



# Child Safety Policy

**POLICY CATEGORY: CHILD SAFETY**

## POLICY CONTROL INFORMATION

POLICY RISK RATING	VERSION	OWNER	PUBLICATION
High	2.1	Deputy Principal	Internal (eVI, School Community (eVI) and Public (website)
MGGS APPROVER	MGGS APPROVAL DATE	COUNCIL APPROVAL DATE	NEXT REVIEW DATE
Principal	14 June 2022	21 June 2022	June 2023

## Table of Contents

<b>1.</b>	<b>POLICY OBJECTIVE .....</b>	<b>3</b>
1.1.	Scope .....	3
<b>2.</b>	<b>POLICY SECTION .....</b>	<b>3</b>
2.1.	Statement of Commitment to Child Safety .....	3
2.2.	Application .....	4
2.3.	Child Safe Principles .....	4
2.4.	Child Safety Program .....	5
2.5.	Responsibility .....	5
2.6.	Our Children .....	6
2.7.	Our Staff and Volunteers .....	7
2.8.	Contractors .....	8
2.9.	External Education Providers .....	8
2.10.	Training and education .....	8
2.11.	Recruitment .....	9
2.12.	Supporting Our School Community .....	10
2.13.	Support for Affected Students .....	11
2.14.	Fair Procedures .....	11
2.15.	Privacy and Confidentiality .....	11
2.16.	Legislative Responsibilities .....	11
2.17.	Child Protection allegations, concerns and complaints .....	12
2.18.	Risk Management .....	13
<b>3.</b>	<b>POLICY COMPLIANCE .....</b>	<b>13</b>
3.1.	Policy Breach .....	13
3.2.	Policy Compliance monitoring .....	13
<b>4.</b>	<b>DEFINITIONS .....</b>	<b>13</b>
<b>5.</b>	<b>RELATED POLICIES, PROCEDURES AND LEGISLATION .....</b>	<b>15</b>
5.1.	MGGs policy and procedure alignment .....	15
5.2.	Related legislation .....	15
<b>6.</b>	<b>POLICY REVIEW AND APPROVAL .....</b>	<b>16</b>

## 1. POLICY OBJECTIVE

Melbourne Girls Grammar (MGGS) is committed to the safety of every child enrolled as a student at our school. Children have the right to a safe environment at school. We support and respect all children, as well as our staff and volunteers. This policy provides an overview of the key elements of our approach to child safety at MGGS. This policy provides the framework for:

- The implementation of work systems, practices, policies and procedures that promote child protection within the School.
- The creation of a positive and robust child protection culture.
- The promotion and open discussion of child protection issues within the School.
- Complying with all laws, regulations and standards relevant to child protection in Victoria.

Our School policies and procedures have been developed to create a culturally safe and inclusive environment and meet the needs of Aboriginal and Torres Strait Islander children, young people and their families.

### 1.1. Scope

This policy applies to the following:

- all Melbourne Girls Grammar School staff
- all students
- all parents/guardians
- all visitors
- all volunteers and contractors (whether or not they work in direct contact with students)
- Council advisory members

This policy provides procedures and applies to all school activities during and outside of school hours. This includes school activities that are occurring on school campus, boarding residences, offsite, online, co-curricular, sport activities and programs, excursions, camps, interstate and overseas travel. In the application and implementation of this policy full consideration is required regarding the needs of our students including culture, diversity and age.

The MGGS school environment is any physical or virtual place made available or authorised by MGGS for use by a child during or outside school hours and includes:

- our Morris Hall Campus in Caroline Street, South Yarra
- our Merton Hall Campus and ELC and Boarding House facilities in Anderson Street, South Yarra
- online school environments including email and intranet systems
- other locations provided by MGGS for a child's use, including locations used for school camps, sporting events, excursions, competitions and other events.

This policy informs our school community of everyone's obligations to act safely and appropriately towards children and guides our processes and practices for the safety and wellbeing of students across all areas of our work.

## 2. POLICY SECTION

### 2.1. Statement of Commitment to Child Safety

- We are committed to the safety, participation, empowerment and protection of all children/ students in our care. We are committed to providing a child-safe and child-friendly environment, where children and young people are safe and feel safe and are able to actively participate in decisions that affect their lives.
- We have zero tolerance for child abuse and are committed to the protection of children from all forms of child abuse. All allegations and safety concerns will be treated seriously and consistently

with our robust policies and procedures. Our policies and procedures will provide the name and contact details of staff who have specific responsibilities in relation to child safety and who may receive reports of suspicion of child abuse. Child abuse includes sexual offences, grooming, physical violence, serious emotional or psychological harm, serious neglect and a child's exposure to family violence.

- We have legal and moral obligations to contact authorities when we are worried about a child's safety, which we follow rigorously.
- We are committed to proactively preventing child abuse, identifying risks early and removing and reducing these risks. When child safety concerns are raised or identified, we treat these seriously and respond promptly and thoroughly.
- We have robust human resources and recruitment practices for all staff and volunteers.
- We are committed to regularly training and educating our staff and volunteers on child abuse risks.
- We support and respect all children, as well as our staff and volunteers. We are committed to the emotional, physical and cultural safety of all children and to providing a safe environment for their learning.
- We support and respect all students and welcome and promote diversity and tolerance in the School. We do this by acknowledging and celebrating people from all cultural backgrounds and support their ability to express their culture and enjoy their cultural rights. In particular, the School promotes the cultural safety, participation and empowerment of:
  - Aboriginal and Torres Strait Islander children and their families
  - International students
  - Children from culturally and/or linguistically diverse backgrounds and their families
  - Children who express a full range of sexual orientation and gender identity and their families
  - Neurodiverse children, children with disabilities, and children who are vulnerable and their families.
- Inappropriate or harmful behaviour targeting students based on these or other characteristics, such as racism or homophobia, are not tolerated at our school, and any instances identified will be addressed with appropriate consequences.
- Child safety is a shared responsibility. Every person involved in our school has an important role in promoting child safety and wellbeing and promptly raising any issues or concerns about a child's safety.
- We are committed to regularly reviewing our child safe practices, and seeking input from our students, families, staff, and volunteers to inform our ongoing strategies.
- We are committed to take action to ensure a child safe culture is championed and modelled across the school.
- We have specific policies, procedures and training in place that support our leadership team, staff and volunteers to achieve these commitments.

## **2.2. Application**

The policy is to be applied in conjunction with provisions in the *Child Safety Code of Conduct* and all other relevant child safety and protection policies and procedures.

## **2.3. Child Safe Principles**

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

- All children have the right to be safe.
- The welfare and best interests of the child are paramount.
- The views of the child and a child's privacy must be respected.

- Clear expectations for appropriate behaviour with children are established in the *Child Safety Code of Conduct*.
- The safety of children is dependent upon the existence of a child-safe culture.
- Child safety awareness is promoted and openly discussed within our School community.
- Procedures are in place to screen all staff, external education providers, contractors and volunteers who have direct contact with children.
- Child safety and protection is everyone's responsibility.
- Child safety/protection training is mandatory for all School Council members, staff and nominated volunteers as per our *Volunteer Management Procedure*.
- Procedures for responding to alleged or suspected incidents of child abuse are simple and accessible for all members of the School community, via the *Child Safety Response and Mandatory Reporting Procedure* on MGGS's [Policy page](#) of eVI or MGGS's external website.
- Children from culturally or linguistically diverse backgrounds have the right to special care and support including those who identify as Aboriginal or Torres Strait Islander.
- Children who have any kind of disability have the right to special care and support.

## 2.4. Child Safety Program

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

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

- Clear information as to what constitutes child abuse and associated key risk indicators.
- Clear procedures for responding to and reporting allegations of child abuse.
- Strategies to support, encourage and enable staff, students, parents and carers, external education providers, contractors and volunteers to understand, identify, discuss and report child protection matters.
- Procedures for recruiting and screening School Council members, staff (including casual, emergency relief, part-time and full-time) and long-term contractors and volunteers.
- Wellbeing strategies designed to empower students and keep them safe.
- Policies with respect to cultural diversity and students with disabilities.
- A child protection/safety training program.
- Information regarding the steps to take after a disclosure of abuse to protect, support and assist children.
- Guidelines with respect to record keeping and confidentiality.
- Policies to ensure compliance with all relevant laws, regulations and standards including the National Child Safe Standards, Ministerial Order 706 and Ministerial Order 1359.
- A system for oversight, monitoring, continuous improvement and review.

## 2.5. Responsibility

Child safety and protection is everyone's responsibility. The school leadership team (comprising the Principal and School Council) is responsible for ensuring that a strong child safe culture is created and maintained, and that policies and practices are effectively developed and implemented in accordance with Ministerial Order 1359. These strategies will give the highest priority to the promotion and protection of a child's safety, health, development, education and wellbeing.

The Principal will:

- ensure effective child safety and wellbeing governance, policies, procedures, codes and practices are in place and followed

- model a child safe culture that facilitates the active participation of students, families and staff in promoting and improving child safety, cultural safety and wellbeing
- enable inclusive practices where the diverse needs of all students are considered
- reinforce high standards of respectful behaviour between students and adults, and between students
- promote regular open discussion on child safety issues within the School community including at leadership team meetings, staff meetings and School Council meetings
- facilitate regular professional learning for staff and volunteers (where appropriate) to build deeper understandings of child safety, cultural safety, student wellbeing and prevention of responding to abuse
- create an environment where child safety complaints and concerns are readily raised, and no one is discouraged from reporting an allegation of child abuse to relevant authorities
- oversee the programs for child safety including the culture, compliance, incident and reporting programs, and is the first point of contact for raising child safety concerns within MGGS
- champion child safety within the School and assist in co-ordinating responses to child protection incidents, including overseeing compliance with all mandatory reporting.

## 2.6. Our Children

Our strategies will empower children who are vital and active participants in our organisation and provide them with opportunities to give us feedback and ensure that they feel safe and comfortable in reporting concerns or allegations of abuse.

Our students are also informed of their rights to participate in a safe and supportive educational environment, and have formal and informal avenues for feedback, confidential disclosure, and reporting.

The importance of friendships is recognised and support from peers is encouraged, to help children and young people feel safe and be less isolated.

The School has arranged age-appropriate training and education programs to inform students about sexual abuse prevention and related information.

The School provides students with opportunities to participate and is responsive to their contributions in a way that strengthens confidence and engagement.

The School is committed to ensuring students' families participate in decisions affecting their child, where appropriate. This may include participation in reporting and responding to allegations of abuse.

The School is committed to raising awareness and providing access to the Child Safe Standards and the School's associated child safe policies and procedures with our students, families and the community.

To support child safety and wellbeing at MGGS, we work to create an inclusive and supportive environment that encourages students and families to contribute to our child safety approach and understand their rights and their responsibilities.

Respectful relationships between students are reinforced and we encourage strong friendships and peer support at MGGS to ensure a sense of belonging through our Healthy Relationships Program, Student Wellbeing Program, Student Code of Conduct and our MGGS values.

We inform students of their rights through the MGGS Curriculum Plan and ongoing awareness and provide them the skills and confidence to recognise unsafe situations with adults or other students and to speak up and act on concerns relating to themselves or their peers. We ensure our students know who to talk to if they are worried or feeling unsafe and we encourage them to share concerns with a trusted adult at any time, including the School Counsellors. Students and families can also access information on how to report concerns via eVI, the student diary, parent handbook and our external website.

When MGGS is gathering information in relation to a complaint about alleged misconduct or abuse of a child, we will listen to the complainant's account and take them seriously, check our understanding of the

complaint, support the student and keep them (and their parents and carers, as appropriate) informed about progress.

Our families and the School community have an important role in monitoring and promoting children's safety and wellbeing and helping children to raise any concerns.

To support family engagement, at MGGS we are committed to providing families and community with accessible information about our School's child safe policies and practices and involving them in our approach to child safety and wellbeing.

We will create opportunities for families to have input into the development and review of our child safety policies and practices and encourage them to raise any concerns and ideas for improvement. We do this by various methods, including communicating regarding our Child Safe policies and seeking feedback from families and the community via eVI, Messenger articles, online feedback forms, School Council, Sub-committees of School Council and Parent Association meetings. Newsletters/Messenger articles) will inform families and the school community about any significant updates to our child safety policies or processes, and strategies or initiatives that we are taking to ensure student safety. All of our child safety policies and procedures will be available for students and parents via eVI and our [external website](#).

## **2.7. Our Staff and Volunteers**

This policy guides our staff and volunteers on how to behave when working and interacting with children in our organisation.

All staff and volunteers will:

- Participate in child safety and wellbeing induction and training provided by the School or the Department of Education and Training, and always follow the School's child safety and wellbeing policies and procedures.
- Act in accordance with our [Child Safety Code of Conduct](#) as well as their legal obligations with respect to the reporting of child abuse.
- Identify and raise concerns about child safety issues in accordance with our [Child Safety Response and Mandatory Reporting Procedure](#), including following the [Four Critical Actions for Schools](#).
- Ensure students' views are taken seriously and their voices are heard about decisions that affect their lives.
- Implement inclusive practices that respond to the diverse needs of students.
- Be trained and supported to effectively implement our *Child Safety Policy*.
- Receive training and information to recognise key indicators of child harm including harm caused by other students.
- Receive training and information to respond effectively to issues of child safety and wellbeing and support colleagues who disclose them.
- Receive training and information on how to build culturally safe environments for students.
- Facilitate child-friendly ways for children and young people to express their views, participate in decision making and raise their concerns.
- Identify and mitigate risks in the online and physical environments without compromising a child's right to privacy, access to information, social connections and learning opportunities.

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. All staff and volunteers must raise any concerns they may have relating to child abuse with the Principal or Deputy Principal Where the concern relates to the Principal or Deputy Principal, they should report to the Chair of the School Council.

We do not distinguish between direct and indirect volunteers as all volunteers on School premises may have contact with students, giving rise to a duty of care to protect our students. Volunteers should not be left alone with students, but our policy and procedures will be designed assuming this may inadvertently occur. MGGS will ensure that volunteers are aware of the *Child Safety Policy* and *Child Safety Code of Conduct*. Please refer to the *Volunteer Management Procedure* for the *Child Safety Volunteer Agreement*.

## School Council

In performing the functions and powers given to them under the *Education and Training Reform Act 2006*, School Council members will:

- champion and promote a child safe culture with the broader school community
- ensure that child safety is a standing agenda item at School Council meetings
- undertake annual training on child safety
- approve updates to, and act in accordance with the *Child Safety Code of Conduct* to the extent that it applies to School Council members
- when hiring School Council members, ensure that selection, supervision and management practices are child safe

## Specific staff child safety responsibilities

MGGS has a Child Safety Team to implement our child safety policies and practices, be the first point of contact for child safety concerns or queries and co-ordinate responses to child safety incidents.

- The Deputy Principal is responsible for monitoring MGGS's compliance with the *Child Safety Policy*. Anyone in our school community should approach the Deputy Principal if they have any concerns about MGGS's compliance with the Child Safety Policy.
- The Executive Director, Marketing and Community Engagement is responsible for informing the School community about this policy, and making it publicly available.
- Other specific roles and responsibilities are named in other child safety policies and procedures, including the *Child Safety Code of Conduct*, *Child Safety Response and Mandatory Reporting Procedure* and the *Child Safety Strategy*.

Child Safety matters are discussed and managed as required at weekly Executive Team meetings, quarterly OH&S Committee meetings and quarterly Student Safety Committee meetings. The Student Safety Committee provides an opportunity for students to provide input into MGGS Child Safety.

The MGGS Child Safety Risk register is updated annually by the Child Safety Team and reported annually to the OH&S Committee, Executive Team, Audit and Risk Management Committee, Property Committee and School Council.

### 2.8. Contractors

All contractors engaged by MGGS are responsible for contributing to the safety and protection of children in the School environment. Contractors include outsourced maintenance and building services, consultants, catering providers and School cleaners. This also includes extra-curricular teachers and instructors who are engaged by students and their families directly, rather than MGGS, but have an agreement with MGGS to use MGGS's facilities. All contractors engaged by MGGS are required to be familiar with the *Child Safety Policy*, *Child Safety Code of Conduct* and *Child Safety Response and Mandatory Reporting Procedure*. MGGS will also include this requirement in its written agreement with third-party contractors.

### 2.9. External Education Providers

An external education provider is any organisation that MGGS has arranged to deliver a specified course of study that is part of the curriculum, to a student or students enrolled at MGGS. The delivery of such a course may take place on MGGS premises or elsewhere. All external education providers engaged by MGGS are responsible for contributing to the safety and protection of children in the School environment. All external education providers engaged by MGGS are required to be familiar with our *Child Safety Policy* and the *Child Safety Code of Conduct*. MGGS will include this requirement in its written agreement with external education providers.

### 2.10. Training and education

Training and education are important to ensure that everyone at MGGS understands that child safety is everyone's responsibility. Our organisational culture aims for all staff and volunteers (in addition to parents/carers and children) to feel confident and comfortable in discussing any allegations of child abuse or



child safety concerns. New employees, volunteers and contractors are briefed on commencement and provided with information to ensure they understand MGGS's commitment to child safety and that everyone has a role to play in protecting children from abuse, as well as checking that their behaviour towards children is safe and appropriate (please refer to the *Child Safety Code of Conduct* to understand appropriate behaviour further).

Ongoing training and education are essential to ensuring that staff understand their roles and responsibilities and develop their capacity to effectively address child safety and wellbeing matters. Our staff will participate in a range of training and professional learning to equip them with the skills and knowledge necessary to maintain a child safe environment. Staff training will be delivered at least annually and will include guidance on:

- our School's child safety and wellbeing policies, procedures and practices
- completing the [Protecting Children – Mandatory Reporting and Other Legal Obligations](#) online module annually
- recognising indicators of child harm including harm caused by other children and students
- responding effectively to issues of child safety and wellbeing and supporting colleagues who disclose harm
- how to build culturally safe environments for children and students
- information sharing and recordkeeping obligations
- how to identify and mitigate child safety and wellbeing risks in the school environment.

The training and awareness requirements for MGGS volunteers depend on the type and scope of volunteering and this is detailed in the *Volunteer Management Procedure*. Training and awareness will be tailored where possible according to specific roles and responsibilities. All volunteers will be required to read and acknowledge the *Child Safety Policy, Code of Conduct and Response and Mandatory Reporting Procedure* and nominated volunteers are required to complete the *Protecting Children – Mandatory Reporting and Other Legal Obligations* online module annually.

All School Council and sub-committee members are considered to be in governance roles with an ability to influence MGGS's decision-making and therefore are required to be treated as responsible persons and undertake regular child safe training, including the online module from the Department of Education and Training - *Protecting Children – Mandatory Reporting of Child Abuse*. To ensure our School Council and sub-committee members are equipped with the knowledge required to make decisions in the best interests of student safety and wellbeing, and to identify and mitigate child safety and wellbeing risks in our school environment, they will be trained at least annually. Training includes guidance on:

- individual and collective obligations and responsibilities for implementing the Child Safe Standards and managing the risk of child abuse
- child safety and wellbeing risks in our school environment
- MGGS child safety and wellbeing policies, procedures and practices

## **2.11. Recruitment**

At MGGS we apply robust child safe recruitment, induction, training, and supervision practices to ensure that all staff, contractors, and volunteers are suitable to work with children. Our organisation understands that when recruiting staff and volunteers we have ethical as well as legislative obligations.

All public advertisements and selection criteria for job applications with MGGS will emphasise our commitment to child safety.

All people aged 18 and over engaged in child-related work, including volunteers, are required to hold a Working with Children Check and to provide evidence of this Check. Please refer to the *Working with Children Check Policy* on eVI for further information. When engaging staff to perform child-related work, we:

- sight, verify and record the person's Working with Children clearance or equivalent background check such as a Victorian teaching registration
- collect and record:

- proof of the person's identity and any professional or other qualifications
- the person's history of working with children
- references that address suitability for the job and working with children.

We carry out thorough reference checks and pre-employment screening to ensure that we are recruiting with child safety in mind.

All newly appointed staff will be expected to participate in our child safety and wellbeing induction program. The program will include a focus on:

- the *Child Safety Policy* (this document)
- the *Child Safety Code of Conduct*
- the *Child Safety Response and Mandatory Reporting Procedure* and
- any other child safety and wellbeing information that school leadership considers appropriate to the nature of the role.

All staff engaged in child-connected work will be supervised appropriately to ensure that their behaviour towards children is safe and appropriate. Staff will be monitored and assessed to ensure their continuing suitability for child-connected work. This will be undertaken by line managers with their staff on an ongoing basis, after promotion to a new role and at the 3 and 6 month mark after commencement at MGGS. MGGS promotes a culture of open discussion regarding child safety and suitable behaviours and the Executive Team are regularly prompted to raise any staffing concerns they may have.

Inappropriate behaviour towards children and young people will be managed swiftly and in accordance with our school and department policies and our legal obligations. Child safety and wellbeing will be paramount.

All volunteers are required to comply with our *Volunteers Management Procedure*, which describes how we assess the suitability of prospective volunteers and outlines expectations in relation to child safety and wellbeing induction and training, and supervision and management.

## **2.12. Supporting Our School Community**

Key principles that we must apply in the design of policy, procedure, interventions, support and reporting in our child protection program are to ensure we:

- promote the cultural safety of Aboriginal and Torres Strait Islander children and young people
- promote the cultural safety of children from culturally and linguistically diverse backgrounds
- promote the safety of children with any form of disability.

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

We have developed the following strategies to promote cultural safety in our school community:

- *MGGS Diversity and Inclusion Policy*.
- *MGGS Reconciliation Action Plan* (currently under review).
- Acknowledgement of Country at staff meetings and assemblies.
- Cultural inclusion in the MGGS events calendar.
- Cultural Competency training.
- Cultural leave able to be approved at the discretion of the Principal or delegate.
- Indigenous representation on the MGGS Institute Advisory Board.

MGGS is committed to communicating our child safety strategies to the School community through:

- ensuring that key child safety and wellbeing policies are available on our website including the *Child Safety Policy* (this document), *Child Safety Code of Conduct*, and the *Child Safety Response and Mandatory Reporting Procedure*
- updates in our school newsletter
- ensuring that child safety is a standing agenda item at School leadership meetings and School Council meetings.

### 2.13. Support for Affected Students

Ensuring a student feels safe and supported following an incident is of critical importance to MGGS. MGGS will also ensure that appropriate assistance and support is provided to any child who discloses child abuse or is linked in any way to suspected child abuse. MGGS will work closely with the students, parents and carers and our wellbeing team to provide all additional support services that are available. Each matter will be handled on a case-by-case basis. An individual may be supported with:

- Referral to the School counselling team.
- Referral to external specialist agencies.
- Family counselling.
- Academic support.

### 2.14. Fair Procedures

The safety and wellbeing of children is our primary concern. We are also fair and just to personnel. The decisions we make when recruiting, assessing incidents, and undertaking disciplinary action will always be thorough, transparent, and based on evidence. We record all allegations of abuse and safety concerns using our incident reporting form, including investigation updates.

### 2.15. Privacy and Confidentiality

All personal information considered or recorded will respect the privacy of the individuals involved, whether they be staff, volunteers, parents or children, unless there is a risk to someone's safety. All records are securely stored by the School Counselling team, with a secure copy held in the Principal's Office. We have safeguards and practices in place to ensure any personal information is protected in accordance with our *Privacy Policy* and applicable legislation. Everyone is entitled to know how this information is recorded, what will be done with it, and who will have access to it. A copy of the *Privacy Policy* is available on the School website and on eVI.

New staff and nominated volunteers will be provided at induction with information to ensure they understand the School's commitment to child safety and that everyone has a role to play in protecting children from abuse.

Where there is suspected abuse or misconduct, employees, volunteers and contractors must not disclose or make use of the information in a manner that breaches confidentiality, other than to report and act consistent with the Child Safety Policy and relevant statutory requirements.

### 2.16. Legislative Responsibilities

At MGGS we take our legal responsibilities seriously, including:

- **Failure to disclose:** Reporting child sexual abuse is a community-wide responsibility. All adults in Victoria who have a reasonable belief that an adult has committed a sexual offence against a child under 16 have an obligation to report that information to the police. If you fail to report the information, you may be charged with a criminal offence. The maximum penalty is three years imprisonment.
- **Failure to protect:** People of authority in our organisation will commit an offence if they know of a substantial risk of child sexual abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so. If you fail to protect a child you may be charged with a criminal offence. The maximum penalty is five years imprisonment.

Please refer to the *Child Safety Response and Mandatory Reporting Procedure* for further information on these responsibilities.

## 2.17. Child Protection allegations, concerns and complaints

MGGS fosters a culture that encourages staff, volunteers, students, parents, and the school community to raise concerns and complaints. This makes it more difficult for breaches of the code of conduct, misconduct or abuse to occur and remain hidden.

We have clear pathways for raising complaints and concerns and responding and this is documented in our [Complaints and Resolution Guidelines for Parents](#) and [Students and Staff Complaints Resolution Policy](#).

If there is an incident, disclosure, allegation or suspicion of child abuse, all staff and volunteers (including School Council members, employees and homestay providers) must follow our [Child Safety Response and Mandatory Reporting Procedure](#). Our policy and procedures address complaints and concerns of child abuse made by or in relation to a child or student, school staff, volunteers, contractors, service providers, visitors or any other person while connected to the School.

As soon as any immediate health and safety concerns are addressed, and relevant School staff have been informed, we will ensure MGGS follows:

- the [Four Critical Actions](#) for complaints and concerns relating to adult behaviour towards a child
- the [Four Critical Actions: Student Sexual Offending](#) for complaints and concerns relating to student sexual offending

Our *Student Wellbeing Policy* and *Bullying Prevention and Intervention Policy* cover complaints and concerns relating to student physical violence or other harmful behaviours.

Our Child Safety Program provides detailed guidance for members of the School Council, staff and volunteers as to how to identify key risk indicators of child abuse and how to report child abuse concerns to a member of our Child Safety Team. It also provides detailed procedures with respect to the reporting of child abuse incidents to relevant authorities.

Staff, students, parents and carers, external education providers, contractors, volunteers or other community members who have concerns that a child may be subject to abuse are asked to contact a member of the Child Safety Team.

In addition to the Principal, the members of the MGGS Child Safety Team are the persons holding the following positions:

- Deputy Principal
- Executive Director Junior Years and Early Learning
- Executive Director Middle Years
- Executive Director Senior Years

The Principal's contact details are:

Dr Toni Meath  
Principal  
Melbourne Girls Grammar  
86 Anderson Street  
South Yarra

Telephone: 9862 9200 Email: [principal@mggs.vic.edu.au](mailto:principal@mggs.vic.edu.au)

In the absence of the Principal, the Deputy Principal becomes responsible for managing MGGS's response.

MGGS takes all allegations seriously and has practices in place to investigate thoroughly and with urgency. If an allegation of abuse or a safety concern is raised, we provide updates to children and families on progress and any actions we as an organisation take. Our staff are trained to deal appropriately with allegations and our volunteers are informed on how to report an allegation. We work to ensure all children, families, staff and volunteers know what to do and who to tell if they observe abuse or are a victim, and if they notice inappropriate behaviour.

We all have a responsibility to report an allegation of abuse if we have a reasonable belief that an incident took place (see information about failure to disclose above). All communications will be treated on a need-to-know basis.

Whenever there are concerns that a child is in immediate danger please call 000 without delay.

For the School's procedures for responding to and reporting historical or past claims, refer to the *Child Abuse Redress Policy*.

## 2.18. Risk Management

In Victoria, organisations are required to protect children when a risk is identified. In addition to general occupational health and safety risks, we proactively manage risks of abuse to our children. We have risk management strategies in place to identify, assess, and take steps to minimise child abuse risks, which include risks posed by physical environments (for example, any doors that can lock), and online environments (for example, no staff or volunteer is to have contact with a child in organisations on social media). The MGS Executive Team meets on a regular basis and has a standing agenda item for Child Safety.

## 3. POLICY COMPLIANCE

### 3.1. Policy Breach

A breach of this policy or procedure may lead to disciplinary action. All breaches, near misses and risks related to this policy should be reported to the Policy Owner and the Risk and Compliance Manager.

### 3.2. Policy Compliance monitoring

Compliance with this policy will be monitored by the Policy Owner and Risk and Compliance Manager and this may include independent audits and reviews.

## 4. DEFINITIONS

Child	An individual who is under the age of 18 years and who is enrolled as a student at MGS.
Child abuse	Child abuse includes- (a) any act committed against a child involving- (i) a sexual offence; or (ii) the offence of grooming; and (b) the infliction, on a child, of- (i) physical violence; or (ii) serious emotional or psychological harm; and (c) serious neglect of a child.
Child-connected work	This is work that is authorised by MGS that is performed by an adult in the MGS school environment while children are present or reasonably expected to be present.
Child safety	Child safety encompasses matters related to protecting all children from child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to incidents or allegations of child abuse.
Child Safety Team	The MGS Child Safety Team comprises: <ul style="list-style-type: none"> <li>• Principal</li> <li>• Deputy Principal</li> <li>• Executive Director of Early Learning and Junior Years</li> <li>• Executive Director of Middle Years</li> <li>• Executive Director of Senior Years</li> </ul>

Failure to protect a child from a sexual offence	<p>The offence provides that a person who:</p> <p>a. by reason of the position he or she occupies within a relevant organisation, has the power or responsibility to reduce or remove a substantial risk that a relevant child will become the victim of a sexual offence committed by a person of or over the age of 18 years who is associated with the relevant organisation; and</p> <p>b. knows that there is a substantial risk that the person will commit a sexual offence against a relevant child – must not negligently fail to reduce or remove that risk.</p>
Failure to disclose an offence	<p>A person of or over the age of 18 years (whether in Victoria or elsewhere) who has information that leads the person to form a reasonable belief that a sexual offence has been committed in Victoria against a child under the age of 16 years by another person of or over the age of 18 years must disclose that information to a police officer as soon as it is practicable to do so, unless the person has a reasonable excuse for not doing so.</p>
Grooming	<p>The <b>offence of grooming for sexual conduct with a child under the age of 16</b> is found in section 49M of the <i>Crimes Act 1958</i>. That section provides: (1) A person (A) commits an offence if— (a) A is 18 years of age or more; and</p> <p>(b) A communicates, by words or conduct (whether or not a response is made to the communication), with— (i) another person (B) who is a child under the age of 16 years; or (ii) another person (C) under whose care, supervision or authority B is; and</p> <p>(c) A intends that the communication facilitate B engaging or being involved in the commission of a sexual offence by A or by another person who is 18 years of age or more.</p> <p>(2) A person who commits an offence against subsection (1) is liable to level 5 imprisonment (10 years maximum).</p> <p>(3) A does not intend to facilitate B engaging or being involved in the commission of a sexual offence by A or by another person who is 18 years of age or more if, were the conduct constituting the sexual offence to occur, A or the other person would satisfy an exception, or have a defence, to that sexual offence.</p> <p>(4) It is immaterial that some or all of the conduct constituting an offence against subsection (1) occurred outside Victoria, so long as B or C was, or B and C were, in Victoria at the time at which that conduct occurred.</p> <p>(5) It is immaterial that B or C was, or B and C were, outside Victoria at the time at which some or all of the conduct constituting an offence against subsection (1) occurred, so long as A was in Victoria at the time that conduct occurred.</p> <p>(6) It is immaterial that A, B and C were all outside Victoria at the time at which some or all of the conduct constituting an offence against subsection (1) occurred, so long as A intended that the sexual offence would occur in Victoria.</p> <p>(7) In this section—  <b>communication</b> includes an electronic communication within the meaning of the <i>Electronic Transactions (Victoria) Act 2000</i>;  <b>sexual offence</b> means—  (a) an offence against a provision of Subdivision (8A), this Subdivision (other than section 49K(1) or this section), (8C), (8D), (8E), (8F) or (8FA); or  (b) an attempt to commit an offence covered by paragraph (a); or  (c) an assault with intent to commit an offence referred to in paragraph (a).</p> <p>Further information can be obtained at:  <a href="http://www.justice.vic.gov.au/safer-communities/protecting-children-and-families/grooming-offence">www.justice.vic.gov.au/safer-communities/protecting-children-and-families/grooming-offence</a></p>

School environment	The MGGS school environment is any physical or virtual place made available or authorised by MGGS for use by a child during or outside school hours, and includes: <ul style="list-style-type: none"> <li>• our Morris Hall Campus in Caroline Street, South Yarra</li> <li>• our Merton Hall Campus and ELC and Boarding House facilities in Anderson Street, South Yarra</li> <li>• online school environments including email and intranet systems</li> <li>• other locations provided by MGGS for a child's use, including locations used for school camps, sporting events, excursions, competitions and other events.</li> </ul>
Student	A person who is enrolled at or attends the school or a student at the school boarding premises.
Volunteer	A person who performs work without remuneration or reward for the school or school boarding premises in the school environment

## 5. RELATED POLICIES, PROCEDURES AND LEGISLATION

### 5.1. MGGS policy and procedure alignment

- *Anaphylaxis Management Policy*
- *Child Safety Code of Conduct*
- *Child Abuse Redress Policy*
- *Child Safety Response and Mandatory Reporting Procedure*
- *Child Safety Strategy*
- *Communication Technologies Policy*
- *Counselling Guidelines*
- *Merton Hall Excursions and Camps Policy*
- *Morris Hall Excursions and Camps Policy*
- *Working with Children Check Policy*
- *Privacy Policy*
- *Trips and Tours Policy*
- Victorian Institute of Teaching Code of Conduct
- *MGGS Recruitment Guidelines*
- HR Employment Section on MGGS website
- *COVID-19 Vaccination (Workers) Policy and COVID Safe Plan*

### 5.2. Related legislation

The following legislation, standards and regulations apply and this policy aligns with these mandated requirements:

- *Ministerial Order 706*
- *Ministerial Order 1359*
- *Education and Training Reform Act 2006* (Vic)
- *Child Wellbeing and Safety Act 2005* (Vic)

Further information on this policy can be obtained from: the Deputy Principal.

## 6. POLICY REVIEW AND APPROVAL

At MGGS, we have established processes for the review and ongoing improvement of our child safe policies, procedures, and practices. This policy is rated high risk.

We will:

- review our policy on an annual basis or following any significant child safety incident that occurs and improve our policy and procedures as required
- analyse any complaints, concerns, and safety incidents to improve policy and practice and keep up-to-date with changes to laws and government policies
- act with transparency and share pertinent learnings and review outcomes with school staff and our school community.

This Policy is to be reviewed by the Deputy Principal and Risk and Compliance Manager.

Any significant proposed changes to this Policy must be approved by the Principal and School Council.