



## **POLICY STATEMENT:**

Ballarat Grammar has developed the following Student Safety and Wellbeing policy. This policy is an overarching document that provides key elements of our approach to protecting students, including children, from abuse.

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

It is designed to be published on our public website as well as communicated through other mediums such as newsletters, our annual report and in induction and welcome packs for members of the Board of Directors, Staff and Volunteers.

The protection of all students is in accordance with any applicable State and Commonwealth laws and staff and volunteers are advised of their obligations under those laws.

**Ballarat Grammar is committed to zero tolerance of child abuse in every form and all allegations and safety concerns will be treated very seriously and consistently with our robust policies and procedures. All staff, volunteers and members of our community have a duty of care to protect the safety, health and wellbeing of all children in their care.**

**As a school with a diverse population, this includes students with a disability, Aboriginal and Torres Strait Islander children and children from culturally and linguistically diverse backgrounds.**

### **Rationale –**

In accordance with Ministerial Order 1359 "Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding premises", Ballarat Grammar endeavours to provide a safe school environment (see Appendix 1 – School Environments for an overview of these across the School) and has clear procedures for a culture of student safety. Broader Safety issues arising from our common law duty of care are dealt with through our student duty of care statements and risk management procedures.

This policy should be read in conjunction with all of the School's student safety strategies, policies and procedures and not independently.

### **Part 1- Objectives**

1. This policy provides the framework for:
  - 1.1 The development of work systems, practices, policies and procedures that promote student safety within the School;
  - 1.2 The creation of a positive and robust student safety culture;
  - 1.3 The promotion and open discussion of student safety issues within the School; and
  - 1.4 Compliance with all laws, regulations and standards relevant to student safety in Victoria.





## Part 2- Statement of Commitment to Student Safety

1. Child abuse includes sexual offences, grooming, physical violence, serious emotional or psychological harm, serious neglect and a child's exposure to family violence. Ballarat Grammar is committed to the protection of all students from all forms of child abuse and demonstrates this commitment through the implementation of comprehensive Student Safety policies and procedures designed to keep students safe.
2. At Ballarat Grammar we have a zero tolerance for child abuse and are committed to acting in student's best interests and keeping them safe from harm. The School regards its student safety responsibilities with the utmost importance and as such, is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations and maintain a student safe culture.
3. Ballarat Grammar's student safety action is made up of work systems, practices, policies and procedures designed to maintain a student-safe environment and to embed an organisational culture of student safety within the whole school community.

## Part 3- Student Safe Values and Principles

1. Every student at Ballarat Grammar has the right to be safe and the welfare and best interests of the student are to be of utmost importance. We continue to achieve this by:
  - 1.1 Respecting the views of each student and their privacy;
  - 1.2 Outlining clear expectations for appropriate behaviour with student, in our *Student Safety Code of Conduct* and *Professional Boundaries* policy;
  - 1.3 Providing and creating a school culture that supports the safety for each student within our care;
  - 1.4 Promoting student safety awareness for all members of our community along with open discussions about student safety issues;
  - 1.5 Ensuring students from culturally or linguistically diverse backgrounds have access to special care and support including those who identify as Aboriginal or Torres Strait Islander;
  - 1.6 Ensuring students who have any kind of disability have access to special care and support;
  - 1.7 Ensuring that all members of the School Community understand that student safety and protection is everyone's responsibility;
  - 1.8 Ensuring appropriate procedures are in place to screen all staff, Direct Contact Volunteers\*\*, Third Party Contractors and External Education Providers who come into contact with our students. (Refer to our Student Safe recruitment practices in Part 6- Staff Selection below);
  - 1.9 Ensuring mandatory training for all members of the Board of Directors, Ballarat Grammar staff, BGS Educational Services, and members of the Foundation;
  - 1.10 Clear and easily accessible procedures for responding to alleged or suspected incidents of child abuse; and
  - 1.11 Complying with all laws, regulations and standards relevant to child protection in Victoria.

*\*\* Direct Contact Volunteers are those volunteers who are involved in providing support, guidance and supervision directly to students and could potentially have direct contact with students during the normal course of providing the volunteer service.*

*The Worker Screening Act 2020 (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.*

*Examples of Direct Contact Volunteer activities may include volunteers involved in School camps and excursions, coaching sporting teams or assisting in learning activities.*

#### **Part 4- Student Safety**

1. Ballarat Grammar is committed to the effective implementation of our Student Safety policies and procedures and ensuring that it is appropriately reviewed and updated. We adopt a risk management approach by identifying key risk indicators and assessing student safety risks based on a range of factors including the nature of the School's activities, physical and online environments and the characteristics of the student body.
2. Our Student Safety policies and procedures relate to all aspects of protecting students from abuse and establishes work systems, practices, policies and procedures to protect students from abuse.
3. Creation and maintenance of Ballarat Grammar's student-safe environment and culture occurs through:
  - 3.1 Clear information to all stakeholders as to what constitutes child abuse and associated key risk indicators;
  - 3.2 Education and support for responding to and reporting allegations of child abuse;
  - 3.3 Strategies to support, encourage and enable staff, Volunteers, Third Party Contractors, External Education Providers, parents and students to understand, identify, discuss and report student safety matters;
  - 3.4 Recruiting procedures that ensure robust screening of all those engaged in work at Ballarat Grammar;
  - 3.5 Procedures for reporting reportable conduct and/or misconduct;
  - 3.6 Embedded education in our curriculum and wellbeing pastoral care program designed to empower students and keep them safe;
  - 3.7 Policies with respect to cultural diversity and students with disabilities;
  - 3.8 Continuous professional development for all embedding the understanding that student safety is the responsibility of every member of staff at Ballarat Grammar;
  - 3.9 Information regarding the steps to take after a disclosure of abuse to protect, support and assist students;
  - 3.10 Guidelines with respect to record keeping and confidentiality;
  - 3.11 Policies to ensure compliance with all relevant laws, regulations and standards (including the Victorian Child Safe Standards);
  - 3.12 A system for continuous review and improvement;
  - 3.13 All staff are to wear Ballarat Grammar name tags or their Ballarat Grammar embroidered uniform and all visitors to the School must sign in at reception and wear a yellow lanyard with their visitors sign in pass attached;
  - 3.14 Where appropriate gates will be locked during the day by using a swipe card operation;
  - 3.15 Areas where line of sight is obscured will be evaluated for risk factors;





- 3.16 Staff should always place themselves in an appropriate location, so they are not in isolation with a student;
- 3.17 Continued due diligence will be managed through the School's Risk Management Matrix; and
- 3.18 Close monitoring of student attendance is required in all areas of the School.
4. The School environment encompasses continual monitoring of the School environments through the Risk Management Committee occurs on a regular basis and a risk analysis and management plan must be conducted for all off campus activities.
5. The School's *Student Safety Code of Conduct* outlines acceptable and unacceptable behaviour when dealing with students and young people in our care. Regular reminders and updates will be provided to all members of our community using the School's various communication resources. This will allow for the monitoring and adherence to the policy or statements appropriate.
6. As a part of Ballarat Grammar's induction process, all staff and Direct Contact Volunteers are required to complete a selection of training modules on the content of our Student Safety policies and procedures.
7. All staff, Direct Contact Volunteers and members of the Board of Directors are provided with additional, ongoing student safety training at least annually.
8. Staff, Volunteers, Third Party Contractors and External Education Providers are supported and supervised by the School's Student Safeguarding Officers to ensure that they are compliant with the School's approach to student safety.

## Part 5- Responsibilities

1. Society as a whole shares responsibility for promoting the safety and protection of students from abuse. In the School context, all members of the School community have their role to play – teachers, staff, parents/carers, volunteers and students. That said, the School's senior staff team are committed to 'leading from the front' and engaging in a preventative, proactive and participatory approach to student safety issues.
2. Students are encouraged to take an active role in developing and maintaining a student safe environment at the School and are provided with opportunities to contribute and give feedback in the development of the School's policies and practices. Students are also made aware of the avenues available to them to report or disclose abuse or concerns for their safety or the safety of others.
3. At Ballarat Grammar all members of the Board of Directors and staff, as well as Volunteers, have a shared responsibility for contributing to the safety and protection of students. Specific responsibilities include:
  - 3.1 **Board of Directors-** Each member of the Board of Directors is required to ensure that appropriate resources are made available to allow the School's Student Safety policies and procedures to be effectively implemented within the School and are responsible for holding the Headmaster and senior staff team accountable for effective implementation.
  - 3.2 **The Headmaster-** The Headmaster is responsible, and will be accountable for, taking all practical measures to ensure that this Student Safety policies and procedures are implemented effectively and that a strong and sustainable student safety culture is maintained within the School.
  - 3.3 **The School's Student Safeguarding Officers-** A number of senior staff members are nominated as the School's Student Safeguarding Officers. Our Student Safeguarding Officers receive additional training with respect to student safety issues. They are the first point of contact for raising student safety concerns within the School. They are also





responsible for championing student safety within the School and assisting in coordinating responses to student safety incidents.

- 3.4 **Staff Members-** All staff are required to be familiar with the content of our Student Safety policies and procedures and their legal obligations with respect to the reporting of child abuse. It is each individual's responsibility to be aware of the key risk indicators of child abuse, to be observant, and to raise any concerns they may have relating to child abuse with one of the School's Student Safeguarding Officers.
- 3.5 **Direct Contact Volunteers-** All Direct Contact Volunteers, as defined in this policy, are required to be familiar with the content of our Student Safety policies and procedures and their legal obligations with respect to the reporting of child abuse. It is each individual's responsibility to be aware of key risk indicators of child abuse, to be observant, and to raise any concerns they may have relating to child abuse with one of the School's Student Safeguarding Officers.
- 3.6 **Indirect Contact Volunteers-** Indirect Contact Volunteers (or Indirect Volunteers) are those Volunteers who are involved in provide support and services whilst not directly assisting a specific group of students. Examples of Indirect Contract Volunteer activities may include assisting with School administrative functions.
- 3.7 **Third Party Contractors-** All Third-Party Contractors (service providers) engaged by the School are responsible for contributing to the safety and protection of students in the School environment. Third Party contractors include, for example, maintenance and building personnel, consultants, casual teachers, tutors, sports coaches and school 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 School, but have an agreement with the School to use the School's facilities.
- 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 a school is legally required to screen.

\*\* *The Worker Screening Act 2020 (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.*
- 3.9 **Indirect Contact Contractors-** Indirect Contact Contractors are those contractors who do not meet the definition of 'Direct Contact Contractor'. All service providers engaged by the School are required by the School to be familiar with our Student Safety policies and procedures. The School may include this requirement in the written agreement between it and the service provider.
- 3.10 **External Education Providers-** An External Education Provider is any organisation that the School has arranged to deliver a specified course of study that is part of the





curriculum, to a student or students enrolled at the School. The delivery of such a course may take place on School premises or elsewhere. All External Education Providers engaged by the School are responsible for contributing to the safety and protection of students in the School environment. All External Education Providers engaged by the School are required by the School to be familiar with our Student Safety policies and procedures. Ballarat Grammar may include this requirement in the written agreement between it and the External Education Provider.

## Part 6- Staff Selection

1. Ballarat Grammar endeavours to ensure that the selection process for recruitment of new staff and volunteers is rigorous in regard to an applicant's suitability to undertake student-connected work. This procedure outlines the steps involved in the recruitment process that ensure natural justice for all applicants seeking employment or voluntary work at the School.
2. Procedures:
  - 2.1. **Position Descriptions-** As each employment vacancy arises, the position description undergoes a review and includes the statement emphasising zero tolerance (in bold on page one of this document). Details of essential or relevant qualifications, experience and attributes in relation to student safety will also be included. Position descriptions will be available to all applicants, both electronically via the website and in hard copy by request.
  - 2.2. **Shortlisting of Applicants-** Shortlisted applicants will be asked to confirm that they have read and understood the position description in the first instance and that they understand the student safety practices and code of conduct of the School. Background searches will be conducted using, for example, Google, Facebook and LinkedIn. Applicants will be asked to provide the contact details of at least two referees, a current or most recent employer and a direct supervisor/manager.
  - 2.3. **Interview Process-** Interviewees will be advised that the selection process will involve a rigorous background check. Proof of current Victorian Institution of Teaching (VIT) registration, a current Working with Children Check (WWC Check) or equivalent will be required, as well as proof of qualifications, including original transcripts, and registrations, as appropriate. The interview panel will emphasise that all staff are required to have the duty of care to protect the safety, health and wellbeing of all students in their care at all times. Any apparent gaps in the employment history of an interviewee will be thoroughly investigated.
  - 2.4. **Reference Checks-** Reference checks will include:
    - 2.4.1. Confirmation that previous employment details provided by the interviewee are accurate;
    - 2.4.2. Questions regarding any direct supervision of students by the interviewee in their current or previous employment;
    - 2.4.3. Asking the referee if they would employ the interviewee again;
    - 2.4.4. Shortlisted applicants are required to submit two forms of personal identification, and the Human Resources Manager will ensure that names and addresses are the same as those provided by the applicant; and
    - 2.4.5. It is the responsibility of the Human Resources Department to ensure all details are kept on the employee's staff file on Synergetic.
  - 2.5. **Interviews-** The interview process is a very important step in selecting the right person for Ballarat Grammar and in identifying any people who may pose a risk to students in our care.





- 2.5.1. The interview process should include sufficient time to plan and prepare for the interview, forming the panel with the right mix of staff experience and skills to carry out the interview, ensuring that all panel members are clear on what the position requires. An open-ended style of behavioural-based questioning should enable the interviewers to assess the applicant's values, attitudes and understanding of professional boundaries and accountability. Some useful questions may include:
  - 2.5.1.1. 'Tell us about why you want to work with children?'
  - 2.5.1.2. 'Describe a time when you had to manage a child whose behaviour you found challenging?'
  - 2.5.1.3. 'Tell us about a time when you had to comfort a distressed child?'
- 2.5.2. Staff are encouraged to take notice of their own thoughts and feelings when interacting with the applicant. Ask for more information if the applicant does not provide sufficient information in their responses.
- 2.5.3. Did you notice any warning signs such as:
  - 2.5.3.1. Unexplained lengthy gaps in employment history;
  - 2.5.3.2. The applicant says they do not value or 'need' supervision; and/or
  - 2.5.3.3. The applicant is evasive or inconsistent in their answers.
- 2.6. **Employment Contract-** Each letter of offer and letter of acceptance contains the statement emphasising zero tolerance. New staff sign the letter of acceptance to acknowledge their acceptance of the position and the expectations of the School, in particular, in relation to student safety. This includes a six-month review on all aspects of their role.
- 2.7. **New Staff Induction-** The Human Resources Department is responsible for ensuring that all new staff are introduced to all aspects and expectations of the School. This includes directing them to the Staff Portal as an important source of information about what is required of all staff, particularly a thorough understanding of policies and procedures, including Child Safe Standards. All staff will continue to be educated on their role in ensuring Ballarat Grammar remains committed to zero tolerance for child abuse. All staff are required to have a VIT Registration, valid WWC Check or equivalent before commencing work onsite.
- 2.8. **Financial Induction-** All new staff are required to undertake a financial induction and medical health check. This induction involves the staff member working through a check list that they sign and submit to the relevant area manager following this induction. The check list includes a list of particular policies that they must be aware of and adhere to, including the *Student Safety and Wellbeing* policy.
- 2.9. **Volunteers-** Refer to the *Student Safety and Wellbeing* policy and *Code of Conduct*. Proof of current Working with Children certification is required and a check list must be signed and submitted to acknowledge that the *Student Safety and Wellbeing* policy has been read and understood.

## Part 7- Reporting Student Safeguarding Concerns

1. Our Student Safety policies and procedures provide detailed guidance for members of the Board of Directors, 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 our School's nominated Student Safeguarding Officers. It also contains detailed procedures with respect to the reporting of child abuse incidents to relevant authorities.
2. Staff, Third Party Contractors, External Education Providers, Volunteers, students, parents/guardians and other community members who have concerns that a student may be





- subject to abuse or grooming are asked to contact the School's Senior Student Safeguarding Officer, Mark Warwick, by emailing [Mark.Warwick@bgs.vic.edu.au](mailto:Mark.Warwick@bgs.vic.edu.au) or phoning 03 5338 0847.
3. Communications will be treated confidentially on a "need to know basis".
  4. **Whenever there are concerns that a student is in immediate danger the Police should be called on 000.**

#### Part 8- Review

1. Ballarat Grammar is committed to the continuous review and improvement of all its operations, including this policy.
2. It is the responsibility of the Senior Student Safeguarding Officer to regularly monitor and annually review the effectiveness of the Student Safety policies to ensure they are working in practice and revise the policy when required.
3. It is the responsibility of the Senior Student Safeguarding Officer along with the Director of Risk, Compliance and Legal Services to engage with students, parents and the broader community in relation to the review of the School's Student Safety policies.

#### Part 9- Breach of Policy

1. All staff, volunteers and those engaged by Ballarat Grammar are expected to enact this policy in support of student and community learning, health, safety and wellbeing.
2. Any breach of a Student Safety policy will be taken seriously and immediately actioned and followed up by the School, this includes any necessary advice and/or notification to external bodies.





**Appendix 1 – School Environments**

	<u>CEEEd</u>	JS	MT ROWAN	SS	CITY CITE	WCPA	BOARDING House
Teachers/CRT	●	●	●	●	●	●	●
Teacher Assistants	●	●	●	●	●	●	●
After Care Staff	●	●	●			●	
Camp Aust Staff	●	●	●	□		●	
Maintenance staff	●	●	●	●	●	●	●
Transport staff & other drivers	●	●	●	●	●	●	●
Health Ctr Staff	●	●	●	●		●	●
Music Staff	●	●	●	●		●	●
Admin Staff	●	●	●	●	●	●	●
BG Ed Services Staff	●	●	●	●	●	●	●
Farm staff	●	●	●	●		●	●
Parent helpers	●	●	●	●	●	●	●
GAP students	●	●	●	●	●	●	●
PST	●	●	●	●	●	●	●
Visitors	●	●	●	●	●	●	●
Family	●	●	●	●	●	●	●
Private Tutors		●	●	●	●	●	●
VCAL				●		●	●
Canteen helpers/Kitchen	●	●	●	●		●	●
Indigenous Program		●	●	●		●	●
Work Experience	●	●	●	●	●	●	●
Exam Invigilators				●		●	
Swimming Instructors		●	●	●			
School Competitions		●	●	●		●	
Sport		●	●	●			●
Contractors/Sub-contractors	●	●	●	●	●	●	●
Careers Expo		●		●		●	
Community Service		●	●	●		●	●
Board of Directors	●	●	●	●	●	●	●
Exchanges		●	●	●	●	●	●
Guardians		●	●	●		●	●
Emergency Services	●	●	●	●	●	●	●
Home Stay		●		●	●	●	●
External Users		●	●	●	●	●	●
Virtual		●	●	●	●	●	●
International trips		●	●	●	●	●	●
Psychologist appointments		●	●	●	●	●	●
SBA/VET External placements				●		●	●
OEG/Outdoor Ed/Camps		●	●	●		●	●
Excursion venues	●	●	●	●	●	●	●
Incursion staff/visitors	●	●	●	●	●	●	●
Public transport	●	●	●	●			●
Health Appointments	●	●	●	●	●		●