

# Student Protection and Safety Policy

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## Introduction

Gippsland Grammar (the **School**) is committed to protecting its students from all aspects of harm, and has established strategies, practices, policies and procedures to uphold this public commitment.

The School takes a zero tolerance approach to any behaviours that jeopardise student safety (including child abuse and reportable conduct). The School regards its student safety responsibilities with the utmost importance, and strives to deliver an academic care model that promotes the School's core values of compassion, leadership, excellence, respect and responsibility.

The School's aim is to create an environment where students can learn in a calm and focused environment characterised by ethical behaviour and defined professional boundaries, and where they feel safe and supported by the School.

The School recognises that any person in authority within, or in relation to the School has a statutory duty under section 49O of the *Crimes Act 1958* (Vic) to protect students studying at the School from any substantial risk that they will become the victim of a sexual offence committed by another person who is 18 years of age or more and associated with the School.

In addition, the School has a pastoral, moral and legal responsibility to create an inextricable connection between student safety, wellbeing and learning, especially in a positive environment where enjoyment and a passion for excellence is shared by all.

This connection will be the foundation of all decisions made, and actions taken by the School when delivering quality education to its students. At all times, the ongoing safety of its students will be at the forefront of mind, and the School's primary focus.

The School treats seriously its reporting obligations in relation to student safety matters, including to the Commission for Children and Young People and Victoria Police. The School recognises that whilst reporting obligations may differ depending on a person's position within the School, all staff are required to uphold the ethos of this policy by ensuring that student safety matters are reported internally, and externally where required.

As such, this Policy sets out how the School will meet its responsibilities and commitment to student safety, and is a child safety policy made in accordance with *Ministerial Order No. 1359–Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and Boarding Premises*.

This Policy is part of the School's Student Protection Program.

## Scope

This Policy applies to all Board members, the Principal, employees, volunteers, contractors and other authorised personnel required to perform functions on the School's premises, or at School-organised activities and events. Collectively, these individuals are referred to as 'staff'.

This Policy extends to any other person who is engaged in student-connected work at the School, or that otherwise has direct and regular contact with the School's students (whether supervised or not).

## Definitions

A number of terms in this Policy are defined in the Student Protection Program Definitions document (a copy of which is available on Complispace and the School's website).

## Relevant Principles

The School's commitment to student safety and wellbeing is based on the following overarching principles and values (which are set out below) that guide the development and regular review of strategies, practices, policies and procedures to uphold our commitment to protect students from all forms of harm.

- 1 All students at the School have a right to be safe and to feel safe.
- 2 The welfare and the best interests of the student are paramount.
- 3 The views of the student and a student's privacy must be respected.
- 4 Clear expectations for appropriate behaviour by staff with students must be established, including in the Student Protection Staff Code of Conduct.
- 5 The safety of students is dependent upon the existence of a student safe culture.
- 6 Student safety and wellbeing awareness is embodied, promoted and openly discussed within our School community.
- 7 Families can participate in decisions affecting their child and they, and the School community, are engaged and informed about the School's approach to student safety and wellbeing.
- 8 The School community is informed about the School's operations and governance.
- 9 Procedures are in place to screen all staff, contractors, volunteers and external education providers who engage in student-connected work (whether occurring on the School grounds or at a location connected to the School).
- 10 Student safety and wellbeing is everyone's responsibility.
- 11 Annual student safety and wellbeing training is mandatory for all members of the Board, the Principal, staff and anyone else otherwise engaged by the School in relation to student-connected work.
- 12 Procedures for reporting and responding to alleged or suspected incidents of child abuse or reportable conduct (including the complaints process and support available) are clearly communicated and accessible for all members of the School community. This includes

students and otherwise, members of the School community, who must have access to information and support in a reader friendly, accessible, culturally safe and age appropriate manner.

- 13 Students from culturally or linguistically diverse backgrounds have the right to special care and support.
- 14 Students who identify as Aboriginal or Torres Strait Islander have the right to special care and support.
- 15 Students with a disability have the right to have special care and support.
- 16 Staff have regard to a student's diverse circumstances and needs, so that they can provide support and respond to those who are vulnerable and to ensure equity is upheld in policy and practice.
- 17 Staff working with students will be suitable and supported to ensure student safety and wellbeing values are reflected in the School environment.
- 18 Ensuring the safety and wellbeing of students in relation to visitors to the School, including third parties contracted to provide services either directly or indirectly to or for students.

All persons to whom this Policy applies are responsible for complying with the School's student safety and wellbeing strategies, policies and procedures.

## **Statement of Commitment to Student Safety**

### A student safe school culture

Creating and maintaining a student safe culture requires input from the entire School community. Our aim, is to provide a safe environment that aligns with the core values of academic care at Gippsland Grammar; compassion, leadership, excellence, respect and responsibility.

To achieve this, we promote a model of education where students are understood not just as learners, but as an integral part of the School and broader community. As such, we value wellbeing and resilience, celebrate diversity, and embrace a growth mindset, through classroom experiences, and in our approach to academic care, practices policies and procedures.

Through our processes and practices, we also ensure that a student safe culture is championed and modelled at all levels of the School, from the top down to the bottom up. Accordingly, student safety and wellbeing is embedded in our school leadership, governance and culture. We do this by setting clear expectations regarding student safety to our staff school community (including staff and students), and ensuring that at all times, our governance arrangements facilitate the implementation of this policy (including by making student safety and wellbeing a standing agenda item and reviewing the School's student safe processes across all levels).

The commitments, values and principles which guide the School are further outlined below.

### Support and engagement of all students

The School appreciates that a student safe environment looks different for every student, and in delivering this, supports and respects the cultural safety and wellbeing of Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds, as well as the safety of students with a disability or who are otherwise vulnerable (including students who identify as LGBTQIA+, and those with challenging home situations).

Our primary focus in delivering academic care, education and through decision-making, is that all students are safe, feel safe, and are able to create and develop a range of strategies and skills, which can be used flexibly to flourish in all aspects of their lives. As such, we support and encourage students to talk openly and share their views, particularly about matters that directly impact them.

The School will aim to ensure students (and their parents) are provided with the necessary skills and knowledge to understand and maintain their own personal safety and wellbeing, including:

- 1 Understanding, identifying, discussing and reporting student safety and wellbeing matters.
- 2 Standards of behaviour for students attending the School.
- 3 Healthy and respectful relationships (including those relating to gender and sexuality).
- 4 Resilience.

The School will aim to ensure that staff are provided with the necessary skills and knowledge to understand and maintain a student and culturally safe environment, including through:

- 1 Actively supporting and encouraging Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds and their families to:
  - (a) Express their culture and enjoy their cultural rights.
  - (b) Facilitate participation and inclusion in all aspects of school life.
- 2 Implementing and embedding strategies within the school community that acknowledge and appreciate the strengths of Aboriginal culture, and understand its importance to the wellbeing and safety of Aboriginal children and students.
- 3 Cultural training to improve understanding and respect (particularly with regard to Aboriginal and Torres Strait Islander culture), appreciation of culturally sensitive issues, including using appropriate language when referring to individuals or communities, and to equip staff to build culturally safe environments for children and young people.
- 4 Identifying, confronting and addressing incidences of racism seriously (noting it will not be tolerated), with the appropriate consequences and where appropriate with the involvement of Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds, and their families.
- 5 Ensuring that the School's strategies, practices, policies and procedures create a culturally safe and inclusive environment which values and respects the diverse and unique identities and experiences of Aboriginal and Torres Strait Islander children, young people and

students, (including their families), as well as others from culturally and linguistically diverse backgrounds.

- 6 Providing particular attention to the needs of students with a disability (or otherwise, additional needs), students from culturally and linguistically diverse backgrounds, international students, students who identify as LGBTQIA+ (or who are otherwise gender diverse) and those students who are unable to live at home.
- 7 Providing particular attention to the needs of Aboriginal and Torres Strait Islander students and promote and provide a culturally safe environment for them.

The School will promote its student safety and wellbeing practices to students in ways that are readily accessible, easy to understand and user-friendly, including through:

- 1 The appointment of the School's Student Protection Officers and a Senior Student Protection Officer who promote student safety;
- 2 Training staff to recognise the indicators of harm to students, including harm caused by not only adults but also other children and young people, and harm in an online environment.
- 3 Ensuring staff are trained and supported to effectively implement this Policy.
- 4 Collaborating with parents and guardians to ensure that they are provided with the information necessary to maintain consistent messaging about child abuse;
- 5 Encouraging students to identify safe and unsafe environments and situations (including in an online environment);
- 6 Distributing student-friendly publications, including student safety posters (eg. PROTECT poster);
- 7 Setting clear student safety and wellbeing standards so that staff, students and the School community are aware of the standards that are expected, and those which fall short of the School's expectations.
- 8 Clearly communicating where students can access support, make a report or obtain information; and
- 9 Ensuring that students have identified safety and support networks to overcome any barriers to disclosure

#### Raising and responding to student safety and wellbeing concerns

The School takes all allegations or disclosures of suspected child abuse and reportable conduct seriously, and responds to such allegations and disclosures promptly and thoroughly.

All instances of suspected child abuse or reportable conduct, allegations of child abuse or reportable conduct, or student safety concerns and complaints must be reported to the Principal, a member of the Executive Leadership Team, or a Student Protection Officer, and will be treated very seriously and consistently according to the School's and individual staff member's internal

and external reporting procedures and obligations.

The School has a Make a Report Procedure, available on the School's website, which sets out:

- 1 How concerns about actual and suspected child abuse and reportable conduct may be reported or raised with the School.
- 2 Who such concerns can be raised with at first instance, who include the Principal, the Executive Leadership Team and the School's Student Protection Officers.
- 3 How the concerns will be dealt with promptly and thoroughly by the School (including by complying with any legislative reporting obligations).
- 4 How the School will support or assist students (and their families) who disclose such concerns, or who are otherwise linked to such concerns.

The Make a Report Procedure applies to student safety and wellbeing concerns made by, or in relation to a student, School staff, visitors or other persons while connected to a school environment. The School will ensure that the Make a Report Procedure is student-focused, and can be easily understood by the School community, in particular students.

If staff believe that a student is at immediate risk of child abuse, they must phone 000.

#### Reporting a Sexual Offence: Failure to Protect Offence

Failure by a person in authority to protect a child under the age of 16 from criminal sexual abuse is also an offence under section 49O of the Crimes Act.

This applies where there is substantial risk that a child under the care, supervision or authority of an organisation (including a student of a school) will become a victim of a sexual offence by an adult associated with the School.

The person in a position of authority may be guilty of an offence if they know of the risk of abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so.

The offence requires an associated person to reduce or remove a 'substantial' risk. It is not a criminal offence to fail to address every possible risk that a sexual offence may be committed against a child. However, there are a number of factors to assist associated persons in identifying risks which amount to 'substantial' risks. These include:

- 1 The likelihood or probability that the child will become the victim of a sexual offence.
- 2 The nature of the relationships between a child and the adult who may pose a risk to the child.
- 3 The background of the adult who may pose a risk to the child, including any past or alleged misconduct.
- 4 Any vulnerabilities particular to a child, which may increase the likelihood that they may become the victim of a sexual offence.
- 5 Any other relevant fact which may indicate a substantial risk of a sexual offence being

committed against a child.

### Student safe employment practices

We believe that the safety of students is dependent on the existence of a student safe culture. Establishing that culture requires effective staff recruitment, supervision and management practices.

Student safety and wellbeing is a paramount consideration during the recruitment process. All staff working with children and young people must be suitable and reflect the School's values and commitment to student safety and wellbeing in practice.

The School takes all reasonable steps to employ skilled people to work with students and develops selection criteria and advertisements which clearly demonstrate our commitment to student safety and wellbeing, and an awareness of our social and legislative responsibilities.

All positions at the School that involve student-connected work will have a position description, which clearly sets out:

- 1 The position's requirements, duties and responsibilities regarding student safety.
- 2 The applicant's essential or relevant qualifications, experience and attributes in relation to education and student safety and wellbeing.
- 3 The School's ethos, values and commitment in respect of student safety and wellbeing.
- 4 How the School will support those who make disclosures.

All prospective staff will be informed about the School's student safety and wellbeing practices, and be subject to child protection screening in accordance with the School's obligations under legislation (including *Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and Boarding Premises*).

A successful candidate cannot commence at the School until written clearance in respect of child protection screening is obtained. Further, a current VIT registration or Working with Children Check (or equivalent) must be sighted by the School, and appropriately recorded before staff can engage in child connected work.

Appropriate and mandatory induction regarding the School's student safety and wellbeing practices will follow any successful appointment or engagement.

The School requires that staff act professionally, and in a way that embodies the School's commitment to student safety and wellbeing. The School has a Student Protection Staff Code of Conduct, available on the School's website, which sets out appropriate and inappropriate behaviours by staff. The School will take appropriate disciplinary action where a staff member is found to have acted contrary to that Code, or the School's other policies and procedures regarding appropriate standards of behaviour.

The School also acknowledges the complexities which arise at Blackwood Boarding House, where staff are required to interact with students in both their educational and personal spaces. The School will ensure that in addition to the above, staff engaged to work at Blackwood Boarding House are appropriately equipped (whether by way of experience, qualifications or training) to manage these complexities in accordance with the School's policies and procedures

(including the Blackwood Boarding House Handbook). Above all and at all times, staff engaged to work at Blackwood Boarding House are to ensure a student safe culture, particularly when the safety of a student is so entrusted to the School.

Staff will otherwise be subject to regular supervision, and periodic student safety checks, including to ensure their ongoing suitability for student-connected work.

At least annually, the School will ensure that appropriate guidance and training is provided to Board members and staff about:

- 1 Individual and collective obligations and responsibilities for managing the risk of child abuse and reportable conduct.
- 2 Child abuse and reportable conduct risks in the school environment (including Blackwood Boarding House).
- 3 The School's current student safety standards.

The Board will ensure that privacy and employment law obligations are met when responding to student concerns and complaints.

#### Risk management

The School proactively manages risks of abuse to students.

The School will develop and implement risk management strategies regarding student safety and wellbeing in the physical school environment (including Blackwood Boarding House) and online without compromising the student's right to privacy, access to information, social connections and learning opportunities. These strategies will identify, control and mitigate the risk(s) of child abuse and reportable conduct by taking into account the nature of the environment, the activities expected to be conducted in that environment (including the provision of services by contractors or outside organisations), and the characteristics and needs of all students expected to be present in that environment.

In addition, these strategies will place a positive responsibility on ensuring that student safety and wellbeing is actively promoted at the School.

Where the School identifies risks of actual or suspected child abuse or reportable conduct occurring in the school environment, it will make a written record of those risks and determine the action(s) it will take to reduce or remove the risks (risk controls).

The School will monitor and evaluate the effectiveness of the implementation of its risk controls, and update these where required.

The Principal and/or Board ensures (at least annually) that they and School staff undertake appropriate guidance and training about individual and collective obligations and responsibilities for managing the risk of child abuse and reportable conduct; child abuse and reportable conduct risks in the school environment; and the School's current child safety standards.

The School will ensure it creates, maintains and disposes of any records about student safety and wellbeing in line with the Public Record Office Victoria Recordkeeping Standards, including minimum retention periods regarding these obligations. In addition, the School will detail its information sharing and record-keeping processes and ensure all staff (including volunteers)



understand their relevant obligations.

### Student Protection Program

The commitments contained in this Policy are reflected in the School's Student Protection Program, which contains the framework to be followed by staff regarding student safety. This Student Protection and Safety Policy sits at the heart of the Student Protection Program, and underpins every other aspect of the School's student safety and wellbeing strategies, practices, policies and procedures.

The Student Protection Program is accessible to Board members and all staff electronically, and key aspects of the program (such as this Policy) are published on the School's website.

### Student Participation and Empowerment

The School recognises that a student safe culture is also contingent upon the participation and empowerment of students themselves.

Consistent with this understanding, the School will ensure:

- 1 That students are informed about all their rights, including to safety, information and participation (for example, those in the United Nations Convention on the Rights of the Child).
- 2 That the importance of friendships is recognised and support from peers is encouraged to help students feel safe and be less isolated.
- 3 Where relevant, that students are offered access to child abuse (including sexual abuse) and reportable conduct prevention programs and other relevant information in an age-appropriate way.
- 4 Staff are attuned to the signs of harm (including that caused by reportable conduct or child abuse) and facilitate student-friendly ways for students to express their views, participate in decision making and raise their concerns.
- 5 The School has strategies and curriculum planning documents in place to develop a culture that facilitates participation and is responsive to the input of students.
- 6 The School provides opportunities for students to participate and are responsive to their contributions, thereby strengthening confidence and engagement.

### Continual improvement

The School is committed to continual improvement that is responsive to emerging thinking, evidence and practice, so as to eliminate (where practicable) the possibility of student safety risks occurring in the first place. Where the School can improve, it will strive to do so.

The School will report on the outcomes of any relevant review to the School community.

## **Student Protection Responsibilities**

Society as a whole shares responsibility for promoting the safety and protection of students from abuse. In the School context, all members of the School community have a role to play.

However, specific responsibilities in respect of student safety are assigned to:

1. The Board
2. The Principal
3. The Executive Leadership Team
4. The School's Student Protection Officers
5. Staff
6. Students and parents

For further information, please refer to the Student Protection Responsibilities document (a copy of which is available on Complispace and the School's website).

### Student Protection Officers

Gippsland Grammar has appointed Student Protection Officers (**SPOs**) as a first point of contact to provide advice and support to students, parents, and staff regarding the safety and well-being of students at the School

The following SPOs may be contacted to provide advice and support:

Name	Position	Contact details
Michele Wakeham	Acting Principal	<a href="mailto:Michele.Wakeham@gippsland.vic.edu.au">Michele.Wakeham@gippsland.vic.edu.au</a> (03) 5143 6388
Kate Ray	Director of Strategic Operations and Innovation	<a href="mailto:Kate.ray@gippslandgs.vic.edu.au">Kate.ray@gippslandgs.vic.edu.au</a> (03) 5143 6388
Sam Gladman Liz Bullers	Garnsey Campus SPO	<a href="mailto:Sam.Gladman@gippslandgs.vic.edu.au">Sam.Gladman@gippslandgs.vic.edu.au</a> <a href="mailto:Liz.Bullers@gippslandgs.vic.edu.au">Liz.Bullers@gippslandgs.vic.edu.au</a> (03) 5143 6388
Libby Crowe	Bairnsdale Campus SPO	<a href="mailto:Libby.Crowe@gippslandgs.vic.edu.au">Libby.Crowe@gippslandgs.vic.edu.au</a> (03) 5153 9500
Lisa Goode	St Anne's Campus SPO	<a href="mailto:Lisa.Goode@gippslandgs.vic.edu.au">Lisa.Goode@gippslandgs.vic.edu.au</a> (03) 5143 7155 ELC – St Anne's

## Communication

This Policy is available to parents, students and the School community via the School's website.

This Policy is available to staff as part of the Student Protection Program. The Student Protection Program forms part of the School's induction program for incoming staff, and aspects of (and updates to) the Student Protection Program will be addressed in the School's professional development updates, training programs, bulletins and newsletters. Periodic training and refresher sessions on this policy are provided to all staff.

All staff must ensure that they abide by this policy and assist the School implementing this Policy.

## Authorisation and Evaluation

This Policy was authorised by the Principal and the Board in August 2022.

This policy and the School's student safe practices will be reviewed annually (or more frequently after a significant student safety incident) and implement improvements where applicable.

Families and the School community will be afforded the opportunity to contribute to the review and development of the School's student safety and wellbeing policies and practises (including this Policy).

## Related Policies

Student Protection Staff Code of Conduct

Student Protection Program Definitions

Student Protection Responsibilities

Make a Report Procedure

Version	Reviewed by	Authorised by	Approval Date	Effective Date	Sections modified
1	<i>Kate Ray</i>	Board of Directors	August 2022	August 2022	
2					