

Peninsula Grammar School

Child Safety and Wellbeing Policy

1. Introduction

Peninsula Grammar School (the **school** or **PGS**) is a child safe organisation which welcomes all children, young people and their families. The school is committed to providing environments where our 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. The school's child safe policies and practices are inclusive of the needs of all children and students.

With a zero-tolerance stance on child abuse, the school is committed to act in children's best interests and keeping them safe from harm. It treats child protection responsibilities with utmost importance and is committed to comply with relevant child protection laws and standards to create a child safe environment.

Purpose

This policy sets out the school's commitment to be a child safe and child-friendly organisation, in accordance with *Ministerial Order 1359*, which sets out how the Victorian Child Safe Standards apply in school environments. It includes mandatory reporting obligations pursuant to the *Child, Youth and Families Act 2005 (Vic)* and reportable conduct obligations pursuant to the *Child Wellbeing and Safety Act 2005 (Vic)*.

This policy informs the school community of its obligations to act safely and appropriately towards children, to support a positive child safety and wellbeing environment and culture.

2. Scope

This policy applies to:

- all school staff, volunteers and contractors whether they work in direct contact with students
- all physical and online school environments used by students during or outside of school hours, including other locations for school programs and activities
- the school's boarding premises and boarding environments.

3. Commitments to child safety

- Child safety is a shared responsibility. Each person at the school has an important role to promote child safety and wellbeing, and to promptly raise issues or concerns about a child's safety
- The school has no tolerance for child abuse and takes proactive steps to identify and manage any risks of harm to students its environments. When a child safety concern is raised or identified, it is treated seriously and responded promptly and thoroughly
- The school promotes positive relationships between students and adults and between students and their peers. These relationships are based on trust and respect
- Particular attention is given to the child safety needs of Aboriginal and Torres Strait Islander students, those from culturally and linguistically diverse backgrounds, international students, students with disabilities, those unable to live at home, children and young people who identify as

lesbian, gay, bisexual, trans and gender diverse, intersex and queer (LGBTIQ+) and other students experiencing risk or vulnerability. Inappropriate or harmful behaviour targeting students based on these or other characteristics, such as racism or homophobia, are not tolerated at the school, and any instances identified will be addressed with appropriate consequences

4. International students

Specific child safety requirements apply for international students. The school must notify the Victorian Regulation and Qualifications Authority (VRQA) if an alleged abuse relates to an international student and where the school has issued a Confirmation of Appropriate Accommodation and Welfare (**CAAW**) letter to that student, to undertake responsibility for approving their student's accommodation, support and general welfare.

The school retains a legal obligation for international students even when they are not in the direct care of the school and monitoring and reporting procedures exists to support these students in all settings (school holiday periods, homestay etc.).

5. Victorian Child Safety Standards

The school is committed to upholding the Victorian Child Safe Standards, in line with *Ministerial Order 1359* and recognise the eleven Child Safe Standards to be:

Standard 1	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
Standard 2	Child safety and wellbeing is embedded in organisational leadership, governance and culture
Standard 3	Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously
Standard 4	Families and communities are informed, and involved in promoting child safety and wellbeing
Standard 5	Equity is upheld and diverse needs respected in Policy and practice
Standard 6	People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice
Standard 7	Processes for complaints and concerns are child focused
Standard 8	Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training
Standard 9	Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed
Standard 10	Implementation of the Child Safe Standards (i.e., the Victorian Standards) is regularly reviewed and improved
Standard 11	Policies and procedures document how the organisation is safe for children and young people

6. Roles and Responsibilities

Board of Directors

The Board of Directors are responsible for ensuring that the school's governance arrangements support and prioritise a child safe culture and promotes the cultural safety and wellbeing of children.

They are also responsible for ensuring the school has appropriate resources to implement this policy and related procedures, and to hold the Principal accountable for its implementation.

Principal

The Principal is responsible for taking practical measures to ensure that the school's *Child Safety and Wellbeing Policy* and *Child Safe Code of Conduct* are implemented effectively to promote and maintain a strong and sustainable child-safe culture.

Child Safety and Wellbeing Officers

Child Safety and Wellbeing Officers are appointed by the school to be the first point of contact to raise child safety and wellbeing questions or concerns. These Officers receive additional training with respect to child safety and wellbeing issues and assist the Principal and School Executive to ensure an appropriate response.

Senior Child Safety and Wellbeing Officers have an important role to promote and maintain a positive child protection culture at the school.

Senior Child Protection Officer is the first point of contact for child abuse concerns and queries and assists the Principal to coordinate appropriate responses to child abuse incidents which may include liaising with the Police and other external agencies and responding to a child who makes, or is affected by, an allegation of child abuse.

Child Safety and Wellbeing Officers		
Louise Nicholls-Easley	Head of Junior School	9788 7831 lnichollseasley@pgs.vic.edu.au
Dominic Linossier	Head of Middle School	9788 7867 dlinossier@pgs.vic.edu.au
Greg Kennedy	Head of Pre-Senior	9788 7769 gkennedy@pgs.vic.edu.au
Anne-Lise Haugen	Head of Senior School	9788 7647 ahaugen@pgs.vic.edu.au
Senior Child Safety and Wellbeing Officers		
Suzanne Penhall	Head of Respectful Relationships	9788 7848 spenhall@pgs.vic.edu.au
Anne Stringer	Head of Wellbeing	9788 7823 astringer@pgs.vic.edu.au
Senior Child Protection Officer		
Steven Church	Executive Deputy Principal	schurch@pgs.vic.edu.au

School Executive

The School Executive is responsible for ensuring that a strong child safe culture is created and maintained, and that school policies and practices are effectively developed and implemented in accordance with *Ministerial Order 1359*. This includes reinforcing high standards of respectful behaviour between children and adults, between children, and to promote discussion on child safety issues across the school community including at leadership and staff meetings.

All Staff

All staff will:

- Participate in child safety and wellbeing training and always follow the school's child safety and wellbeing policies and procedures
- Act in accordance with the school's child safety policies, code of conduct and procedures
- Be aware of key risk indicators of child abuse, and act on any concerns relating to child protection with one of the School's Child Safety Officers or a member of the School Executive
- Report child abuse in accordance with their mandatory reporting obligations
- Ensure children's and young people's views are taken seriously and their voices are heard about decisions that affect their lives;
- Follow any reasonable direction given by a management representative of the school in the interest of protecting the safety and wellbeing of its students and
- Implement inclusive practices that respond to the diverse needs of children and young people

Volunteers and contractors

Volunteers and contractors are required to be familiar with the school's Child Safety and Wellbeing Policies, and their legal obligations with respect to the reporting of child abuse. They have a responsibility to be aware of key risk indicators of child abuse, their legal obligation for mandatory reporting, and to raise any concerns they may have relating to child abuse with a school representative for appropriate management action.

7. Child Safety Code of Conduct

The school's Child Safety Code of Conduct (**Code of Conduct**) sets the boundaries and expectations for appropriate behaviours between adults and students. It also clarifies behaviours that are not acceptable across the school's physical and online environments.

Students are made clear about what to expect from adults in the school, and how to report inappropriate behaviour.

This Code of Conduct is accessible at the school website and internal network (Zenith).

8. 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 needs protection from physical harm or sexual abuse.

Principals, registered teachers, early childcare workers, registered medical practitioners, nurses, registered psychologists, school counsellors, people of religious ministry and all members of the police force are mandatory reporters under the *Child, Youth and Families Act 2005 (Vic)*.

It is the responsibility of staff, volunteers or members of the school community to check whether they are mandatory reporters under the legislation.

All mandatory reporters must make a report to the *Department of Families, Fairness and Housing* as soon as practicable, if, while carrying out their professional roles and responsibilities, they form a reasonable belief that:

- a child has suffered, or is likely to suffer, significant harm because of physical abuse and/or sexual abuse and
- the child's parents have not protected, or are unlikely to protect, the child from harm of that type.

The school places focus on education, intervention and reporting and post-incident review to best support its staff to meet their mandatory reporting obligations.

Education

Staff

The school conducts annual child safety training about staff obligations under the Act, how to identify child abuse, mandatory reporting obligations and procedures.

The school will educate students on unacceptable behaviours towards them and encourage them to disclose unsafe behaviour to appropriate staff.

Student

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

Community

This policy is publicly available to ensure the community is aware of the school's commitment and management of child safety and wellbeing. The school engages with key school stakeholders including students, staff, the Peninsula Grammar Parents Association and OPGA to ensure all are clear about the school's position on child safety and wellbeing.

Intervention – Reporting Obligations and Procedures

1. Mandatory Reporting Legislation

All mandatory reporters whom, while carrying out their duties, form a reasonable belief that a child needs 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.

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

A staff member must disclose information to police, where they 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

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.

Reporting obligations and procedures are outlined in the *School's Child Safety Reporting Procedure*, which is located on Zenith (internal staff platform).

Post-incident review

A post-incident review will be conducted by a member of the School Executive to ensure best practice and compliance with the policy. This may include seeking guidance and recommendations, where available, from appropriate authorities.

9. Reportable Conduct

The school is required to investigate and report to the *Commission for Children and Young People* (the **Commission**) 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 (even prior to criminal proceedings commencing), sexual misconduct or physical violence committed against, with or in the presence of a child
- sexual misconduct committed, with or in the presence of a child
- behaviour causing significant emotional or physical harm to a child
- significant neglect of a child or
- misconduct involving any of the above.

“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. There must be some objective basis for the belief, however, it is not the same as proof, and certainty is not required.

Reportable conduct reporting obligations and requirements are outlined in the school’s *Child Safety Reporting Procedure*, located on the school’s internal network (Zenith).

10. Support of affected students

It is important for a student to feel safe and supported following an incident. In addition to immediate contact with the school’s Wellbeing team, appropriate support is also available to the affected student/s, parents, carers or guardians.

Individual support to affected student/s may include, but are not limited to:

- Referral to school counselling services
- Referral to external agencies
- Family counselling
- Academic support
- Referral to culturally and/or linguistically diverse support services.

11. 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. This information is managed in line with the school’s Privacy Policy.

12. Managing risks to child safety and wellbeing

The school identifies, assesses and manages risks to child safety and wellbeing in across its physical and online environments in accordance with school policies, procedures and practices. This applies to off-site school activities including camps, adventure activities and the facilities and services engaged through third party providers for student use.

A Risk Register is used to record any identified risks related to child abuse alongside actions in place to manage those risks. The Senior Executive will monitor and evaluate the effectiveness of its Risk Register annually.

13. Establishing a culturally safe environment

The school is committed to establishing an inclusive and culturally safe school where the strengths of Aboriginal culture, values and practices are respected, and how every student can have a positive experience in a safe environment. For Aboriginal students, the school recognises the link between Aboriginal culture, identity and safety and actively create opportunities for Aboriginal students and the Aboriginal community to have a voice and presence in our school planning, policies, and activities.

14. Student empowerment

The school encourages students and families to contribute to its child safety approach to support their understanding of their rights and their responsibilities.

Respectful relationships between students are reinforced and the school encourages strong friendships and peer support at school to cultivate positive a sense of belonging. The school's expectations are outlined in its values, policies and *Behavioural Expectations Framework*.

The school informs students of their rights, and provides them knowledge and skills to recognise unsafe situations with adults or other students, and to act on concerns relating to themselves or their peers. Students know who to talk to if they are worried or feeling unsafe and are encouraged to share concerns with a trusted adult at any time. Students and families can access information on how to report concerns by contacting their Head of School.

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

15. Family engagement

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

To support family engagement, the school provides families and school community access to information about our child safe policies and practices and involving them in our approach to child safety and wellbeing.

16. Diversity and equity

The school celebrates the diversity of its community and promote respectful environments that are free from discrimination. Our focus is on wellbeing and growth for all. The school recognises that each child has unique skills, strengths and experiences.

The school supports individuals and groups of children and young people in our community with additional and specific needs. This includes tailoring child safety supports to the needs of:

- Aboriginal and Torres Strait Islander children and young people
- children from culturally and linguistically diverse backgrounds
- children and young people with disabilities
- children unable to live at home or impacted by family violence
- international students
- children and young people who identify as LGBTIQ+

17. Suitable staff and volunteers

The school's policies sets clear standards of behaviour for staff members, contractors and visitors, with respect to interacting with children and young people. Conduct which breaches these policies are reportable conduct under this policy.

The school applies robust child safe recruitment, induction, training, and supervision practices to ensure that all staff, contractors, and volunteers understand their child safety obligations, and are suitable to work with children.

All volunteers and contractors are required to comply with our *Child Safety and Wellbeing Policy* and *Working with Children Check Policy*. The extent of child safety training and supervision is dependent on their role and extent of interaction with students and children.

18. Staff training

Staff are required to participate in our child safety and wellbeing training, which includes:

- Being familiar with this policy, the *Child Safe Code of Conduct*, the *Staff and Student Professional Boundaries Policy* and procedures for responding to and reporting suspected child abuse (including Mandatory Reporting)
- Understand how to access School policies and procedures
- Where to get support and assistance for Child Safety and Wellbeing matters

The school will conduct training for staff upon commencement of employment, and on an annual basis to reinforce the expectations and requirements to comply with its child safety policies.

19. Complaints

The school fosters a culture that encourages and expects staff, volunteers, students, parents, and the school community to raise concerns and complaints, as set out by the school's *Complaints Resolution Policy*.

The school will act on an incident, disclosure, allegation or suspicion of an offence, in accordance with the process set out by school policies.

20. Policy breach

Where a person is under investigation for breach of this policy, or for any reason that would question their suitability to work with children, the school will issue directions to ensure the safety and wellbeing of affected children. This may include being stood down and/or removal from school premises, pending an investigation.

For staff, a breach of this policy could constitute as serious misconduct and result in disciplinary action, up to and including termination or employment.

21. Review

This policy will be reviewed in line with legislative requirements or every two years, whichever comes first. The school will assess complaints, concerns and incidents to improve our policy and practices.

22. Further Information

Questions or further information about this policy should be directed to the Principal.

23. Definitions

The following terms within this policy have specific definitions:

Term	Meaning
Child	a child or young person who is under the age of 18.
Child safety	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
Child abuse	Includes: (a) Any act committed against a child involving a sexual offence and/or grooming offences under section 49m(1) of the Crimes Act 1958 (b) The infliction, on a child, of physical violence and/or serious emotional or psychological harm (c) The serious neglect of a child including exposure to family violence
Child-connected work	means work authorised by the School Council and performed by an adult in a school environment while children are present or reasonably expected to be present
Contractor	A contracted service provider (whether or not a body corporate or any other person is an intermediary) engaged by the School to perform child-related work.
School environment	Any of the following physical, online or virtual places, used during or outside school hours: (a) The School premises including its boarding premises (b) 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) (c) Other locations provided by the school 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 or another school and sporting events, excursions, competitions other events.
Staff	a person who is directly employed by the School
Student	a person who is enrolled at or attends the School.
Volunteer	a person who performs work without remuneration or reward for the School in the School environment

Relevant references and documents

Ministerial Order 1359
 Child Wellbeing and Safety Act 2005
 Child, Youth and Families Act 2005 (Vic)
 Worker Screening Act 2020
 Peninsula Grammar School – Child Safe Code of Conduct
 Peninsula Grammar School – Child Safety Reporting Procedure
 Peninsula Grammar School – Staff and Student Professional Boundaries Policy
 Peninsula Grammar School – Student Supervision Policy
 Peninsula Grammar School – Diversity and Inclusion Policy
 Peninsula Grammar School – Working with Children Check Policy
 Peninsula Grammar School – Bullying Prevention and Intervention Policy
 Peninsula Grammar School – Behavioural Expectations Framework

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