

Child Safeguarding Policy



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1. CONTEXT

Saint Ignatius' College Riverview (the College) is a Catholic, Jesuit boarding school for boys from Year 5 to Year 12. Situated on the beautiful Lane Cove River in Sydney NSW, it has an enrolment of over 1600 students. The College is conducted by the Society of Jesus and is part of a worldwide network of Jesuit schools and universities.

Established in 1880, the College is committed to an education for each student that proposes Christ as the model for human life by promoting the spiritual, academic, social, physical and experiential growth of its students.

The educational program at the College is dedicated to the holistic formation of the human person and does so through the pursuit of 'human excellence'. We seek to form, in companionship with parents, young men who are highly competent, committed, compassionate and with a developed conscience. We seek to form young men who are for and with others.

The purpose of the College policies and procedures is to provide a framework which ensures that the safety, individual care (*cura personalis*) and dignity of each person is paramount.

2. OUR COMMITMENT

Saint Ignatius' College Riverview is a Catholic boys' boarding school in the Jesuit tradition dedicated to the spiritual, academic, social, physical and experiential growth of all students. The educational program is centred on the integral formation of the human person, aiming to enable all to reach their full potential immersed in an environment that aspires to Human Excellence and the promotion of a faith that does justice.

Child safety and wellbeing are central to this mission. The College is committed to:

- Creating an environment that prevents child abuse and protects every student from harm
- Embedding child safety in all governance, leadership, risk management and strategic decision-making
- Reducing the likelihood of harm occurring while increasing the likelihood that harm is identified and reported
- Treating the safety, individual care (*cura personalis*) and wellbeing of each person as paramount

3. PRINCIPLES

The College's commitment to child safety is founded on:

- The dignity of every human person is fundamental to Catholic and Jesuit teaching
- All children have the right to be safe and to feel safe
- Child development depends on the quality of care provided by significant adults in students' lives
- Families are primarily responsible for the care and protection of children; where a child's welfare is or may be at risk, intervention on behalf of the child is obligatory
- Child safety, wellbeing and protection is a shared responsibility across the entire College community

- Prevention and treatment of child abuse requires a multidisciplinary, culturally sensitive response
 - All staff must intervene on behalf of children regardless of cultural or other considerations
 - Cooperation with government departments and human service organisations is essential
 - All people involved in abuse concerns are treated with sensitivity, dignity and respect.
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4. PURPOSE

This policy:

- Explains key legislative concepts and obligations relating to child protection in New South Wales.
 - Sets out expectations regarding child safeguarding, including mandatory reporting, reportable conduct and Working With Children Check (WWCC) requirements.
 - Describes College processes for responding to child safety concerns, allegations and disclosures.
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5. SCOPE

The policy applies to all staff members (who for the purposes of this policy includes: employees, Jesuits and Partners in Mission, Board and Committee members, contractors, volunteers and any person engaged by the College to provide services to students), and forms part of their conditions of engagement.

All staff must:

- Read and acknowledge this policy upon engagement and annually thereafter
 - Comply with the relevant Code of Conduct and Australian Province Code of Conduct
 - Maintain professional boundaries in all interactions with students
 - Reflect child safety values in their daily practice
 - Understand and comply with their legal obligations under child protection legislation
 - Report concerns about student safety, welfare and wellbeing to the Principal
 - Treat all safeguarding information confidentially
 - Not engage in conduct that harms or risks harming a student
 - Failure to comply with this policy may result in disciplinary action including termination of employment or engagement.
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6. GOVERNANCE, ROLES AND RESPONSIBILITIES

Safeguarding children is a whole of community responsibility. The College has developed a responsibility framework to ensure all members know their obligations and responsibilities.

6.1 Board of Directors

The Board is responsible for providing strategic leadership, resources, and oversight to ensure child rights and safeguarding are embedded in the culture, governance, and operations of the College.

Culture and child rights

- Champion child rights and actively promote a culture that empowers children and prioritises their safety and wellbeing within all College activities and decisions.
- Embed safeguarding considerations and children’s voices in all business, risk, and strategic planning processes.

Governance and policy oversight

- Provide governance oversight and endorsement of safeguarding policies and the child safeguarding framework.
- Ensure safeguarding policies are reviewed and updated in accordance with the Policy Review Schedule and in response to legislative, regulatory, and organisational changes.

Resourcing, implementation, and assurance

- Ensure adequate financial, human, and operational resources for the effective implementation of safeguarding policies, procedures, and the child safeguarding framework.
- Support and monitor the coordination and implementation of the child safeguarding framework, including receiving regular reports on safeguarding performance and compliance.
- Monitor compliance with safeguarding policies through structured reporting and review, seeking assurance that controls are effective and actions are implemented.

6.2 Principal (Head of Entity)

The Principal as the Head of Entity (HOE) is responsible for providing executive leadership, authority, and accountability for safeguarding across the College, ensuring that child safety, child rights, and reportable conduct obligations are embedded in all operations and decision-making.

Leadership and culture

- Act as the College’s lead safeguarding advocate, including within the Board of Directors, modelling and promoting a strong child-safe culture.
- Ensure effective communication and engagement so children, young people, and families are informed, heard, and involved in decisions that affect them.

Policy implementation and workforce support

- Oversee the implementation of safeguarding policies and procedures across the College and assign clear responsibility to ensure all Staff can access, understand, and apply them.
- Ensure all managers and supervisors receive appropriate support and advice to implement safeguarding policies and procedures in their areas of responsibility.

Incident management and external reporting

- Ensure reports of child abuse and neglect are handled fairly, with due process and in a timely manner, including the establishment of a Critical Incident Team (CIT) for Critical incidents.
- Lead, or appoint a suitable delegate to lead, internal and external incident reviews and investigations, fulfil Reportable Conduct obligations, and initiate (or delegate) mandatory and other external reports to authorities as required by legislation and policy.

For the purposes of this policy, the Principal’s delegates for management of child safety issues are:

- Deputy Principal Students (Senior School)

- Director of Regis (Regis Campus)
- Director of Boarding (Boarding Students)
- Chief Risk Officer (appointed Child Safeguarding Coordinator)
- Chief People Officer (staff and reportable conduct related matters)
- College Counselling Team. For disclosures made to the College Counselling Team, the Principal delegates the reporting obligation to the Head of Psychological Services.

Where an allegation involves the Principal, reports must be made to the Chair of the College Board.

6.3 Child Safeguarding Coordinator (Chief Risk Officer)

The Child Safeguarding Coordinator is responsible for providing operational leadership, expert advice, and oversight to ensure that safeguarding policies and relevant laws are embedded in everyday practice across the College.

Leadership and governance

- Provide operational leadership to embed safeguarding policies and relevant legislation in day-to-day College practice.
- Serve as the College’s primary contact for safeguarding information, advice, and resources.
- Provide quarterly reports to the Principal and Board on the performance and effectiveness of the child safeguarding framework.

Compliance and workforce support

- Oversee compliance with safeguarding policies and related procedures, ensuring that Staff understand and implement their obligations.
- Provide guidance, support, and capacity building for Staff, including coordinating safeguarding training across the College.

Incident management

- Receive and manage safeguarding incident reports, maintaining accurate and confidential records.
- Assess reported incidents, notify appropriate Staff in line with College policies, and coordinate incident response and recovery activities.
- Support the Executive to stabilise situations, liaise with key stakeholders, and ensure incident details are documented, including reporting all moderate and critical incidents to the Principal and, where required, to the Critical Incident Team (CIT).

6.4 Executive Leadership Team

Leadership and culture

- Build regular opportunities for discussion, review, and reflection to promote openness, continuous improvement, and accountability for keeping children safe.
- Promote the College’s commitment to safeguarding, and its expectations of Staff, both internally and publicly.

- Support all Staff to recognise the strengths of First Nations cultures and the diversity of the Inclusion Program. Support all staff to understand their role in the safety and wellbeing of First Nations and Inclusion Program Students, and to foster a culture of diversity and inclusion for all.

Governance, review, and support

- Review and analyse complaints, concerns, and safety incidents to identify trends, lessons, and opportunities for improvement, and report key safeguarding learnings to the College Chief Risk Officer for communication to the Board.
- Ensure appropriate supports, such as counselling and formal debriefing, are available to Staff involved in responding to concerns about a child’s safety and wellbeing.
- Proactively share, and support the sharing of, resources and experience to develop and strengthen child safe initiatives across the College.

Workforce, implementation, and incident management

- Ensure Staff are informed about, and apply, appropriate recruitment, screening, and employment practices in relation to safeguarding children.
- Provide, or support the provision of, safeguarding training on policies and the safeguarding framework, ensuring managers and supervisors have access to support, advice, and resources to implement these requirements.
- Implement safeguarding policies and procedures across the College, including establishing CITs for moderate and critical incidents and initiating, or ensuring the initiation of, external reports to authorities where required.

6.5 All Staff

All staff within the College have a duty of care, and at times a legal obligation, to take reasonable steps to prevent harm to children by promoting child rights, complying with safeguarding policies, and responding promptly to risks and incidents.

Policy knowledge and compliance

- Know, understand, and comply with safeguarding policies, procedures, and all other relevant policies for keeping children safe, including completing required induction and ongoing training.
- Demonstrate safe, respectful practice and behaviour in all interactions with children and young people, taking reasonable steps to protect them from abuse and neglect.

Culture and risk management

- Promote child rights and actively empower and engage children in support of safeguarding policies, while supporting a culture of openness, continuous improvement, and accountability through discussion, constructive feedback, and risk identification.
- Identify and assess risks in ongoing programs and one-off activities (including online, physical, and psychological risks) and implement appropriate controls.

Incident response and reporting

- Seek guidance from an Executive member or manager when unsure about safeguarding expectations, and promptly notify the Principal or delegate(s) of any incidents.
- Stabilise situations where required (including liaising with stakeholders and recording details), take immediate action to manage incidents when necessary and safe, and report any suspected,

disclosed, or observed abuse in line with policies and laws—regardless of the alleged person's relationship to the child.

- Complete incident report forms accurately and escalate them to the Chief Risk Officer.

6.6 Child Safeguarding Committee

The Child Safeguarding Committee provides leadership, champions safeguarding implementation, and oversees the review and implementation of all aspects of policies, procedures, and practices that contribute to the protection of children and young people.

7. CHILDREN, FAMILIES AND COMMUNITIES

7.1 Student Voice and Participation

The College recognises that students are the experts on their own experiences and safety. We provide students with:

- Clear, age-appropriate information about their rights and responsibilities
- Multiple, accessible pathways to raise concerns and questions (including through pastoral leaders, homeroom staff, boarding supervisors, wellbeing teams, student leaders)
- Assurance that their concerns will be listened to, taken seriously and acted upon
- Feedback about how their concerns have been addressed (where appropriate)
- Involvement in student safety initiatives (eg student wellbeing committees, peer support programs, student leadership roles)
- Regular surveys and consultations seeking student feedback on safety and wellbeing

7.2 Student Access to Support

Students can access support and raise concerns through:

- Pastoral leaders and teachers
- Boarding supervisors and resident staff (for boarders)
- Wellbeing and counselling staff
- Student leaders and peer support networks
- College Rector, Chaplain and spiritual leaders
- The Principal or Executive leadership team

Students can also raise concerns through the online reporting tool, **Your Safety First**.

Students are informed of these pathways during orientation, in student handbooks, during assemblies and through ongoing classroom discussion.

7.3 Communication with Families

The College communicates information about child safety and this policy to families through:

- Enrolment packs and parent information sessions (induction)
- Boarding orientation and parent handbooks

- Parent–teacher meetings and progress reports
- Newsletter updates and whole-school communications
- Website information and downloadable resources
- Parent education events addressing emerging child safety issues

7.4 Family Involvement in Safety Matters

Families are:

- Invited to be part of the College community's commitment to child safety
- Kept informed where appropriate about child safety concerns involving their student, except where doing so might compromise an investigation or a student's safety
- Encouraged to raise concerns directly with the College via multiple channels
- Provided with information about the Complaints Handling Policy and how to escalate concerns
- Involved in safety initiatives such as fundraising for mental health services, participation in digital safety workshops

7.5 Collaboration with External Agencies

The College works closely with:

- Department of Communities and Justice (DCJ) – regarding mandatory reporting and child protection matters
- NSW Police – regarding criminal matters and incidents
- Office of the Children's Guardian (OCG) – regarding reportable conduct and WWCC issues
- NSW Education Standards Authority (NESA) – regarding regulatory compliance
- Jesuit Province and Catholic Diocese – regarding religious and institutional oversight
- Local community services – regarding student wellbeing and support

8. EQUITY, DIVERSITY AND INCLUSION

8.1 Recognising Diverse Needs

The College acknowledges that some groups of children may be more vulnerable to abuse or may face particular barriers to reporting concerns. We respond with intentional, tailored support for:

- Aboriginal and Torres Strait Islander students – ensuring cultural safety and appropriate support
- Students with disability – adapting communication, ensuring accessibility of reporting channels, providing individualised support
- Boarding students – providing enhanced supervision and accessible support pathways given their residential context
- LGBTQ+ students – creating an inclusive, affirming environment free from discrimination
- Students from low-income families – removing barriers to participation in school life

8.2 Responsive and Inclusive Practices

The College will:

- Regularly review policies and practices to identify and remove barriers to safety and participation
- Ensure reporting mechanisms are accessible to all students, including those with communication needs
- Provide additional support to students in vulnerable circumstances
- Train staff in culturally responsive and trauma-informed practice
- Partner with families and community organisations to ensure tailored support
- Monitor and respond to emerging equity and safety issues

9. CHILD FOCUSED RESPONSE TO COMPLAINTS AND CONCERNS

9.1 Overview

The College has a comprehensive framework for managing and reporting all instances, allegations, disclosures, or reasonable concerns of abuse or neglect involving children. All Staff must understand and comply with these reporting requirements to ensure the safety and wellbeing of all students.

The College is committed to the critically important role of child abuse reporting in promoting and maintaining a child-safe environment. This framework ensures all incidents are reported and managed in a timely, sensitive, and consistent manner that prioritise the best interests of children.

Failure to report in accordance with this policy or the law will be viewed as a serious matter that, depending on the circumstances, may result in disciplinary action, grounds for dismissal, or constitute a criminal offence.

The College is committed to responding promptly, fairly and appropriately to complaints, concerns, allegations and disclosures about child safety. Our approach prioritises:

- The safety and wellbeing of the child
- The use of trauma-informed and culturally responsive practice
- Confidentiality and sensitivity
- Timely communication with those involved where appropriate
- Support and advocacy for all involved

9.2 Complaints Handling

The College prioritises children's rights, safety, and wellbeing, including the right to make a complaint via formal or informal mechanisms.

The College has developed a comprehensive Complaints Handling Policy and Child Safety Complaints Management Guidelines to guide members of the community to inform the College of child safety complaints.

Anyone can make a child safety related complaint or report to the College in person, in writing or over the phone.

To support students in raising concerns a child-friendly version of these child-focused complaints handling processes is included in the Student Code of Conduct document and Student Code of Conduct Canvas course provided to all students.

Full details are contained in the Complaints Handling Policy and the Child Safety Complaints Management Guidelines.

9.3 Responding

9.3.1 Responding to an Incident

Immediate responses include the care, support and communication actions that take place immediately following an incident to mitigate further harm and ensure the safety of the student, families and Staff.

1. Reduce the harm and risk of harm to those impacted by the incident including by:
 - making the surroundings safe to prevent immediate recurrence of the incident, for example
 - removing potentially harmful person(s)
 - increase supervision of the student
 - move uninvolved students away from the incident
 - moving to a safe place
 - alerting others to risks that extend beyond the local environment
 - Calling Emergency Services if required
2. Provide immediate care and support to the affected student, families, Staff, and others involved in the incident including addressing:
 - physical well-being e.g., providing first aid or arranging medical treatment if a person suffers any harm or injury because of the incident; and
 - emotional well-being (including psychological) e.g., arranging for coverage of duties and supervision, facilitating access to counselling, debriefing and support for others involved in the incident
3. Where possible, preserve evidence in situations where allegations or suspicions of abuse and neglect has occurred. This can include:
 - not cleaning or disturbing the area in which the abuse has occurred
 - protecting any physical items such as weapons from being touched or removed

9.3.2 Responding to a disclosure/allegation

When responding to a disclosure or allegation by a student, Staff should respond by:

- listening to the allegation or disclosure supportively, without dispute
- clarifying the basic details, without seeking detailed information or asking suggestive or leading questions, guided by our Safeguarding Incident Report Form
- providing reassurance that the student has done the right thing in telling you, are believed and the College will take immediate action in response to the disclosure / allegation
- explaining to the student that other people may need to be told, to stop what is happening. Do not promise to keep any information a secret
- reporting the matter as per the College’s policy requirements to the Principal or delegate
- record notes as early as possible to ensure all information is captured before completing the Safeguarding Incident Report Form.

In your responses to a disclosure or allegation by a student, you will need to consider the specific needs of the student. Consider the unique qualities of a student including, for example, whether the Student is

Aboriginal or Torres Strait Islander, has a disability, identifies as LGBTQI+ and has a culturally and linguistically diverse background.

9.3.3 Responding to a complaint

Information on how a member of the community can make a complaint can be found in our Complaints Handling Policy and the Student Code of Conduct. When responding to a complaint made by a student (or by another individual on behalf of a student) all Staff should follow the steps outlined in the College Complaints Handling Policy. Where the complaint relates to a disclosure or allegation against a member of Staff, follow the same steps listed in the above 'Responding to a disclosure/allegation' section.

Personnel should also:

- Answer any questions the student asks to the extent the member of Personnel is able or commit to following up with an answer
- Give clear advice about what will happen next to the extent the member of Personnel is able
- Provide any information about how the student will be supported to the extent the member of Personnel is able
- Where required, Personnel should seek guidance from the Chief Risk Officer as the Safeguarding Officer.

9.3.4 Responding to alleged abuse and harm of a Student by another Student

Responding to harm and abuse of a student by another student may require Child Protection intervention, and/or other additional support services for all Student involved.

Students who display harmful sexual behaviours require specific responses and supports that carefully examine the nature of their behaviours, developmental considerations, and any other contextual and contributing factors.

Any allegation or incident of this nature should immediately be reported to the Principal or delegate(s) to determine the appropriate internal and external reporting requirements.

9.3.5 Responding to a breach of Policy or procedure

Whilst an incident and or disclosure / allegation could include a breach of the Staff or Student Code of Conduct and the Child Safeguarding Policy, if there is no immediate response required as identified above, it is still deemed an incident/near miss and therefore required to be reported.

9.3.6 Risk Management during Mandatory Reporting Incidents

Risk management means identifying the potential for an incident or accident to occur and taking steps to reduce the likelihood or severity of its occurrence.

The Principal or delegate(s) is responsible for risk management throughout the incident and will assess risk at all stages of the process.

Following a Mandatory Reporting Incident, the Principal or delegate(s) will conduct an initial risk assessment to identify and minimise the risks to:

- the child(ren) who are the subject of the incident;
- other children who may be involved in the incident;
- any employee involved in the incident;

- the College; and
- the proper investigation of the incident.

The factors which will be considered during the risk assessment include:

- the nature and seriousness of the incident;
- the vulnerability and safety of the child(ren);
- the family circumstances;
- the nature of the position occupied by any employees involved; and
- the disciplinary history or safety of the those involved and possible risks to the investigation.

The Principal or delegate(s) will take appropriate action to minimise risks. When taking action to address any risks identified, the College will take into consideration both the needs of the child(ren), the family circumstances and the needs of any employees involved.

A decision to take action on the basis of a risk assessment is not indicative of the findings of the matter.

The Principal or delegate(s) will continually monitor risk during the incident including in the light of any new relevant information that emerges.

9.4 Reporting Concerns About Student Safety and Wellbeing

9.4.1 All Staff Responsibilities

Once the immediate response to the situation is completed, it is important to fulfill the internal and external reporting requirements.

Staff are required to report any reasonable concerns or instances of abuse or neglect by any person immediately, or if that is not possible, no later than before ending that person's shift or session of work.

Staff are also required to formally report any concerns for breaches to College policies and procedures by other Staff within the College to the Principal or delegate(s).

Staff should follow the guidance on the Safeguarding Incident Report Form to complete the form accurately and to the best of their ability. All reports must be documented fully and written factually and objectively. Clear and accurate reporting can assist to support any internal or external investigation which may be required after an incident.

The College and Staff must maintain confidentiality of information at all times.

All staff members, whether or not they are mandatory reporters, must report any concern regarding the safety, welfare or wellbeing of a student to the Principal (or delegate) as soon as possible. This includes:

- Observations of harm or risk of harm to a student
- Disclosures by students about their own experiences
- Disclosures by other students, parents or community members
- Concerns that do not meet the threshold of "risk of significant harm"

Staff who are unsure whether a concern meets the mandatory reporting threshold must report it to the Principal (or delegate) regardless.

Staff must not:

- Conduct their own investigation into concerns. It is not the role of Staff to identify or investigate an allegation/concern. However, Staff must continue to report each new instance of suspicion of harm and/or breach of policy as they become aware, and to seek advice from the Chief Risk Officer, Deputy Principal Students or the Chief People Officer when they are unsure
- Inform parents or caregivers that a report has been made to DCJ
- Treat the matter as confidential in a way that prevents appropriate escalation to the Principal.

All Staff are responsible for understanding and complying with College reporting requirements. Training in reporting obligations is provided during induction and annually thereafter. Staff should seek guidance from the Principal or delegate(s) if they are uncertain about reporting requirements in any situation.

9.5 Mandatory Reporting Obligations

Mandatory reporting refers to the legislative requirement for specified classes of people to report suspected child abuse and neglect to government authorities.

9.5.1 Who must report

In NSW, the following Staff are mandatory reporters and must make a report to the Child Protection Helpline if they have reasonable grounds to suspect that a child (under 16 years, or under 18 years where the child has a disability) is at risk of significant harm.

Under the Children and Young Persons (Care and Protection) Act 1998 (NSW) a mandatory reporter includes:

- a person who, in the course of his or her professional work, or other paid employment, delivers health care, welfare, education, children's services, residential services or law enforcement, wholly or partly, to children.
- a person who holds a management position in an organisation, the duties of which include direct responsibility for, or direct supervision of, the provision of health care, welfare, education, children's services, residential services or law enforcement, wholly or partly, to children.
- a person in religious ministry, or a person providing religion-based activities to children.
- a registered psychologist providing a professional service as a psychologist.

All staff members, whether or not they are mandatory reporters, must report any concern regarding the safety, welfare or wellbeing of a student to the Principal (or delegate) as soon as possible. The Principal or delegate(s) may assist to report to the Child Protection Helpline.

9.5.2 What to report

A mandatory report should be made when a person has reasonable grounds to suspect that a child, young person, or person at risk is at risk of significant harm, and the child's or young person's parents have not protected, or are unlikely to protect, the child or young person from that harm.

Staff who are unsure whether a concern meets the mandatory reporting threshold must report it to the Principal (or delegate) regardless.

9.5.3 When to report

Mandatory reporters must make a report as soon as practicable after forming a reasonable belief that a child or young person is at risk of significant harm. Staff are required to report any reasonable concerns or instances of abuse or neglect by any person immediately, or if that is not possible, no later than before ending that person's shift or session of work.

Reports should not be delayed pending internal discussions or investigations.

9.5.4 How to report

- NSW Child Protection Helpline: 132 111 (24 hours, 7 days)
- Reports can be made by telephone or online

Mandatory reporters must also:

- Inform the Principal or delegate(s) that a mandatory report has been made
- Complete a Safeguarding Incident Report Form for College records

9.5.5 Criminal Offences under Mandatory Reporting

Under NSW legislation, certain failures to report constitute criminal offences:

- **Failure to Report:** Adults who know, believe, or reasonably ought to know that a child has been abused and fail to report the information to Police commit an offence (maximum penalty: 2 years imprisonment)
- **Failure to Protect:** An adult working in a school, therefore all staff members, will commit an offence if they know another adult working there poses as serious risk of committing a child abuse offence and they have the power to reduce or remove the risk, and they negligently fail to do so either by acts and/or omissions. This offence is targeted at those in positions of authority and responsibility working with children who turn a blind eye to a known and serious risk rather than using their power to protect children
- **Concealing Child Abuse Offence:** Adults who know, believe, or reasonably ought to know that a serious child sexual offence has been committed against a child by another adult and fail without reasonable excuse to report it to Police commit an offence (maximum penalty: 2 years imprisonment)

9.6 Reasonable Grounds and Risk of Significant Harm

9.6.1 Reasonable Grounds

"Reasonable grounds" means an objective basis for suspecting a child or young person may be at risk of significant harm, based on:

- First-hand observations of the child, young person or family
- What the child, young person, parent or another person has disclosed
- What can reasonably be inferred based on professional training and/or experience

Reasonable grounds does NOT require proof or confirmation of suspicions.

9.6.2 Risk of Significant Harm (ROSH)

'Risk of significant harm' refers to circumstances where there are current concerns for the safety, welfare, or wellbeing of a child or young person due to:

- Physical abuse
- Sexual abuse
- Emotional or psychological harm
- Neglect
- Exposure to domestic violence

What is significant is not minor or trivial and may reasonably be expected to produce a substantial and demonstrably adverse impact on the child or young person's safety, welfare or wellbeing. Significance can result from a single act or an accumulation of acts.

9.6.3 Use of the Mandatory Reporter Guide

Mandatory reporters must use the NSW Mandatory Reporter Guide (which is included with the Safeguarding Incident Report Form on InsideView) to determine whether concerns meet the ROSH threshold. Where concerns meet the threshold, a report must be made to DCJ as soon as practicable with the name (or description) of the child and grounds for suspicion.

9.7 Mandatory Reporting Process – Staff Members

When staff members have reasonable grounds to suspect a child or young person may be at risk of significant harm:

- Raise concerns with the Principal (or delegate) as soon as possible to discuss whether the matter meets ROSH threshold and the steps required
- Document factual information about observations or disclosures using the Safeguarding Incident Form on InsideView
- Do NOT conduct an investigation
- Do NOT inform parents or caregivers that a report to DCJ has been made
- Maintain confidentiality, disclosing information only to the Principal (or delegate) or as required by law

If there is immediate danger to a child or young person and the Principal (or delegate) is not contactable:

- Contact NSW Police and/or the Child Protection Helpline (13 21 11) directly
- Inform the Principal or next most senior staff member as soon as practicable

9.8 Mandatory Reporting Process – The College

9.8.1 Reports to DCJ

The Principal (or delegate) will:

- Ensure a mandatory report to DCJ has been submitted when concerns meet ROSH threshold as soon as practicable
- Include in the report the child's name (or description) and grounds for suspicion

- Where appropriate, coordinate with NSW Police to address criminal matters

9.8.2 Allegations Against Staff: Dual Reporting to OCG and DCJ

Where a mandatory report to DCJ involves an allegation against a staff member, contractor, volunteer or other person engaged by the College to provide services to children:

- The Principal (or delegate) must also notify the Office of the Children's Guardian (OCG) under the reportable conduct scheme
- Staff members must take any action within their power to protect the student or other students from potential child abuse offences

9.8.3 College Reporting to DCJ and Police

In general, the Principal (or delegate) will:

- Make or authorise mandatory reports to DCJ
- Make reports to NSW Police where a criminal offence may have occurred
- Report matters involving allegations against staff, contractors or volunteers to the OCG under the reportable conduct scheme

9.8.4 Child Wellbeing Concerns

Child wellbeing concerns are safety, welfare or wellbeing concerns that do not meet the ROSH threshold under mandatory reporting law. These include:

- Minor conflicts or disagreements
- Student adjustment issues not involving harm
- Concerns that are being adequately managed through pastoral support

All staff must report any child wellbeing concern to the Principal (or delegate) who will assess whether:

- Further support should be provided by the College
- A mandatory report to DCJ should be made
- Other external services should be engaged

Reporting should be first done verbally and followed up with a Safeguarding Incident Form on InsideView.

9.9 Reportable Conduct Scheme

The Reportable Conduct Scheme requires the College to notify the Office of the Children's Guardian (OCG) of allegations of reportable conduct and reportable convictions employees. For the purposes of reportable conduct this includes:

1. Employees of the College (including religious ministry)
2. any volunteer engaged to provide services to children
3. any contractor who holds, or is required to hold, a WWCC for the purposes of the engagement with the College
4. the head of a third-party employer contracted to provide services to children on behalf of the College, if the individual holds or is required to hold a WWCC

The College needs to notify the OCG of any reportable allegation or conviction against its employees, whether or not the alleged conduct is work-related. This means that for all employees of the College, any reportable allegation arising in their personal life is captured by the Scheme.

Employees in the College are recognised to have positions of authority over children and a duty of care to children.

The Principal as the Head of Entity (HOE) exercises Reportable Conduct responsibilities under the scheme.

There is a difference between 'reportable conduct' and a 'reportable allegation'. This difference is important because the Scheme is an allegations-based scheme. The College must notify the OCG when a reportable allegation has been received or observed.

Reportable allegation

A reportable allegation is an allegation that the employee has engaged in conduct that may be reportable conduct.

At the allegation stage, there does not need to be any proof that the alleged conduct occurred, or that it is likely to have occurred.

Reportable conviction

The College must also notify the OCG when an employee has a reportable conviction. These are convictions of an offence involving reportable conduct.

The HOE must notify the OCG of the reportable allegation or reportable conviction within 7 business days of becoming aware of it.

The College must submit the notification and reports using OCG's notification forms. The forms are available at [Reportable conduct notification forms](#). Further information on responding to and investigating reportable allegations can be accessed [HERE](#).

Information and guides to help organisations covered by the Reportable Conduct Scheme are available via the OCG's [website](#).

9.9.1 What is Reportable Conduct?

Reportable conduct means:

- Sexual offences committed against, with, or in the presence of a child
- Sexual misconduct committed against, with, or in the presence of a child
- Ill-treatment of a child
- Neglect of a child
- Assault of a child
- An offence under section 43B (failure to protect) or 316A (failure to report) of the Crimes Act 1900
- Behaviour that causes significant emotional or psychological harm to a child

9.9.2 Who must be reported?

Allegations of reportable conduct against:

- Employees of the College (including people in religious ministry)
- any volunteer engaged to provide services to children
- any contractor who holds, or is required to hold, a WWCC for the purposes of the engagement with the College
- the head of a third-party employer contracted to provide services to children on behalf of the College, if the individual holds or is required to hold a WWCC

9.9.3 Reportable conduct does not include:

- Reasonable management, discipline or care consistent with age, maturity and relevant professional standards
- Trivial or negligible physical force where the circumstances have been appropriately investigated and recorded
- Conduct exempted by the Children’s Guardian Act

9.9.4 Notification to the OCG:

When the Principal has assessed that the information they have received is a reportable allegation or reportable conviction, they are required to notify the OCG within 7 business days of becoming aware of the information.

The Principal, as HoE, must notify the OCG of:

- All allegations of reportable conduct and reportable convictions involving an employee when the allegation becomes known to the HoE
- The outcome of the College’s investigation into those allegations, including any finding of reportable conduct

Sustained findings involving sexual misconduct, sexual offences or serious physical assault must be referred to the OCG’s WWCC Directorate.

The College must submit the notification and reports using OCG’s notification forms. The **7-day** notification form and **30-day** interim report form (if the College has not completed its investigation or determination within 30 days) are available at [Reportable conduct notification forms](#).

9.10 Reporting to the Province and the ACF

The College is required to report specified incidents to the Australian Childhood Foundation (ACF) as part of external accreditation requirements. This is done through the Province Office, specifically via the Executive Director of Jesuit Education Australia (JEA).

10. SAFEGUARDING INCIDENT MANAGEMENT

Compliance with this policy ensures all incidents are managed in a way that is responsive to the immediate circumstances, respects the rights of those involved, and wherever possible, minimises risks of recurrence.

10.1 Categorisation of Incidents

The effective categorisation of safeguarding incidents is a critical component of the College's child safeguarding framework. All Staff are encouraged to remain vigilant and alert to the possibility of incidents that potentially expose children to risk.

Categorisation is an essential activity in incident management. The main objective is to understand what type of incident has occurred, and therefore how to manage most effectively. Over time, when incidents are categorised consistently, the data can be used to identify trends and focus efforts on improving proactively.

Given the broad definition of what constitutes an incident, three categories have been developed to allow for specialised responses based on the actual or potential severity of impact.

10.1.1 Minor Incidents

Events which cause or may cause minor physical stress and/or emotional stress to Students or Staff.

Near misses and minor breaches of professional standards or College policy (for example the Code of Conduct) that do not compromise the health and safety of clients/service users, including students and Staff.

10.1.2 Moderate Incidents

Events which cause or are likely to cause physical stress or emotional distress to Students or Staff.

Near misses and criminal behaviour or breaches of professional standards or agency policy (for example the Code of Conduct) by Staff that may compromise the health and safety of students, and Staff.

10.1.3 Critical Incidents

Criminal behaviour, breaches of professional standards or College policy (for example Code of Conduct) by Staff that cause harm to or significantly compromise the health and safety of clients/service users, including children, young people, people at risk, and Staff.

A Critical Incident, in relation to a child under the care of the College (whether at the relevant time the child is on premises controlled by the College or is otherwise under the physical supervision of the College) includes the occurrence of any of the following events or any similar event:

a. The child dies and:

- Abuse or neglect is known or suspected to be a factor in the death
- The death is, or appears to be, the result of suicide or accident
- The death is, or appears to be, the result of alleged murder, homicide, reckless conduct or an act of violence

b. The child is under statutory care:

- A child has not died but has sustained significant harm or is at risk of harm under the categories described in the relevant jurisdictional legislation of abuse and neglect

c. Australian Childhood Foundation (ACF) Notification:

- ACF, through de-identified reporting, notifies the College that an incident or an accumulation of incidents has occurred that, in ACF's opinion, gives rise to serious concerns about the adherence by the College to any part of the child safeguarding framework.

10.2 Investigation Procedures

After each incident, appropriate investigation procedures are followed to establish facts, identify causes, and determine necessary actions for prevention and continuous improvement.

Full details contained in procedures.

10.2.1 Internal Investigation

An internal investigation is conducted by a member of the College Executive as appointed by the Principal for all moderate and critical incidents, and for minor incidents where investigation is deemed necessary.

When the College lacks the specific skills or impartiality to complete a fair investigation, an incident may be contracted out to an external investigator. The Principal may also initiate an external review at any time.

Where there is or may be a breach of canon law (e.g., where a Jesuit is involved), the Provincial must be notified to enable further action and required reporting.

10.2.2 External Investigation

In some cases, external investigation may be instigated by an external regulatory body as part of a licensing or compliance requirement.

In some instances, the internal investigation or incident review may continue separately from the criminal/child protection investigation. However, it will usually be appropriate to suspend the internal review because of issues relating to the disclosure of information. This should be confirmed with the external agency as appropriate.

10.3 Criminal Acts and Misconduct

If while categorising, investigating, or reviewing an incident it is suspected that the incident may involve criminal acts, the College must refer the matter to the appropriate external body (i.e. Police/Office of Children's Guardian) so it can be addressed using the appropriate legal processes.

10.3.1 Reporting Criminal Acts

All suspected criminal activity must be reported to:

- The Principal (or delegate)
- Police
- In the case of a suspected canonical crime by a Jesuit, to the Provincial and the Local Ordinary under Vos Estis

10.3.2 Coordination with Criminal Investigations

In some instances, the internal investigation or incident review may continue separately from the criminal/child protection investigation. However, it will usually be appropriate to suspend the review because of issues relating to the disclosure of information. This should be confirmed with the external agency as appropriate.

10.3.3 Misconduct

If while categorising, investigating, or reviewing an incident it is suspected that the incident may contain elements of misconduct, the matter should be referred to the Chief People Officer or the Principal so it can be addressed using the appropriate Staff management processes.

10.3.4 Management of Misconduct

Where an allegation involves Staff within the College, the Chief People Officer or the Principal will:

- Consider if such conduct contravenes the College's Code of Conduct
- Act in accordance with the Reportable Conduct Scheme if required by law
- Initiate appropriate Staff management or disciplinary processes
- Ensure procedural fairness throughout the process
- Maintain confidentiality as appropriate

10.3.5 Coordination with Misconduct Processes

The internal investigation or incident review may continue separately from the misconduct processes unless advised by the Chief People Officer or the Principal to cease the review because of issues relating to procedural fairness and transparency.

10.4 Risk Management during Reportable Conduct and Misconduct Incidents

Risk management means identifying the potential for an incident or accident to occur and taking steps to reduce the likelihood or severity of its occurrence.

The Principal is responsible for risk management throughout the investigation and will assess risk at the beginning of the investigation, during and at the end of the investigation.

Following an allegation of reportable conduct against an employee, the Principal conducts an initial risk assessment to identify and minimise the risks to:

- the child(ren) who are the subject of the allegation;
- other children with whom the employee may have contact;
- the employee subject to the allegation (ESOA);
- the College; and
- the proper investigation of the allegation.

The factors which will be considered during the risk assessment include:

- the nature and seriousness of the allegations;
- the vulnerability of the child(ren) the ESOA has contact with at work;
- the nature of the position occupied by the ESOA;
- the level of supervision of the ESOA; and
- the disciplinary history or safety of the ESOA and possible risks to the investigation.

The Principal will take appropriate action to minimise risks. This may include the ESOA being temporarily relieved of some duties, being required not to have contact with certain students, being asked to take paid leave, or being suspended from duty.

When taking action to address any risks identified, the College will take into consideration both the needs of the child(ren) and the ESOA.

A decision to take action on the basis of a risk assessment is not indicative of the findings of the matter. Until the investigation is completed and a finding is made, any action, such as an employee being suspended, is not to be considered to be an indication that the alleged conduct by the employee did occur.

The Principal will continually monitor risk during the investigation including in the light of any new relevant information that emerges.

Refer to OCG's Reportable Conduct [fact sheets](#) (e.g. HOE and reportable conduct responsibilities, risk management following an allegation, planning and conducting an investigation, making a finding of reportable conduct) for details.

11. COMMUNICATION AND SUPPORT

Effective communication and comprehensive support are essential elements of the College's safeguarding framework. This section outlines how the College manages communication about safeguarding policies, procedures, and incidents, while ensuring appropriate support is provided to all affected individuals. Transparent communication and compassionate support contribute to a culture of safety, accountability, and continuous improvement.

11.1 Internal Communication

The College maintains robust internal communication processes to ensure all Staff, students, and families are informed about safeguarding policies, procedures, expectations, and any material changes that may occur. This occurs through:

- Communication of Safeguarding Policies and Procedures
- Policy Availability and Accessibility
- Induction and Orientation Communications
- Regular Training and Updates
- Staff and Key Stakeholder Communication
- Communication with Students and Families

11.1.1 Prohibited Communications:

Staff are prohibited from:

- Discussing concerns or allegations with unauthorised Staff—within or outside the College—such prohibition not being designed to limit their rights and responsibilities to report concerns or allegations, but rather as part of the College's commitment to ensuring privacy, confidentiality and natural justice

- Making deliberately false, misleading or vexatious allegations
- Discussing the details of incidents or investigations with persons who do not have a legitimate need to know

11.2 External Communication

The College manages external communications regarding safeguarding matters with care to ensure transparency, accountability, and protection of all parties involved. All external communications are managed directly by the Principal and the Chief Advancement Officer.

11.2.1 Media Management

In the event of media interest in a safeguarding matter:

- All media inquiries are referred to the Principal or the Chief Advancement Officer
- Media statements are prepared in consultation with the Board and legal advisors as appropriate
- Communications prioritise the protection of children
- Privacy and confidentiality obligations are strictly maintained
- Staff are instructed not to speak to media about safeguarding incidents

11.2.2 Reporting to Province and ACF

Safeguarding data trend reports from both the Safeguarding Incident Reports and Risk Registers are provided to the Province Office via the Executive Director JEA in the manner and timeframe as determined from time to time.

Safeguarding critical incidents must be reported to ACF via the Executive Director JEA within 24 hours of the College becoming aware of the incident.

Moderate incidents are reported to ACF via the Executive Director JEA in accordance with ACF and Province agreed protocols.

All information reported to the ACF will be de-identified data only.

11.3 Support for Affected Individuals

The College is committed to providing comprehensive, culturally appropriate support to all individuals affected by safeguarding incidents. This support is provided to:

- Children
- Families
- Staff Who Report Incidents
- Staff Against Whom Allegations Are Made
- Support for Other Staff Impacted by Incidents

It is important to make clear to all other Staff who are aware of the incident that:

- Any allegation does not mean the person is guilty, and that the allegation will be properly investigated and will include the right to 'procedural fairness'

- They are not to discuss the matter with any person, except as directed by police, child protection authorities, and/or the Principal or delegate(s) and only in direct relation to investigation of the allegation.

The College ensures appropriate supports, such as counselling and formal debriefing, are provided to any Staff involved in a matter relating to responding to a concern for the safety and wellbeing of a child, young person, or person at risk.

11.4 Confidentiality and Privacy

The College is committed to maintaining confidentiality and privacy in all safeguarding matters while balancing the need for appropriate information sharing to ensure safety.

11.4.1 Privacy Principles

All safeguarding information is managed in accordance with:

- The College's Privacy Policy
- Relevant privacy legislation including the Privacy Act 1988 (Cth)
- NSW privacy legislation
- Mandatory reporting and other child protection legislation
- Employment law obligations
- Principles of natural justice and procedural fairness

11.4.2 Confidentiality Obligations

Staff are required to:

- Maintain strict confidentiality regarding all safeguarding matters
- Only discuss safeguarding information with authorised Staff
- Not disclose information to unauthorised persons including colleagues, family, friends, or social networks
- Protect all written, electronic, and verbal information
- Understand that breaches of confidentiality may result in disciplinary action

Exceptions to confidentiality:

- Reporting to designated College Staff as outlined in this policy
- Reporting to external authorities as required by law
- Sharing information in accordance with lawful information-sharing provisions
- Disclosure as directed by police, child protection authorities, or the Principal in relation to investigation

11.4.3 Information Storage and Security

All safeguarding records are:

- Stored securely in systems with restricted access
- Protected in accordance with privacy legislation
- Retained for appropriate periods as required by legislation and best practice

- Accessible only to authorised Staff with a legitimate need to know
- Disposed of securely when retention periods expire

11.4.4 Decision-Making About Information Sharing

The decision to share information will consider:

- Whether the ongoing safety of those involved in or impacted by the incident is compromised by the sharing or non-sharing of information
- The advice of police and child protection (care will be taken not to compromise their investigations)
- Relevant privacy legislation and information-sharing provisions (where provisions allow for the responsible exchange of information between relevant parties to promote child safety)
- The rights of those impacted by the incident to privacy, confidentiality, procedural fairness, and a presumption of innocence in accordance with College policies and employment law, and the need (of those potentially impacted by the incident) to know of the incident

All information-sharing decisions must be approved by the Principal.

11.4.5 Protection of Staff Information

Where an allegation about the conduct of Staff is received the allegation will be dealt with in a confidential manner that is respectful to both complainant and respondent.

Reasonable steps will be taken to protect Staff information from loss, unauthorised access, use, disclosure, or any other misuse during the complaint-handling and investigation process. However, the College cannot give an assurance of absolute confidentiality, given statutory obligations and principles of natural justice.

11.4.6 Record-Keeping

The Chief Risk Officer as the Safeguarding Coordinator oversees the administration of:

- Completed Safeguarding Incident Report Forms
- Any other documentation relating to allegations and subsequent actions
- Investigation reports and findings
- Support plans and interventions
- Communication records

All records are maintained in accordance with the College's record-keeping policies and relevant legislation.

11.4.7 Monitoring and Review

All de-identified Safeguarding Incident Reports recorded on the Safeguarding Incident Register are regularly reviewed every quarter by the Executive and Safeguarding Committee to ensure:

- Privacy and confidentiality have been maintained
- Information sharing has been appropriate

- Support has been provided effectively
- Continuous improvement opportunities are identified

All Staff must understand and comply with confidentiality and privacy requirements. Breaches of confidentiality may result in disciplinary action and may constitute breaches of legal obligations. When in doubt about whether information can be shared, Staff should consult the Chief Risk Officer, Chief People Officer, or Principal before disclosing any information.

12. SUITABLE AND SUPPORTED PEOPLE WORKING WITH CHILDREN

The College has a comprehensive Recruitment and Employment Policy.

12.1 Recruitment and Screening

The College prioritises child safety in recruitment by:

- Including child safety and safeguarding obligations prominently in position descriptions
- Conducting behavioural interviewing that explores attitudes toward child safety and professional boundaries
- Verifying referee checks and requiring referee comments on the candidate's suitability for working with children
- Conducting national criminal history checks for selected appointments
- Verifying Working With Children Check (WWCC) clearance status prior to engagement
- Verifying academic and professional qualifications and registration
- Probation periods allowing observation of practice and cultural fit

12.2 Working With Children Check (WWCC) Overview

12.2.1 Legislative Framework

The Child Protection (Working with Children) Act 2012 (WWC Act) requires that workers engaged in child-related work hold a valid WWCC clearance. Failure to hold a valid clearance or to comply with an interim bar or bar can result in fines or imprisonment.

12.2.2 Responsibility of the Office of the Children's Guardian

The OCG:

- Assesses WWCC applications and renewals through national criminal history checks and review of workplace misconduct findings
- Grants WWCC clearances (generally valid for 5 years) when satisfied the person is suitable for child-related work
- Refuses or cancels WWCC clearances (restricting engagement in child-related work for 5 years) where risk is identified
- Issues interim bars (up to 12 months) for high-risk individuals pending risk assessment
- Conducts ongoing monitoring of WWCC clearance holders through risk assessments

12.2.3 What Constitutes Child-Related Work

Child-related work includes direct contact with children where that contact is a usual and more than incidental part of the work. At the College, roles involving child-related work include:

- Teaching and Professional and Operational Support
- Boarding and residential supervision
- Coaching and co-curricular leadership
- Counselling and mentoring
- Transport and excursion supervision
- Chaplaincy and religious services
- Cleaning, catering and contractors who access student areas or have direct contact unsupervised

Any queries about whether a role involves child-related work should be directed to the Chief People Officer.

12.3 WWCC Responsibilities of Staff, Volunteers and Contractors

All staff members and eligible volunteers and contractors engaging in child-related work must:

- Hold and maintain a valid WWCC clearance
- Not engage in child-related work while subject to an interim bar or bar
- Notify the Principal immediately if:
 - They become aware their WWCC clearance is at risk
 - They are notified of a risk assessment by the OCG
 - Their WWCC status changes or is cancelled
 - They are subject to an interim bar or bar
 - Notify the OCG of any change to personal details within 3 months of the change
 - Volunteers must comply with the Australian Province Code of Conduct and College policies

It is an offence to engage in child-related work without a valid WWCC clearance or while barred.

12.4 College Responsibilities for WWCC Management

The College will:

- Verify online and record the WWCC status of all child-related workers and eligible volunteers and contractors before engagement and on renewal
- Only engage child-related workers and eligible volunteers with a valid WWCC clearance
- Maintain secure records of verification
- Notify the OCG of allegations and findings of reportable conduct, particularly where sexual misconduct, sexual offences or serious physical assault is substantiated
- Provide additional information to the OCG as required for risk assessment or monitoring purposes

The College has detailed procedures for managing WWCC which are outlined in the Child Safeguarding Procedures.

12.5 WWCC Application, Refusal, Cancellation and Interim Bar

12.5.1 Application and Renewal

- Applications and renewals are made through Service NSW or its successor agency
- The OCG assesses applications and may grant, refuse or cancel clearance

12.5.2 Refusal

- The OCG may refuse a WWCC clearance where risk to children is identified
- A refusal restricts the person from child-related work for 5 years
- Further applications cannot be made for 5 years

12.5.3 Cancellation

- The OCG may cancel a WWCC clearance following a risk assessment
- Cancellation restricts the person from child-related work for 5 years
- The person must immediately cease child-related work

12.5.4 Interim Bar

- The OCG may issue an interim bar (up to 12 months) for high-risk individuals pending full risk assessment
- An interim bar prevents engagement in child-related work immediately
- Where an interim bar is in place for 6 months or longer, it may be appealed to the Administrative Decisions Tribunal

12.5.5 Disqualified Persons

- A person convicted of or facing proceedings for a disqualifying offence (Schedule 2, WWC Act) cannot hold a WWCC clearance
- Disqualified persons must not engage in child-related work

12.6 Ongoing Monitoring and Support

The College will:

- Provide professional development and training to all staff on child safety, mandatory reporting, reportable conduct and professional boundaries
- Supervise staff and volunteers in line with role requirements
- Provide support and feedback on performance, including safeguarding practice
- Address concerns about professional boundaries or conduct promptly
- Foster a culture of shared responsibility for child safety

13. STAFF DEVELOPMENT AND TRAINING

13.1 Mandatory Training

The College is committed to structured and supportive orientation to enable all new Staff to contribute to the College's mission, to be aware of their legal obligations, and to undertake their work roles quickly and effectively.

All new staff members must:

- Read this policy on appointment
- Complete an induction session on child safeguarding
- Sign an acknowledgement that they have read and understood the policy
- Understand their specific responsibilities under child protection legislation

Orientation and training requirements have been developed to ensure that all Staff, including employees, volunteers, and contractors are provided with the information they need to undertake their duties in accordance with the College's policies, procedures, and guidelines.

The College ensures Staff receive ongoing training and education in relation to keeping children safe.

13.1.1 Annual Refresher Training

All staff members must:

- Participate in annual child safeguarding education and training
- Receive updates on legislative changes or emerging issues
- Participate in role-specific training where applicable (eg boarding staff, co-curricular leaders, counsellors, Jesuit volunteers)

13.1.2 Training Content

Child safeguarding training covers:

- Mandatory reporting: definition of ROSH, use of the Mandatory Reporter Guide, reporting process
- Reportable conduct: definition, examples, notification to OCG
- Working With Children Check: obligations, management, interim bars and cancellations
- Forms of child abuse: neglect, sexual abuse, physical abuse, emotional abuse
- Professional boundaries and the Staff Code of Conduct
- Special care relationships and the criminal offences under the Crimes Act
- Failure to protect and failure to report offences
- Digital safety and emerging threats (eg deepfakes, image-based abuse)
- Trauma-informed and culturally responsive practice
- How to recognise and respond to disclosures
- The College's complaints and concerns process

- Record-keeping and confidentiality

13.1.3 Specialised Training

Staff in specific roles receive additional training relevant to their position:

- Boarding staff: residential supervision, welfare checks, recognising signs of abuse in residential contexts
- Counsellors and wellbeing staff: trauma-informed practice, mandatory reporting in counselling relationships
- Rector, Chaplains and spiritual directors: confidentiality, mandatory reporting, appropriate boundaries
- Coaches and co-curricular leaders: one-on-one interaction safety, appropriate physical contact, travel and off-site supervision
- Volunteers: College-specific policies, reporting obligations, boundaries

13.2 Compliance and Records

The College maintains:

- A register of all staff members who have completed induction and signed acknowledgement of this policy
- Records of attendance at annual and specialised training
- Evaluation feedback from training participants
- Training completion dates and gaps
- Evidence of policy updates and communication to staff

All staff must complete required training. Non-completion may affect employment status or ability to continue in role.

13.3 Ongoing Support and Development

The College will:

- Provide access to professional development opportunities in child safety, trauma-informed practice and safeguarding
- Offer supervision and mentoring, particularly for staff new to child-facing roles
- Provide support to staff involved in managing serious concerns or allegations (including Employee Assistance Program access)
- Create forums for staff to discuss challenges and share learning
- Solicit feedback from staff on training effectiveness and emerging training needs

14. PHYSICAL AND ONLINE ENVIRONMENTS PROVIDE SAFE ACCESS FOR CHILDREN

The College is committed to providing safe physical and online environments for all students. This includes ensuring safe environments when not on College grounds when students are in the care of the College.

14.1 Physical Environment Safety

The College undertakes risk assessments to minimise opportunities for abuse and ensure student safety in:

14.1.1 Boarding

- Student accommodation arrangements (supervision during day and night, access control, appropriate room assignments)
- Visitor protocols to boarding houses
- Leave protocols for boarding houses
- Bathroom and change room supervision
- Duty rosters ensuring staff presence and visibility

14.1.2 Classrooms and Teaching Spaces

- Visibility into classrooms (avoiding isolation)
- Appropriate use of private spaces (counselling rooms, medical facilities)

14.1.3 Excursions, Camps and Off-Site Activities

- Risk assessment of venue and activities
- Appropriate staffing ratios and supervision
- Emergency procedures
- Accommodation and transport safety
- Screening of external providers and volunteers
- Approval and consent processes

14.1.4 Co-Curricular Activities

- Appropriate supervision and staffing
- One-on-one coaching protocols
- Change room and bathroom management
- Travel to competitions and events
- Incident and Injury Reporting

14.2 Digital Safety and Online Environments

The College recognises the importance of online safety given students' engagement with digital technology. We address:

14.2.1 Digital Boundaries

- Staff–student communication protocols (eg approved platforms, avoiding personal accounts)
- Social media engagement expectations
- Photography and videography consent
- Appropriate use of technology in interactions with students

14.2.2 Student Online Safety

- Teaching digital literacy and safe online behaviour
- Cyberbullying identification and response
- Monitoring of school-managed systems and appropriate escalation of concerns
- Age-appropriate education about online abuse and exploitation

14.2.3 Emerging Threats

- Awareness of deepfakes, image-based abuse and sextortion
- Training for staff on recognising and responding to these threats
- Support for students who are victims of image-based abuse

14.2.4 Acceptable Use Agreements

All students and staff must comply with the Student and Staff Acceptable Use of Technology Policy, which sets out expectations for appropriate use of College technology and online engagement.

14.3 Crisis Management and Safety Planning

The College maintains:

- Evacuation and emergency procedures
- Mental health crisis response protocols
- Incident management procedures
- Anonymous reporting mechanisms (where appropriate)
- Regular review and updating of safety plans

15. MONITORING, REVIEW AND CONTINUOUS IMPROVEMENT

The College is committed to ongoing monitoring, regular review, and continuous improvement of safeguarding policies, procedures, and practices. This section outlines the frameworks and processes that ensure the child safeguarding framework remains current, effective, and responsive to emerging needs, legislative changes, and best practices.

Continuous improvement in safeguarding is not merely a compliance activity but a fundamental commitment to enhancing the safety and wellbeing of all children in the College community.

15.1 Policy Review Cycle

The College maintains a structured policy review cycle to ensure all safeguarding policies and procedures remain current, effective, and aligned with legislative requirements and best practice.

Responsibility for Policy Review:

- The Board supports policy review on a three-year cycle as a minimum and provides oversight and endorsement of safeguarding policies
- The Principal, in consultation with the Child Safeguarding Coordinator, monitors the child safeguarding framework

- The Safeguarding Committee reviews policies in consultation with the Principal and members of the Executive Team
- The Province collaborates with the College to inform and review safeguarding policies as required

15.2 Voice of Children, Young People, and Families

The College acknowledges the importance of children and young people and their families' voices and makes reasonable and appropriate efforts to provide opportunities for their voices to be included in the Safeguarding Children Governance review process.

15.3 Records of Review

Records are retained to document each review undertaken, including:

- Minutes of meetings
- Consultation records
- Documentation of changes to policies and procedures
- Approval records
- Communication records

15.4 Storage and Access

The College maintains secure storage systems for all safeguarding records, ensuring appropriate access controls, retention periods, and disposal procedures.

Accurate record-keeping is a professional and legal obligation. All Staff must understand and comply with these requirements. Records created and maintained by the College may be subject to subpoena, court order, or freedom of information requests. Poor record-keeping can compromise safeguarding, breach privacy obligations, and expose the College to legal and reputational risk.

16. DEFINITIONS AND ACRONYMS

Australian Childhood Foundation (ACF)	Engaged by the Province to conduct an accreditation program for Jesuit Ministries which have a duty of care to children while delivering a service activity to them and/or their families. The accreditation program systematically builds the capacity of Organisations to keep children safe from abuse and exploitation by staff, volunteers or other relevant related individuals. Further information can be found on the ACF website: https://www.childhood.org.au/
Bullying	Bullying involves the inappropriate use of power by one or more persons over another less powerful person or group and is generally an act that is repeated over time. Bullying has been described by researchers as taking many forms which are often interrelated and include: <ul style="list-style-type: none"> – Verbal (name calling, put downs, threats) – Physical (hitting, punching, kicking, scratching, tripping, spitting)

	<ul style="list-style-type: none"> - Social (ignoring, excluding, ostracising, alienating), and/or - Psychological (spreading rumours, stalking, dirty looks, hiding or damaging possessions).
Child /Children / Young Person/People	A person under the age of eighteen years.
Code of Conduct	The Province-approved document which has been adopted by The College and sets out what personal and professional standards mean for the Province, the Province's primary obligations and the associated behaviour that are expected of all Jesuits, Partners in Mission and Contractors, and how to report inappropriate behaviour. See Code of Conduct - the Code of Conduct aims to identify and prevent behaviour that may be harmful to Children, Young People and People at Risk in the Province and its Ministries. The Code of Conduct outlines what is, and what is not, acceptable behaviour or practice when working with or engaging with Children, Young People and People at Risk.
Child Abuse	All forms of physical and/or emotional ill- treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the Child's or Young Person's health, survival, development or dignity in the context of a relationship with a person of responsibility, trust or power.
Emotional or psychological abuse	Emotional or psychological abuse occurs when a Child, Young Person or Person at Risk does not receive the love, affection or attention they need for healthy emotional, psychological and social development. Such abuse may involve repeated rejection or threats to a Child, Young Person or Person at Risk. Constant criticism, teasing, ignoring, threatening, yelling, scapegoating, ridicule and rejection or continual coldness are all examples of emotional abuse. These behaviours continue to an extent that results in significant damage to the Child, Young Person or Person at Risk's physical, intellectual or emotional wellbeing and development.
Contractor	The College regularly contracts with non-employee individuals and organisations to perform services for the College. These non-employee individuals and organisations may also be referred to as 'independent contractors', 'consultants,' or 'vendors', and are referred to in this document as 'Contractors'.
Family Violence	Family violence occurs when Children, Young People or People at Risk are forced to live with violence between adults in their home. It is harmful to Children, Young People and People at Risk. It can include witnessing violence or the consequences of violence. Family violence is defined as violence between members of a family or extended family or those fulfilling the role of family in a Child, Young Person or Person at Risk's life. Exposure to family violence places Children, Young People and People at Risk at increased risk of physical injury and harm and has a significant impact on their wellbeing and development.
SOJA Consultative Committee	The Committee develops, reviews, and makes recommendations to the SOJA Board on policy and procedure frameworks of the Province Ministries.

Grooming	Grooming is a term used to describe what happens when a perpetrator of abuse builds a relationship with a Child with a view to abusing them at some stage. There is no set pattern in relation to the grooming of Children. For some perpetrators, there will be a lengthy period of time before the abuse begins. The Child may be given special attention and, what starts as an apparently normal display of affection, such as cuddling, can develop into sexual touching or masturbation and then into more serious sexual behaviour. Other perpetrators may draw a Child in and abuse them relatively quickly. Some abusers do not groom Children but abuse them without forming a relationship at all. Grooming can take place in any setting where a relationship is formed, such as leisure, music, sports and religious activities, or in internet chatrooms, in social media or by other technological channels.
Head of Ministry	Principal
Harm	Harm to a Child, Young Person or Person at Risk, is any detrimental effect of a significant nature on the person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by: <ul style="list-style-type: none"> - physical, psychological or emotional abuse or neglect - sexual abuse or exploitation - a single act, omission or circumstance, and - a series or combination of acts, omissions or circumstances.
Jesuit	Means any Priest or Brother member of the Society of Jesus in Australia or someone in formation for those roles (e.g., a novice or a scholastic)
LGBTQI+	(Lesbian, gay, bisexual, transgender, queer and intersex) as outlined in <i>Rainbow Tick National Accreditation</i> program for LGBTI inclusive practice throughout Australia. https://www.qip.com.au/standards/rainbow-tick-standards/
Ministry	A Province owned and/or governed organisation at which a Jesuit, Partner in Mission or Contractor works. As parishes and Companion Schools are governed by the relevant diocese or associated entity, they are excluded from this definition.
National criminal history record check	Involves identifying and releasing any relevant Criminal History Information (CHI) subject to relevant spent convictions/non-disclosure legislation and/or information release policies.
National Principles for Child Safe Organisations (National Principles)	The National Principles are designed to build capacity and deliver child safety and wellbeing in organisations, families and communities and prevent future harm. The Principles have been endorsed by all Commonwealth, state and territory governments. https://childsafe.humanrights.gov.au/national-principles
Mandatory Reporting	Under the Care and Protection Act mandatory reporting applies to persons who:

	<p>/in the course of their employment, deliver services including health care; welfare, education, children’s services and residential services, to children; or</p> <p>/ hold a management position in an organisation, the duties of which include direct responsibility for, or direct supervision of, the provision of services including health care, welfare, education, children’s services and residential services, to children, are mandatory reporters.</p>
Neglect	<p>Neglect is the persistent failure or deliberate denial to provide the Child, Young Person or Person at Risk with the basic necessities of life. Such neglect includes the failure to provide adequate food, clothing, shelter, adequate supervision, clean water, medical attention or supervision to the extent that the Child, Young Person or Person at Risk’s health and development is, or is likely to be, significantly harmed. Categories of neglect include physical neglect, medical neglect, abandonment or desertion, emotional neglect and educational neglect. The issue of neglect must be considered within the context of resources reasonably available.</p>
Online environment	<p>Anywhere online that allows digital communication, such as: social networks, text messages and messaging apps, email and private messaging, online chats, comments on live streaming sites and voice chat in games.</p>
Partners in Mission	<p>Partner in Mission means a lay person involved in the Australian Province of the Society of Jesus and its Ministries as:</p> <ul style="list-style-type: none"> - an employee - a member of a Board or Council - a volunteer - a consultant, or - a contractor.
Personnel	<p>All personnel of the Organisation, including; employees, casual staff, Board and committee members, volunteers and contractors involved with The College operational environments and without fail wherever Children, Young People and People at Risk are participating in our activities, programs, services and / or facilities. For the avoidance of doubt Personnel includes Jesuits and Partners in Mission.</p>
Physical abuse	<p>Physical abuse occurs when a person subjects a Child, Young Person or Person at Risk to non-accidental physically aggressive acts. The abuser may inflict an injury intentionally or inadvertently as a result of physical punishment or the aggressive treatment of a Child, Young Person or Person at Risk. Physically abusive behaviour includes (but is not limited to) shoving, hitting, slapping, shaking, throwing, punching, biting, burning, suffocating, excessive and physically harmful over training, and kicking. It also includes giving Children, Young People and People at Risk harmful substances such as drugs, alcohol or poison. Certain types of punishment, whilst not causing injury can also be considered physical abuse if they place a Child, Young Person or Person at Risk of being hurt.</p>

<p>Person/People at Risk</p>	<ul style="list-style-type: none"> - means any person aged 18 years and over who is at increased risk of experiencing abuse, or family violence, such as people: - who are elderly - with a disability - who suffer from mental illness - who have diminished capacity - who have cognitive impairment - who have suffered previous abuse - who are experiencing transient risks - who in receiving a Ministry or service are subject to a power imbalance - who identify as Aboriginal and/or Torres Strait Islander - who are from a culturally and linguistically diverse background - who are of diverse sexuality - who have any other impairment or adversity that makes it difficult for them to protect themselves from abuse.
<p>Principal/Head of Agency</p>	<p>Means the person who has day to day operational responsibility .</p>
<p>Provincial</p>	<p>The member of the Society of Jesus from time to time holding the office of Major Superior of the Province or, in the case of absence or indisposition, the Acting Provincial or, in the event of the office of the Provincial being vacant at any time, the member of the Society of Jesus for the time being performing the duties of Provincial.</p>
<p>Reasonable steps</p>	<p>Personnel may breach duty of care towards a child or young person or person at risk if they fail to act in the way a reasonable or diligent professional would have acted in the same situation.</p> <p>In relation to suspected child abuse, reasonable steps may include (but are not necessarily limited to): acting on concerns and suspicions of abuse as soon as practicable seeking appropriate advice or consulting with other professionals or agencies when the unsure of what steps to take, reporting the suspected child abuse to appropriate authorities such as Police or Child Protection, arranging counselling and/or other appropriate support for the child, providing ongoing support to the child and sharing information with other Personnel who will also be responsible for monitoring and providing ongoing support to the child or young person.</p>
<p>Reportable Conduct</p>	<p>Relates to the legal obligation to report conduct involving child abuse and misconduct under relevant State legislation (refer to the legislation applicable in the relevant jurisdiction).</p>
<p>Risk management</p>	<p>In the context of creating safe environments for Children, Young People and People at Risk, risk management consists of assessing and taking steps to minimise the risks of harm to Children, Young People and People at Risk</p>

	because of the action of a member of Personnel. Risk management includes planning the work of the Organisation to reduce or minimise situations where Children, Young People and People at Risk may be abused.
The Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission).	An independent inquiry established in 2013 by the Australian Government to examine and report upon responses by institutions to instances and allegations of child sexual abuse in educational institutions, religious groups, sporting organisations, state institutions and youth organisations. The findings provide recommendations to the Government on how to improve laws, policies, structures and practices to prevent such harm from re-occurring. https://www.childabuseroyalcommission.gov.au/
Sexual abuse	Sexual abuse occurs when an adult or a person of authority (e.g., older) involves a Child, Young Person or Person at Risk in any sexual activity. Perpetrators of sexual abuse take advantage of their power, authority or position over the Child, Young Person or Person at Risk at risk for their own benefit. It can include making sexual comments to a Child, Young Person or Person at Risk engaging the person to participate in sexual conversations over the internet or on social media, kissing, touching the person's genitals or breasts, oral sex or intercourse with the person. Encouraging a Child to view pornographic magazines, websites and videos is also sexual abuse. Engaging Children to participate in sexual conversations over the internet is also considered sexual abuse.
Safeguarding Children Governance Framework	The College's Safeguarding Children Governance Framework has been developed so that all the College's Personnel share the responsibility for keeping Children and Young People safe
Sexual exploitation	Sexual exploitation is a form of sexual abuse where offenders use their power, (physical, financial or emotional) over a Child, Young Person or Person at Risk or a false identity, to sexually or emotionally abuse them. It often involves situations and relationships where Children, Young People or People at Risk receive something (food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money etc.) in return for participating in sexual activities. Sexual exploitation can occur in person or online, and sometimes the Child, Young Person or Person at Risk may not even realise they are a victim.
Spiritual Abuse	Spiritual Abuse means the mistreatment of a person by actions or threats when justified by appeal to God, faith or religion. It Includes: using a position of spiritual authority to dominate or manipulate another person or group, using a position of spiritual authority to isolate a person from friends and family members, using biblical or religious terminology to justify abuse
United Nations Convention on the Rights of the Child	Is an international agreement setting out the civil, political, economic, social and cultural rights of every child, regardless of their race, religion or abilities. https://www.ohchr.org/en/professionalinterest/pages/crc.aspx

Volunteer	A person who is neither employed by the College nor legally obliged to work for WV, but who on free will and without expectation of payment or other remuneration, contributes their time, skill, knowledge, efforts and expertise to the College's work
Working with Children Check	The Working With Children Check (WWCC) is an Australian background check requirement, assessing the criminal record of those working or volunteering in child-related work.

17. RELATED POLICIES & SUPPORTING DOCUMENTS

Related Legislation	<p>This policy reflects obligations under the following legislation in New South Wales:</p> <ul style="list-style-type: none"> – Children and Young Persons (Care and Protection) Act 1998 (“Care and Protection Act”). – Child Protection (Working With Children) Act 2012 (“WWC Act”). – Children’s Guardian Act 2019 (“Children’s Guardian Act”). – Crimes Act 1900 (“Crimes Act”). – Children’s Guardian Amendment (Child Safe Scheme) Bill 2021 (Child Safe Scheme).
Related Policies and Procedures	<p>Staff must read and comply with this policy and the following related policies and procedures:</p> <ul style="list-style-type: none"> – Staff Code of Conduct. – Work Health and Safety Statement – Student Bullying, Harassment and Discrimination Policy – Complaints Handling Policy and Procedures. – Australian Province Code of Conduct – Child Safeguarding Complaints Management Guidelines – Child Safeguarding Procedures
Related Documents	<p>NSW Government Resources</p> <ul style="list-style-type: none"> – NSW Mandatory Reporter Guide (DCJ): https://www.dcj.nsw.gov.au/ – NSW Child Safe Standards Guide (OCG): https://ocg.nsw.gov.au/child-safe-scheme – Office of the Children's Guardian website: https://ocg.nsw.gov.au

	- Department of Communities and Justice: https://www.dcj.nsw.gov.au/
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18. DOCUMENT CONTROL

POLICY	Child Safeguarding Policy
RESPONSIBLE OFFICER	Principal
CONTACT OFFICER	Deputy Principal Students (Senior School) Director of Regis (Regis Campus) Chief Risk Officer
APPROVED BY	Chair of the Board
VERSION NUMBER	5.0
SUPERSEDED VERSION NUMBER	4.0
EFFECTIVE DATE	17/12/2025
NEXT REVISION DATE	Dec 2026