuse identified a Child Safe Policy as a key document in establishing an organisation's approach to keeping children safe from harm and abuse. It demonstrates how the College values children and describes how it intends to embed Child Safe practices into its day-to-day activities.

A Child Safe policy is part of the College's suite of child safe documents which includes:

- **Safeguarding Young People Statement of Commitment** – describes our Child Safe values;
- **Child Safe Code of Conduct** – lists acceptable and unacceptable behaviours;
- **Child Protection Policy** – details our reporting and investigation processes;
- **Recruitment Policy** – describes how we recruit suitable workers, how we onboard, support, supervise and train them;
- **Child Safe Risk Management Plan** – identifies and aims to reduce specific risks within the organisation; and
- **Child Safe Action Plan** – identifies strategies to mitigate risk and support the implementation of the Child Safe Standards.

### **Prioritising the safety of children and young people**

Children's safety is the most important focus of any child-related organisation. This is known as the **paramountcy principle** and is evident in all aspects of the College's values, how it is championed by its leaders, and how it is embedded into everyday practice.

The Child Safe policy is the starting point for meeting this obligation.

- it clearly defines the roles and responsibilities of all adults interacting with children and young people;
- the manner of the interactions – what is acceptable and not acceptable;
- states the intention of the College's risk management processes;
- links to any documentation that the College has in place to reduce or eliminate risk; and
- describes the organisation's reporting obligations – internal and external.

### **Child Safe Organisational Culture**

A Child Safe culture is:

- a commitment by all staff to a shared purpose, value, mindset and set of behaviours, where children and their safety are placed at the heart of the College;
- shown in how leaders establish and reflect the paramountcy principle through their behaviours;
- seen in how the safety and wellbeing of children is embedded into all policies and procedures the College implements;
- demonstrated in the College's rituals, stories and day-to-day practices; and
- seen in the College's relationships with colleagues, children, young people, families, community members and other stakeholders.

Child Safe cultures create environments where it becomes more difficult to abuse and where it's easier to detect abuse if it occurs. The College's policies and procedures document how the College intends to create, maintain and improve a Child Safe culture.

## 4.2 Child Safe Standards

The application of the Child Safe Standards will assist the College to improve its systems for the prevention, identification and reporting of abuse. The Standards also support the need for child safe policies.

Standard	Application at OLMC
<b>Std 1:</b> Child safety is embedded in organisational leadership, governance and culture.	The creation of policies that reflect the intention of the Child Safe Scheme, demonstrates leaders commitment to them. Leaders model their own behaviour on the way they expect others to act when working with children and young people.
<b>Standard 2:</b> Children participate in decisions affecting them and are taken seriously	Children and young people are given ongoing opportunities to have input into the creation and improvement of child safe policies
<b>Standard 3:</b> Families and communities are informed and involved	Families know their children best and should be consulted during the creation or reviewing of Child Safe policies
<b>Standard 4:</b> Equity is upheld and diverse needs are taken into account	By supporting equity and diversity, the College can help ensure all children they care for have their needs understood and met
<b>Standard 5:</b> People working with children are suitable and supported	Making the commitment to child safety and wellbeing clear in recruitment advertising and documentation. Requiring all staff, contractors and volunteers maintain a valid WWCC clearance. Child safety induction and annual training programs that include how to report child safety incidents or concerns to the College and relevant external authorities. Staff are supported to ensure that they understand their child safe responsibilities.
<b>Standard 6:</b> Processes to respond to complaints of child abuse are child focused	The responses the College will put in place if those who interact with children and young people breach its policies, procedures and codes of conduct
<b>Standard 7:</b> Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training	Adults working with children are given information and training on Child Safe practices and the organisation's policies and procedures
<b>Standard 8:</b> Physical and online environments minimise the opportunity for abuse to occur	Child Safe policies should help to ensure that all workers, volunteers, children and young people understand the risks of both physical and online environments and have access to age and ability appropriate information on how to report any concerns they have

Standard	Application at OLMC
<b>Standard 9:</b> Implementation of the Child Safe Standards is continuously reviewed and improved.	A Child Safe culture is created, maintained and improved in a varied and dynamic environment. The College will ensure that systems are in place to monitor and improve the implementation of the Child Safe Standards
<b>Standard 10:</b> Policies and procedures document how the organisation is child safe	Effective policies and procedures help adults, children and young people know the behaviour that is expected of them in this College

### 4.3 Safeguarding Young People Statement of Commitment

The College is committed to providing a safe and inclusive place for children. This commitment is recorded in the College’s Safeguarding Young People Statement of Commitment.

### 4.4 Key Principles of the College’s Child Safe Culture

These include:

#### 4.4.1 Child Centred Approach

The best interests and well-being of the child are paramount in all considerations and actions.

#### 4.4.2 Zero Tolerance for Child Abuse

OLMC Parramatta has zero tolerance for child abuse in any form, including physical, emotional, neglect, verbal and sexual abuse.

#### 4.4.3 Inclusive and Respectful Culture

OLMC Parramatta promotes a culture of respect, inclusivity and diversity, fostering an environment where every student feels valued and supported. We uphold the rights of all children to participate to their full capacity, regardless of their gender, race, ability or cultural background.

#### 4.4.4 Staff Training and Awareness

All staff, volunteers, and contractors undergo regular training on child protection policies and procedures.

#### 4.4.5 Reporting and Responding

There are clear procedures for reporting and responding to concerns or allegations of child abuse, ensuring a prompt and thorough investigation.

#### 4.4.6 Code of Conduct

All members of the college community are expected to adhere to a Child Safe Code of Conduct that includes guidelines on appropriate behaviour, interactions and communication with students.

#### 4.4.7 Recruitment and Screening

OLMC Parramatta implements rigorous recruitment and screening processes for all staff, volunteers, and contractors who will have contact with students.

#### 4.4.8 Communication and Education

Regular communication and education programs are conducted to raise awareness of child safety issues and ensure that all members of the college community are informed and vigilant.

#### **4.4.9 Review and Evaluation**

This policy is regularly reviewed annually to ensure its effectiveness and compliance with current legislation and best practices. Any updates or changes are communicated to the college community.

#### **4.4.10 Reporting and Complaints Handling**

Clear procedures are in place for reporting and handling complaints related to child safety concerns. Confidentiality is maintained, and retaliation is strictly prohibited.

### **4.5 Policy Breach**

Failing to observe this policy and any supporting policies, procedures or codes of conduct may lead to disciplinary action in accordance with the College's disciplinary policy. This could include:

- remedial education
- counselling
- increased supervision
- the restriction of duties
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

In the event of a breach of the law, the matter will be reported to NSW Police or other relevant government agency.

The advice in this policy should be always followed. In the event of an emergency staff members should contact the Principal, as well as relevant authorities.

### **4.6 Child Safe Risk Management**

The College has a Child Safe Committee that is responsible for reviewing the Child Safe Risk Management Plan on an annual basis and developing strategies to eliminate or mitigate any potential risks to child safety. These risks and mitigation strategies are recorded in the Child Safe Risk Management Plan and the Child Safe Action Plan.

### **4.7 Child Safety Privacy and Information Sharing**

The College collects, uses and discloses information about students and their families in accordance with privacy laws and other relevant laws, including laws that permit the College to disclose information about child safety to external people and agencies.

The College maintains confidentiality and privacy for students and their families in accordance with federal and state privacy legislation.

### **4.8 Communication**

The College is committed to communicating child safety strategies, policies and procedures to the College community. In addition, child safety is a regular agenda item at College Leadership Team meetings.

## 5. Procedures

OLMC Parramatta fosters a culture that encourages all community members to raise any concerns or complaints regarding child safety as quickly as possible with the College Principal. A more detailed process is recorded in the College's Child Protection Policy.

## 6. Responsibilities

Child safety and wellbeing is a responsibility shared by all adults in the College community.

### 6.1 The **College Principal** is responsible for:

ensuring that the Child Safe Standards and Child Safe Policy are implemented, managed and reported.

### 6.2 The **College Leadership Team** is responsible for:

- approving the Child Safe Policy and to ensure that appropriate policies and procedures are in place to assist all to comply with this policy;
- ensuring staff have access to and understand this policy and have access to any supporting resources;
- ensuring contractors and volunteers have access to and understand this policy;
- providing training and advice in the application of this policy; and
- communicating any updates to this policy to relevant stakeholders.

### 6.3 **Staff, Contractors and Volunteers** are responsible for:

- ensuring that they comply with all aspects of this policy and implement the Child Safe Standards; and
- reporting any breach of this policy by others or themselves to the Principal.

All **workers, paid or unpaid**, who work with children are required to:

- comply with this policy and prioritise the prevention of harm to children and young people;
- uphold the rights of children and actively empower them to participate to the best of their ability;
- provide a safe and inclusive environment free from discrimination or harassment;
- report any breach (of this policy, procedure or Child Safe Code of Conduct) to their manager;
- take steps to ensure all children can actively contribute to the organisation regardless of their ability, race, gender or cultural background;
- use positive and encouraging language when working with children;
- refrain from language that is discriminatory, racist, sexist, offensive or belittling;
- act on any concerns raised by a child that indicate they may be unsafe;
- avoid situations that place children at risk of harm;
- refrain from any conduct that is considered abusive, neglectful or grooming;
- notify and seek approval for any interaction with a child outside our services, either professionally or personally, unless that child is a close family member;
- hold a Working with Children Check (WWCC) clearance, unless exempt; and
- provide their WWCC number when requested for verification.

6.4 **Parents/Carers and Members of the College Community** are responsible for:

- ensuring that they comply with the appropriate behaviour standards in the Child Safe Code of Conduct.

## 7. **Review**

This policy will be reviewed every year unless legislative or other changes require a more urgent review.

## 8. **References**

### 8.1 **Related Policies, Procedures, Registers and Sites**

PPPC0031 Child Protection Policy  
PPPC0392 Child Safe Policy  
PPPC0385 Safeguarding Young People Statement of Commitment  
PPPC0057 Student Management Policy  
PPPC0058 Student Wellbeing Policy  
OLMC Child Safe Risk Management Plan (CSRMP)  
OLMC Child Safe Action Plan

### 8.2 **Related Legislation**

Children’s Guardian Act 2019  
Child Protection (Working with Children) Act 2012  
Child Protection (Working with Children) Regulation 2013  
Children and Young Persons (Care and Protection) Act 1998  
Crimes Act 1900  
Children and Young Persons (Care and Protection) Regulation 2012  
Children and Young Persons (Care and Protection) (Child Employment) Regulation 2015  
Disability Inclusion Act 2014  
Anti-Discrimination Act 1977  
United Nations Convention of the Rights of the Child  
Child Safe Standards

## 9. **Communication**

<b>Audience</b>	<b>Communicated by</b>	<b>Communication pathway</b>
Parents/carers	College Principal or their delegate	Newsletter and website
Staff	College Principal or their delegate	General Staff Meeting or email
Students	College Principal or their delegate	College assembly, House or Year meeting or email

