

Xavier College

Child Safe Policy



1. BACKGROUND

Xavier College Limited (the 'College') has developed the following Child Safe Policy (the 'Policy'). This Policy provides key elements of the College's approach to protecting children from abuse. The Policy forms the foundation of the College's procedures, practices, decision-making processes and ultimately the College's culture with respect to child safety, protection and care.

This Policy is designed to be published on the College's public website, referenced in other mediums, as appropriate, and used in the induction of College Board members, all new staff, volunteers and third party and educational service providers.

2. PURPOSE

This Policy provides the framework for:

- The development of work systems, practices, procedures and guidelines that promote child safety within the College
- The creation of a positive and robust child safety culture
- The promotion and open discussion of child safety issues within the College; and
- Compliance with all laws, regulations and standards relevant to child safety and protection in Victoria, most especially Ministerial Order 870.

3. STATEMENT OF COMMITMENT

The College has **zero tolerance** for child abuse and is committed to acting in children's best interests and keeping them safe from harm. The College regards its child safety responsibilities with the utmost importance. It is committed to providing the necessary resources to ensure compliance with all relevant child safety and protection laws and regulations and to uphold a child safe culture at all times.

Child abuse includes sexual offences, grooming, physical violence, serious emotional or psychological harm, serious neglect and a child's exposure to family violence.

The College 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 Safety Program designed to keep children safe. Further, students at the College, through our actions, processes and support, are empowered to have voice and to take action for their own care.

4. SCOPE

This Policy applies to all College employees (partners in mission), Jesuits, directors, students, parents and guardians, third party service providers, volunteers and contractors involved in the College environment.

5. POLICY STATEMENT

5.1 Child Safe Standards

The College recognises its responsibilities, as an organisation that provides services to children, to implement and uphold the Child Safe Standards that are upheld by Victoria's Commission for Children and Young People (CCYP).

Further, the College recognises and affirms the seven (7) Child Safe Standards:

- Standard 1: Governance and leadership
- Standard 2: Clear commitment to child safety
- Standard 3: Code of Conduct
- Standard 4: Human resource practices
- Standard 5: Responding and reporting
- Standard 6: Risk management and mitigation; and
- Standard 7: Empowering children.

5.2 Child Safety Code of Conduct

The College's Code of Conduct for child safety is captured in the College Code of Conduct as established and prescribed by the Australian Province of the Society of Jesus (the 'Province').

Both the Province and the College are committed to creating and maintaining environments that are safe, positive, enriching and supportive and which promote religious, educational, social, physical, professional and emotional development. All who are involved in the work of the Province and the College are deeply committed to safeguarding all people, particularly children.

The first of four primary obligations within the Code of Conduct, with respect to professional and personal conduct, addresses 'Safeguarding Children' and a duty and responsibility to promote and maintain a Child Safe environment and culture that cares for all persons.

5.3 Roles and Responsibilities

Child safety is everyone's responsibility.

All members of the College community, as noted within the Scope, have a shared responsibility for contributing to the safety and protection of children.

Specific responsibilities in this regard include:

5.3.1 College Board

Each member of the College Board is required to ensure that appropriate resources are made available to allow the College's Child Safe Policy and the Child Safety Program to be effectively implemented within the College and are responsible for holding the Principal and the management team accountable for effective implementation.

5.3.2 The Principal

The Principal is responsible, and will be accountable for, taking all practical measures to ensure that this Policy and the College's Child Safety Program are implemented effectively and that a strong and sustainable child safety culture is maintained within the College.

5.3.3 The College Child Safety Leads

A number of key staff members are nominated as the College's Child Safety Leads. Child Safety Leads receive additional specialised training with respect to child safety issues. They are the first point of contact for raising child safety concerns within the College. They are also responsible for championing child safety and protection within the College and assisting in co-ordinating responses to child safety incidents.

5.3.4 Staff Members

All staff are required to be familiar with the content of this Policy and the College's Child Safety Program and their legal obligations with respect to reporting 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 College's Child Safety Leads.

5.3.5 Direct Contact Volunteers

All Direct Contact Volunteers, as defined in this Policy, are required to be familiar with the content of this Policy, the College's Child Safety 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 College's Child Safety Leads.

5.3.6 Indirect Contact Volunteers

Indirect Contact Volunteers (or 'Indirect Volunteers') are those volunteers who are involved in providing support and services whilst not directly assisting a specific group of students. Examples of Indirect Contact Volunteer activities may include assisting with College administrative, operational and support functions and events.

All Indirect Volunteers are responsible for contributing to the safety and protection of children in the College environment.

All Indirect Volunteers are required by the College to be familiar with this Policy and the College's Child Safety Program.

5.3.7 Third Party Contractors

All Third Party Contractors (service providers) engaged by the College are responsible for contributing to the safety and protection of children within the College environment. Third Party Contractors include, but are not limited to, maintenance and building personnel, consultants, casual teachers, tutors, sports coaches and College cleaners.

This also includes music teachers and other extra-curricular teachers and instructors who are engaged by students and their families directly, rather than the College, but who have an agreement to use the College's facilities.

5.3.8 Direct Contact Contractors

Direct Contact Contractors are:

- Those who have direct contact[^] with students during the normal course of their work
- Those who may be in a position to establish a relationship of trust with a student notwithstanding that unsupervised access to students would be rare (for example full-time maintenance personnel); and
- Any contractors whom the College is legally required to screen.

[^]The Working with Children Act 2005 (Vic) defines 'direct contact' as any contact between a person and a child, aged under 18, that involves:

- Physical contact; or
- Face-to-face contact; or
- Contact by post or other written communication; or
- Contact by telephone or other oral communication; or
- Contact by email or other electronic communication.

5.3.9 Indirect Contact Contractors

Indirect Contact Contractors are those contractors who do not meet the definition of "Direct Contact Contractor". Refer to Third Party Contractors' responsibilities for more information.

All service providers engaged by the College are required by the College to be familiar with this Policy and the College's Child Safety Program.

The College may include this requirement in the written agreement between it and the service provider.

5.3.10 External Education Providers

An External Education Provider is any organisation that the College has arranged to deliver a specified course of study that is part of the curriculum, to a student or students enrolled at the College. The delivery of such a course may take place on the College's premises or elsewhere.

All External Education Providers engaged by the College are responsible for contributing to the safety and protection of children in the College environment.

All External Education Providers engaged by the College are required by the College to be familiar with this Policy and the College's Child Safety Program.

The College may include this requirement in the written agreement between it and the External Education Provider.

5.4 Child Safety Values and Principles

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

- All children have the right to be safe.
- The welfare and best interests of the child are paramount.
- The views of the child and a child's privacy must be respected.
- Clear expectations for appropriate behaviour with children are established in the College's (Jesuit Province) Code of Conduct and Staff and Student Professional Boundaries Policy.
- The safety of children is dependent upon the existence of a child safe culture.
- Child safety awareness is promoted and openly discussed within the College community.
- Procedures are in place to screen all staff, Direct Contact Volunteers, Third Party Contractors and External Education Providers who have direct contact with children.
- Child safety and protection is everyone's responsibility.
- Child protection training is mandatory for all College Board members, staff and Direct Contact Volunteers.
- Procedures for responding to alleged or suspected incidents of child abuse are simple and accessible for all members of the College community.
- 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.
- Children who have any kind of disability have the right to special care and support.

5.5 Child Safety Program

The College is committed to the effective implementation of its Child Safety Program and ensuring that it is appropriately reviewed and updated. The College has adopted a risk management approach by identifying key risk indicators and assessing child safety risks based on a range of factors including the nature of the College's activities, physical and online environments and the characteristics of the student body.

The College's Child Safety Program relates to all aspects of protecting children from abuse and establishes work systems, practices, policies and procedures to protect children from abuse. It includes:

- Clear information as to what constitutes child abuse and associated key risk indicators
- Clear procedures for responding to and reporting allegations of child abuse (as relates to Standard 5 of the Child Safe Standards and referenced in the College 'Guidelines for Responding to and Reporting Allegations of Child Abuse')
- Strategies to support, encourage and enable all staff, Volunteers, Third Party Contractors, External Education Providers, parents and students to understand, identify, discuss and report child protection matters
- Procedures for recruiting and screening College Board members, all staff and Direct Contact Volunteers (as relates to Standard 4 of the Child Safe Standards)
- Procedures for reporting Reportable Conduct and/or misconduct
- Procedures for mandatory reporting (as referenced in the College 'Procedures for Mandatory Reporting')
- Pastoral care strategies designed to empower students, to promote student voice and agency, and to keep them safe (as relates to Standard 7 of the Child Safe Standards and referenced in the College 'Guidelines for the Participation and Empowerment of Students')
- Policies with respect to the safety of Aboriginal student, students who are linguistically or culturally diverse and students with disabilities
- A child safety training program
- Information regarding the steps to take after a disclosure of abuse to protect, support and assist children
- Guidelines with respect to record keeping and confidentiality
- Policies to ensure compliance with all relevant laws, regulations and standards (including the Victorian Child Safe Standards); and
- A system for continuous review and improvement.

As a part of the College's induction process, all staff and Direct Contact Volunteers are required to complete a selection of training modules on the content of the College's Child Safety Program, including but not limited to the College Code of

Conduct, with further training through the Australian Childhood Foundation.

All staff, Direct Contact Volunteers and College Board members are provided with additional, ongoing child safety training. This should be conducted annually.

Staff, Volunteers, Third Party Contractors and External Education Providers are supported and supervised by the College's Child Safety Leads to ensure that they are compliant with the College's approach to child safety and protection.

5.6 Reporting Child Safety Concerns

The College's Child Safety Program provides detailed guidance for members of the College Board, all staff and Direct Contact Volunteers as to how to identify key risk indicators of child abuse and how to report child abuse concerns to one of the College's nominated Child Safety Leads. It also contains detailed procedures with respect to the reporting of child abuse incidents to relevant authorities.

Staff, Third Party Contractors, External Education Providers, Volunteers, students, parents/guardians and other community members who have concerns that a child may be subject to abuse or grooming are asked to contact one of the relevant Child Safety Leads on the relevant campus.

All communications will be treated confidentially.

The Child Safety Leads and their relevant contact details across the three College campuses are clearly outlined on the College website and associated College contact information.

6. RELATED POLICES, PROCEDURES AND DOCUMENTS

- Student Care Policy
- Creating and Maintaining a Child Safety Environment Policy
- Participation and Empowerment of Children Policy
- Staff and Student Professional Boundaries Policy
- Mandatory Reporting Policy
- Responding to and Reporting Allegations of Child Abuse and Student Sexual Offending Policy
- College (Jesuit Province) Code of Conduct

7. BREACHES OF THIS POLICY

If you believe that the College has breached its obligations, please contact the Principal by writing or telephone. The College will investigate your notification and will inform you of the outcome as soon as is practicable after a decision has been made.

The College Principal can be contacted on:

- Telephone: (03) 9854 5411
- In Writing: The Principal, Xavier College, 135 Barkers Road KEW, VIC 3101
- Email: principal@xavier.vic.edu.au

Alternatively, the Director of Professional Standards at the Australian Province at the Society of Jesus (Jesuits) can be contacted on:

- Telephone: (03) 9810 7300
- In Writing: Director of Professional Standards, PO Box 6071, HAWTHORN, VIC 3122
- Email: professionalstandards@sjasl.org.au

Certain incidents might be covered by the College's Whistleblower Policy which can be found [here](#).

The Principal is responsible for ensuring that all breaches of this Policy and underlying policies, guidelines and procedures are escalated to the Risk and Compliance Committee as soon as possible.

A breach of this Policy may lead to disciplinary action including possible termination of employment or appointment and/or referral to the appropriate authorities.

8. FURTHER INFORMATION

If you would like further information about the way the College manages its Child Safety commitments, the first point of contact is to the relevant Director of Campus or Child Safety Lead.

POLICY RATIFICATION AND REVIEW:

The College's policies are ratified by the Xavier College Limited Board. This Policy will be reviewed on a three-year basis or earlier if required.