



PENINSULA

GRAMMAR

INSPIRING PERFORMANCE

CHILD PROTECTION AND SAFETY POLICY

Statement of Commitment to Child Safety

Peninsula Grammar is committed to providing a child safe and child friendly environment, where children and young people feel safe – physically, psychologically and culturally –and are able to actively participate in decisions that affect their lives.

At Peninsula Grammar we have a zero tolerance for child abuse and are committed to acting in children's best interests and keeping them safe from harm. The School regards its child protection responsibilities with the utmost importance and as such, is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations and maintain a child safe culture.

Aim of the Peninsula Grammar Child Protection and Safety Policy

Peninsula Grammar has developed the following policy as an overarching document that provides key elements of our approach to protecting children from abuse and reinforcing our zero tolerance for child abuse.

This policy forms the foundation of the School's procedures, practices, decision-making processes and ultimately the School's culture with respect to child safety.

The School's Child Protection and Safety Policy has been approved and endorsed by the School's Board of Directors and is reviewed on an annual basis or following any developments in Child Protection and Safety best practices or legislation

Content of the Peninsula Grammar Child Protection and Safety Policy

This policy includes, and ensures compliance, with:

- Ministerial Order 1359 (2022) – Managing the risk of Child Abuse in Schools (Vic) ("Child Safe Standards")
- Mandatory Reporting Obligations pursuant to the Child, Youth and Families Act 2005 (Vic)
- Reportable Conduct pursuant to the Child Wellbeing and Safety Act 2005 (Vic)
- Family Violence Information & Child Information Sharing Schemes

Definitions

'Child abuse' includes sexual offences, grooming, physical violence, serious emotional or psychological harm, serious neglect and a child's exposure to family violence. Peninsula Grammar is committed to the protection of all children from all forms of child abuse and demonstrates this commitment through the implementation of a comprehensive Child Protection Program designed to keep children safe.

Grooming refers to when a person engages in predatory conduct to prepare a child or young person for sexual activity at a later date. Grooming can include communicating and/or attempting to befriend or establish a relationship or other emotional connection with the child and/or their parent/carer.

Employee/Staff Member - For the purposes of the Child Wellbeing and Safety Act 2005 (Vic), 'employee' is defined as a person aged 18 years or over who is:

- Employed by the School whether or not that person is employed in connection with any work or activities of the School that relate to children; or



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- Engaged by the School to provide services, including as a volunteer, contractor, office holder or officer, whether or not the person provides services to children.

A minister of religion or a religious leader is also an employee.

Of relevance to the School, the following people are considered to be employees:

- Board of Directors.
- The Principal.
- Staff members.
- Direct Contact Volunteer (may have direct unsupervised contact with students).
- Indirect Contact Volunteers (involved in providing support whilst supervised)
- Sports Coaches.
- Third Party Contractors; and
- External Education Providers.

For the purposes of this policy, all of the above are referred to collectively as “staff” or “staff members”.

Child Safe Principles

The School's commitment to child safety is based on the following overarching principles that guide the development and regular review of our work systems, practices, policies and procedures to protect children from abuse.

1. All children have the right to be safe.
2. The welfare and best interests of the child are paramount.
3. The views of the child and a child's privacy must be respected.
4. Clear expectations for appropriate behaviour with children are established in our Child Safe Code of Conduct and Staff Policies that provide detailed guidance for all staff and volunteers on how to maintain professional boundaries between students and adults at Peninsula Grammar.
5. The safety of children is dependent upon the existence of a child-safe culture.
6. Child safety awareness is promoted and openly discussed within our School community.
7. Procedures are in place to screen all staff, volunteers and external education providers who have direct contact with children.
8. Child safety and protection is everyone's responsibility.
9. Child protection training is mandatory for all Staff. Delivery of training varies according to the type of staff member.
10. Procedures for responding to alleged or suspected incidents of child abuse are simple and accessible for all members of the School community.
11. Children from culturally or linguistically diverse backgrounds have the right to special care and support including those who identify as Aboriginal or Torres Strait Islander.
12. Children who have any kind of disability have the right to special care and support.

Peninsula Grammar Child Safe Code of Conduct

A Child Safe Code of Conduct lists behaviours that are acceptable and those that are unacceptable. It provides a high-level statement of professional boundaries, ethical behaviour, and acceptable and unacceptable relationships.

The Peninsula Grammar Child Safe Code of Conduct can be found on our website [here](#) as well as on the School's internal network.

All staff must provide agreement to behave in accordance with the Child Safe Code of Conduct before commencing work with Peninsula Grammar as part of their employment contract.



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Mandatory Reporting

Under the Child, Youth and Families Act 2005 (Vic), mandatory reporters must make a report to the Department of Families, Fairness and Housing if, while carrying out their duties, form a reasonable belief that a child is in need of protection from physical harm or sexual abuse.

Mandatory reporters are defined as:

- Teachers registered to teach or who have permission to teach pursuant to the Education and Training Reform Act 2006 (Vic).
- Early Childhood Workers.
- Principals of Government and Non-Government Schools.
- Registered Medical Practitioners.
- Nurses.
- School Counsellors.
- All members of the Police Force.
- People of Religious Ministry.

The School will adopt a three-phase approach with respect to Mandatory Reporting:

A. Education

Staff

To ensure that staff are aware of and understand their obligation under the Act the school undertakes annual Professional Development for staff relating to identifying child abuse, forming a belief that a child is at risk and mandatory reporting obligations and procedures upon induction and annually

With respect to students, Counselling staff will work to educate students on unacceptable behaviours towards them and encourage them to disclose unsafe behaviour to appropriate staff.

Student

The School has developed specific programs to educate students on appropriate behaviours and how to disclose unsafe and unacceptable behaviours towards them.

Community

This policy will be publicly available to ensure community awareness with respect to child abuse, its characteristics and the school's programs and response.

The School regularly engages with School Community stakeholders including the Peninsula Grammar Parents Association to ensure that there is a clear understanding of the School's position on Child Safety.

B. Intervention – Reporting Obligations & Procedures

1. Mandatory Reporting Legislation

- All mandatory reporters whom, in the course of carrying out their duties, form a reasonable belief that a child is in need of protection from physical harm or sexual abuse, and that the child's parents are unwilling or unable to protect the child, must report that belief to the Department of Families, Fairness and Housing, Child Protection Division as soon as possible after forming the belief.

In addition to the above requirement, it is expected that all mandatory reporters alert a member of the School Executive together with the Head of Wellbeing.



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-In the event that subsequent to an initial report a mandatory reporter becomes aware of further information that is relevant to their belief the child is at risk, they must make an additional report on each and every occasion.

-A 'reasonable belief' is more than mere rumour or speculation but may be less than having proof. The mandatory reporter must assess whether, if provided with the same information, a reasonable person would form a belief the child is at risk.

2. Criminal Offences – Failure to disclose, failure to protect & grooming offences

Any staff member who forms a reasonable belief that:

- a sexual offence has been committed by an adult against a child;
- an adult associated with the School poses a risk of sexual abuse to a student; and/or
- a child is subject to predatory or "grooming" behaviour;

must disclose that information to police. Failure to disclose the information to the Police, or protect a student from the risk of sexual abuse is a Criminal Offence and applies to all adults in Victoria.

3. Specific Requirements of Peninsula Grammar

-In the event there is a life-threatening danger to a student, Staff are to contact Triple Zero (000) and call the School's Emergency Number 666 (9788 7666)

- Staff are to keep records of all concerns regarding Student Wellbeing and to inform the Principal and/or the Head of Wellbeing when they believe a student is at risk, however their mandatory reporting obligation is not discharged by providing this information internally

- Staff must not make a promise to a student to withhold information from relevant persons, including Department of Families, Fairness and Housing and Police, if a student makes a disclosure to them.

C. Post Incident Review

-School Executive will undertake a review of staff responses to specific incidents to ensure best practice and compliance with the policy, including seeking guidance, where available, from appropriate authorities and any recommendations they may have. All staff and students involved will be offered ongoing support (see 'Support for Affected Students')

-The Legislative Policy Coordinator will undertake a review of this policy to ensure it remains best practice.

Reportable Conduct

The School is required to investigate and report to the Commission for Children and Young People (Commission) any and all allegations of staff reportable conduct or misconduct that may involve reportable conduct.

Reportable conduct is defined in the Act to include:

- A sexual offence committed against, with or in the presence of, a child;
- Sexual misconduct committed against, with or in the presence of, a child;
- Physical violence committed against, with or in the presence of, a child;
- Any behaviour that causes significant emotional or psychological harm to a child; or
- Significant neglect of a child.



“Sexual misconduct” includes:

- Behaviour, physical contact or speech or other communication of a sexual nature, for example ‘sexting’;
- Inappropriate touching or physical contact;
- Grooming behaviour; and
- Voyeurism.

“Sexual offence” for the purposes of the Reportable Conduct Scheme means a serious sexual offence as set out in clause 1 of Schedule 1 of the *Sentencing Act 1991 (Vic)*, which includes rape, attempted rape, sexual assault, incest, indecent act with a child, persistent sexual abuse of a child, grooming and the production or possession of child pornography.

“Significant” means in relation to emotional or psychological harm or neglect, that the harm is more than trivial or insignificant, but need not be as high as serious and need not have a lasting permanent effect.

The threshold for reporting allegations of reportable conduct is a ‘reasonable belief’, which is much lower than these other reporting obligations. The Commission states that reasonable belief is more than suspicion. There must be some objective basis for the belief, however, it is not the same as proof, and certainty is not required.

Where a reasonable belief is formed the School must notify the Commission. It is the School’s policy that notification be made by The Principal and/or the Head of Wellbeing and/or their delegates.

Where there is an allegation of criminal conduct, including physical violence, significant emotional or psychological abuse, sexual offences and significant neglect must be reported to the Victorian Police as the first priority.

Child Protections & Safety Officers

Peninsula Grammar has appointed Suzanne Penhall , Head of Respectful Relationships as the School’s Senior Child Protection and Safety Officer. The Senior Child Protection Officer has an important role in the promotion and maintenance of our child protection culture at the School. Reporting directly to the Principal, the School’s Senior Child Protection and Safety Officer must provide timely reports on any Child Protection concerns.

The Senior Child Protection Officer is contactable by phone on 9788 7848 or by emailing spenhall@pgs.vic.edu.au.

In addition to the Senior Child Protection and Safety Officer Peninsula Grammar has appointed the people listed below as the School’s Child Protection Officers. Each Child Protection Officer is available to answer any questions that you may have with respect to our Child Protection and Safety Policy and associated programs.

Please note that reporting the matter to one of our Child Protection and Safety Officers does not release you from other legal and regulatory reporting obligations you may have.

Whenever there are concerns that a child is in immediate danger, the Police should be contacted on 000.

| SCHOOL CHILD PROTECTION OFFICERS – 2021 | | | |
|---|----------------------------------|------------|--|
| NAME | POSITION | CONTACT No | EMAIL |
| Suzanne Penhall | Head of Respectful Relationships | 9788 7848 | spenhall@pgs.vic.edu.au |
| Anne Stringer | Head of Wellbeing | 9788 7823 | astringer@pgs.vic.edu |



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|------------------------|---|-----------|--|
| Louise Nicholls-Easley | Head of Junior Years | 9788 7831 | lnichollseasley@pgs.vic.edu.au |
| Dominic Linossier | Head of Middle School Head of Year 9 | 9788 7867 | dlinossier@pgs.vic.edu.au |
| Anne-Lise Haugen | Head of Senior School | 9788 7647 | ahaugan@pgs.vic.edu.au |
| Kristen Beagley | Director of Boarding | 9788 7798 | kbeagley@pgs.vic.edu.au |

Support of Affected Students

Ensuring a student feels safe and supported following an incident is of paramount importance to the School. In addition to immediate contact with our Student Wellbeing team, the School will also work closely with the student, parents, carers or guardians to determine any additional support services that may be available to provide appropriate support.

Whilst each matter will be dealt with on a case-by-case basis to ensure the student is provided with support they require as an individual, such action may include:

- Referral to School Counselling services.
- Referral to external agencies.
- Family Counselling.
- Academic Support.
- Referral to culturally and/or linguistically diverse support services.

Employment Practices

Peninsula Grammar has strict recruitment and selection procedures for all potential staff members to ensure we take all reasonable steps to employ staff suitable for child related work. The School's practices include, but are not limited to:

- Seeking a declaration from individuals confirming:
 - o They have not been subject to any investigation or disciplinary procedures with respect to their suitability to work with children.
 - o They have never been in breach of another organisation's child/vulnerable persons protection policies.
 - o They have never had concerns raised about their behaviour towards children or vulnerable persons; and
 - o They have not been subject to investigation of or conviction of a criminal offence relating to children or vulnerable persons.
- Requirement of two references who are specifically questioned regarding a potential staff members suitability to work with children.
- Proof of a valid Working with Children Check, which is reviewed by the School for currency.
- Acknowledgement and understanding of the School's commitment to Child Safety; and
- Specific questioning regarding their suitability to work with children during the application and/or interview process.

This policy, together with Our Child Safe Code of Conduct and Internal staff policies, outlines expected standards of behaviour of staff members at the School when interacting with children and young people. Conduct which breaches these policies will constitute reportable conduct under this policy. Where staff are under investigation for breach of this policy, or for any reason that would question their suitability to



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work with children, they will be immediately stood down until such time as a thorough investigation can be completed.

Family Violence information & child information sharing scheme

The Victorian Governments Family Violence Information Sharing Scheme ('FVISS') and Child Information Sharing Scheme ('CISS') enable the sharing of confidential information with respect to Children when they meet a relevant threshold.

For information pertaining to the FVISS and/or CISS please see our Privacy Policy available [here](#).

Responsibilities

Child protection is everyone's responsibility. At Peninsula Grammar all Board Directors and staff (as defined within the policy), have a shared responsibility for contributing to the safety and protection of children. Specific responsibilities include:

- **Board of Directors:** to ensure that appropriate resources are made available to allow the School's Child Protection and Safety Policy and the Child Protection Program to be effectively implemented within the School and are responsible for holding the Principal and Leadership Team accountable for effective implementation.
- **The Principal:** is responsible, and will be accountable for taking all practical measures to ensure that this Child Protection and Safety Policy and the School's Child Protection Program are implemented effectively and that a strong and sustainable child protection culture is maintained within the School.
- **Staff Members:** must be familiar with the content of our Child Protection and Safety Policy, our Child Protection Program and their legal obligations with respect to the reporting of child abuse. It is each individual's responsibility to be aware of key risk indicators of child abuse, to be observant, and to raise any concerns they may have relating to child abuse with one of the School's Child Protection and Safety Officers.

Review

Peninsula Grammar is committed to the continuous improvement of our Child Protection Program. The Program is regularly reviewed for overall effectiveness and to ensure compliance with all child protection related laws, regulations and standards.

Peninsula Grammars' Child Protection and Safety Policy is to be reviewed, approved and endorsed by the School's Board of Directors annually.

Last review August 2022.

Review is to be undertaken prior to August 2023.