



Child Protection Policy

Foundation for Life

Child Protection Policy

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Child Protection Policy

1. Policy Statement

This policy sets out the approach that Coast (“Coast”) takes to care for, support and protect children in our care from harm. The safety, welfare and wellbeing of children is the paramount consideration¹ for all responsibilities under this Policy, and we have a zero tolerance for child abuse and neglect.

We acknowledge that children, like adults, possess human rights and that children have the right to special protection because of their vulnerability to exploitation and abuse². In the context of Coast, children have the right to learn in a safe, caring, accepting and protected environment.

Coast is committed to following all measures legislated to protect children and young people, including the February 2019 [National Principles for Child Safe Organisations](#). Additionally, our Biblical Christian worldview compels us to protect and support children - and any other vulnerable person - from harm.

Although the Keep Them Safe initiative³ has ended, Coast adopts one of the key precepts of the program; namely that “caring and supporting children is first and foremost the responsibility of parents, families and communities, and when Government support becomes necessary, child protection is not the sole responsibility of Community Services but a collective responsibility”.

Coast aims to create a safe setting where students are supported, respected and empowered to learn in a Christian setting.

Coast acknowledges its duty of care to keep children safe and protection them from ill-treatment (including sexual abuse, abuse by neglect, emotional abuse, physical abuse etc), and aims to take a proactive approach to ensuring student wellbeing.

2. Policy Approval

¹ Section 7 – Children’s Guardian Act (NSW) 2019

² United Nations Convention on the Rights of the Child (CRC) 1990

³ NSW Government’s “Keep Them Safe” initiative (2009-2014)

This Policy has been set in place and approved by the Board of Directors to ensure Child Protection a critical part of the functioning of Coast.

3. Responsibility for Child Protection

The responsibility to keep children safe applies to everyone involved at Coast, including the following:

- Staff including those employed on a permanent, temporary, casual or other basis
- Board Members
- Volunteers
- Parents/Guardians/Relatives of students
- Contractors
- Consultants
- Prac Teachers
- External providers (eg speech therapists, music tuition providers etc)
- Visitors including adults involved in Coast Community Church which shares somewhat the site premises with Coast
- Children – who will be guided and supported to protect other children
- Any other person who comes into contact with children at Coast

and for the purposes of this Policy the above are referred to as “School Community Members”.

Coast requires School Community Members to be aware of their obligations under this Policy, and at law, and to actively manage child protection risk to ensure a zero-tolerance approach is taken.

4. Guiding Principles

- All School Community Members have a responsibility to protect children from harm.
- Coast acknowledges that parents entrust us with the care of their children.
- Coast works in partnership with families, but will always put the safety and well-being of children and young people first.
- Coast is responsible for providing a safe environment for children in our care.
- Coast is responsible to provide an education which fosters children’s health, developmental needs, spirituality, well-being, self-respect and dignity.
- Coast recognises that a proactive approach to preventing child abuse, and early intervention, is vital in ensuring children are protected from harm.

- School Community Members should be equipped to ensure the safety of children, and to prevent anything that puts the safety and wellbeing of students in question.
- School Community Members should understand their own individual obligations and be equipped to respond to child abuse appropriately.
- School Community Members should understand what constitutes reportable conduct and how to report appropriately.
- Any issue that puts a child at risk should be rectified and reported immediately.
- Reports of a child at risk should be responded to immediately.
- Any Coast Staff who are also Mandatory Reporters (see definition below) should be aware of the additional obligations of the role of Mandatory Reporter.
- Relevant School Community Members are to hold a clear Working With Children Check.

5. National Principles for Child Safe Organisations

The above principles are based on Coast's commitment to complying with the 10 Principles set out in the National Principles for Child Safe Organisations (2019), which are as follows:

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Online environments are accessed only in line with Coast policy to ensure children are aware of potential dangers and remain safe.
9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

6. Duty of Care Required

All School Community Members have a duty to take reasonable care for the safety and welfare of Students when in their care. The duty extends to considering known hazards or risk of harm that can be reasonably predicted and taking all reasonable action to protect Students. The standard of care that is required takes into consideration various factors such as a Student's maturity and ability.

The duty of care includes an obligation not to neglect the welfare of students. Neglect includes either an action or inaction by a person who has care responsibilities towards a Student, and includes:

1. Supervisory neglect (failure to adequately supervise a Student),
2. Carer neglect (inadequate care of a Student),
3. Failure to protect (unreasonable failure to protect or respond to information that may result in harm to a Student), and/or
4. Reckless acts or failure to act (including a gross breach of professional standards that may result in harm to a Student).

A single or repeated failure to exercise an appropriate duty of care of students may constitute neglect or negligence according to the law if actual harm is caused or even if there is potential to cause harm.

7. Coast's Participation in Redress Scheme

As further evidence of Coast's commitment to protecting children and ensuring any harm is addressed appropriately, Coast has opted in to the National Redress Scheme in response to the ["Royal Commission into Institutional Responses to Child Sexual Abuse"](#).

8. Child Protection Code of Conduct

Coast has developed the Child Protection Code of Conduct to support School Community Members in understanding their obligations to protect Children.

9. Other Codes of Conduct

Coast has developed the following general Codes of Conduct which assist various School Community Member groups with awareness of how they should behave at Coast, including their conduct and contact with children:

- Staff Code of Conduct
- Parents & Visitors Code of Conduct
- Student Code of Conduct (which is drawn in a Child-Friendly manner so as to engage children and maximise their understanding of the behaviour expected of them)

10. Responsibility for Monitoring this Policy

Coast's Board of Directors has ultimate responsibility for the detection and prevention of child abuse and is responsible for ensuring that appropriate and effective internal control systems are in place. The Board is also responsible for ensuring that appropriate policies and procedures and a Child Protection Code of Conduct are in place.

11. Responsibility for Implementing this Policy

It is the Principal's responsibility to:

- promote child safety at all times
- ensure procedures are in place to require all School Community Members to be aware of, and to abide by, this Policy (including awareness of how to prevent and detect child abuse)
- ensure reports of child abuse (including sexual abuse) are dealt with appropriately
- conduct regular risk assessments to ensure Coast activities are safe
- ensure appropriate reporting of any actual or suspected child abuse issues

12. Reporting Observations of Child Abuse

There are three different schemes of Reporting referenced under this Policy, summarised as follows and detailed in separate headings below:

1. Reporting to the OCG – any allegations of “Reportable Conduct” observed by “employees”

(as defined below)

2. Reporting to the Principal - any general child protection issues observed by any School Community Member
3. Reporting to the Child Protection Hotline (DCJ) – any Mandatory Reporting issues observed by a Mandatory Reporter (as defined below)

13. Comparison of OCG Reporting and Mandatory Reporting

OCG Reporting focuses on allegations of harm (defined below) against children BUT only when the alleged perpetrators are “employees” (defined below) of Coast. All School Community Members are to report reportable conduct to the Principal who conducts an investigation and informs the OCG at various steps along the way so that the OCG can ensure the investigation is running appropriately.

The Mandatory Reporting scheme focuses on risk of harm (defined differently below) to children when the alleged perpetrators are from anywhere at all and any relationship to the child (eg relatives/neighbours; not just Coast staff etc). Only those in Professional roles with children are Mandatory Reporters (see definition below) and they have a professional obligation to personally report to the Child Protection Hotline (ie with or without the Principal’s knowledge or consent). The “mandatory” component comes into play when the risk of harm is Significant, but the option to report less-than-significant risk of harm remains available – this can include where a seemingly minor one-off incident is becoming a pattern which may (or may not) eventuate to be Significant. Although any person is at liberty to report their concerns to the Child Protection Hotline, Coast recommends that the Principal take the responsibility for reporting any issues concerning children at Coast which do not otherwise fall within the “Significant” risk of harm provisions of the Mandatory Reporting Scheme.

Neither Scheme requires the abuse/neglect to have occurred at School. Both Schemes extend to abuse/neglect which has happened either at School or elsewhere, and whether recently or in the past. Both Schemes require Coast to respond appropriately to the allegations of abuse/neglect. Aside from any concurrent reporting obligations, all School Community Members must be aware of how to protect children from harm and how to respond if a child is being harmed.

14. NSW Reportable Conduct Scheme - OCG

14.1. About the Scheme

The Reportable Conduct Scheme is a NSW Government initiative which has been in operation since 1999. In response to the Royal Commission into Institutional Responses to Child Sexual Abuse, the Scheme transferred in March 2020 from the responsibility of the NSW Ombudsman to the [Office of the Children's Guardian](#)⁴.

14.2. What the OCG oversees

The OCG now oversees:

- The NSW Reportable Conduct Scheme
- Working with Children Checks
- The Child Safe Standards - which substantially mirror the [National Principles for Child Safe Organisations](#) – see above).

14.3. Intention of Scheme

The Scheme allows the OCG to:

- actively ensure Coast has proper policies and procedures in place to keep children safe, and
- monitor and guide the progress of any investigation at Coast

14.4. Conduct Covered by the NSW Reportable Conduct Scheme

Conduct covered by the Scheme ("[Reportable Conduct](#)") is:

- a sexual offence
- sexual misconduct
- ill-treatment of a child
- neglect of a child
- assault against a child
- failure to protect OR failure to report offences
- behaviour causing significant emotional or psychological harm to a child

14.5. OCG FAQs for Employees

Coast requires all "Employees" (defined below) to read and keep in mind [FAQs for Employees](#). This brochure defines who is an "employee" for the purpose of the OCG Reportable Conduct scheme.

⁴ Children's Guardian Act (NSW) 2019

14.6. OCG FAQs for Employers

Coast adopts, and requires all “Employees” (defined below) to read and keep in mind, [FAQs for Employers](#) so they can understand Coast’s overarching obligations.

14.7. Obligations under Scheme

The following obligations apply under the Scheme⁵:

1. School Community Members are to report Reportable Conduct (including allegations) immediately of becoming aware to the Principal, or if the allegation is about the Principal, then directly to the OCG via reportableconduct@kidsguardian.nsw.gov.au OR use [OCG Forms](#).
2. Principal to report to the OCG⁶ ([using OCG Forms](#)) within 7 business days of being made aware of any allegation [*noting there does not need to be any evidence or proof that the conduct occurred*] made against any of the following persons that provide services to children:
 - Staff [*even if the alleged conduct occurred outside of, or before commencement of, their course of employment*]
 - Volunteers [*even if the alleged conduct occurred outside of, or before commencement of, their volunteer work, regardless of whether a Working With Children Check is required – so this category includes Parent Volunteers*]
 - Contractors/subcontractors - if required to hold a Working with Children Check for the purpose of their engagement with Coast [*even if the alleged conduct occurred outside of, or before commencement of, their engagement with Coast*]

and which may constitute reportable conduct [*whether or not the alleged conduct took place before the above were engaged with Coast, meaning even a historic allegation is reportable*]

For clarity:

- Allegations of reportable conduct trigger the obligation to report – even if there is evidence or proof that indicates the offence did not occur.

⁵ Coast is a Schedule 1 entity which dictates who the relevant “employees” are for the purpose of the Act

⁶ Office of Children’s Guardian – 02 8219 3800 or reportableconduct@kidsguardian.nsw.gov.au (Mon-Fri 9am-4pm)

- As long as the alleged offender is currently employed/engaged by Coast at the time Coast learns of the allegation, it must be reported to the OCG.
 - If Coast learns later of an allegation which took place during the course of employment/engagement, but which Coast did not know about until cessation of the employment/engagement, this need not be reported to the OCG.
 - The above only deals with reports to the OCG. Any concurrent obligations to report to the policy OR as a mandatory reporter to DCJ, still apply.
3. Principal to conduct an investigation
 4. Principal to submit a final investigation report to the OCG within 30 days (using [OCG Forms](#))

14.8. Further information about the Scheme

Further information about the Scheme and Coast's responsibilities are linked below:

- [Identifying Reportable Allegations](#)
- [Principal's Responsibilities](#)
- [Risk management following an allegation](#)
- [Planning and conducting an investigation](#)
- [Recognising and managing conflicts of interest](#)
- [Disclosing information to children, parents and carers](#)
- [Making a Finding of reportable conduct](#)

15. Mandatory Reporting to the DCJ Child Protection Hotline

15.1. About Mandatory Reporting

Mandatory Reporting is a NSW Government scheme which requires a limited number of Professionals to report suspected child abuse and neglect to the Child Protection Hotline operated by the Department of Communities and Justice ("DCJ") formerly "FACS" and previously "DOCS"). The Scheme is underpinned by the [Children and Young Persons \(Care and Protection\) Act 1998](#) (the Care Act) and associated legislative framework.

15.2. Conduct Covered by the Mandatory Reporting Scheme

Conduct covered by the Mandatory Reporting Scheme includes, but is not limited to, concerns that a child or young person is at risk of:

- being neglected
- being physically, sexually or emotionally abused

(See further below about whether the risk of harm needs to be Significant).

15.3. Who is a Mandatory Reporter at Coast?

Based on the provisions of the Care Act, the relevant roles at Coast who are Mandatory Reporters are:

- Principal;
- Proficient Teachers, and any Highly Accomplished or Lead Teachers as may be employed from time to time;
- School Counsellors (if any); and
- Allied Health professionals eg Speech Therapists, Occupational Therapists etc (insofar as they deliver onsite services to Coast pupils);

NOTE: Provisional/Conditional/Prac Teachers should make enquiries with their TAA to determine whether they are a Mandatory Reporter.

The list of Mandatory Reporters was expanded in March 2020 (following the recommendations of the Royal Commission into Institutionalised Abuse) to include:

- People in religious ministry who, at Coast, include:
 - The School Chaplain if also in religious ministry;
 - Any Board Member who is also a CCC Pastor insofar as their duties relate to religious activities provided to Coast pupils;
 - CCC Children's Ministry Leader insofar as their duties relate to Chapel etc and providing services for Coast pupils.

AND

- Registered Psychologists (if and when such a provider might attend Coast to provide professional services to pupils)

It is part of the professional qualifications of Mandatory Reporters to be familiar with their own obligations, but Coast sets them out in this Policy for the benefit of others and to act as a “refresher”.

If a Mandatory Reporter has concerns about a child who they do not have a professional relationship with (eg a 3-year old child of a colleague), they should report to the Child Protection Hotline as an Individual and not as a Mandatory Reporter.

15.4. Who is NOT a Mandatory Reporter at Coast?

- Office staff
- Aides
- Canteen Manager
- Bus Driver
- Maintenance officer
- Cleaner
- And all other roles who do not fit within the definition of Mandatory Reporter provider above
- Other School Community Members

However, just because a person involved with Coast is not a Mandatory Reporter, does not mean their responsibility under this Policy is reduced.

There remains an obligation owed by all School Community Members to report any child protection issues they observe to the Principal, as covered in this Policy.

15.5. What is a Mandatory Reporter at Coast required to do?

A Mandatory Reporter is mandated under the Children and Young Persons (Care and Protection) Act 1998 (“the Care Act”) to:

- report to the [Child Protection Helpline \(DCJ\)](#)
- if they suspect a child, or a class of children, is at risk of Significant harm from abuse or neglect
- when their awareness arises because of their professional relationship with a child

It is a criminal offence for a Mandatory Reporter not to report a risk of harm when it is [Significant](#).

It is a “must” (but not to the extent of a criminal offence for omission) for a Mandatory Reporter to report a risk of harm that is [not Significant](#).

Mandatory Reporters at Coast, may also report concerns held about the safety, welfare, or well-being of a young person (16-17 years of age), but are not required to do so by law.

15.6. How does a Mandatory Reporter ensure their observation is reportable?

Use the Mandatory Reporter Guide (MRG) on the Child Story website (<https://reporter.childstory.nsw.gov.au/s/>). This is commonly known as using “the Decision Tree”.

The Child Protection Helpline **must** be contacted when:

- There are current concerns about suspected risk of significant harm and/or
- The Mandatory Reporter Guide indicates this should be done.

15.7. How to Make a Mandatory Report

There are two ways Mandatory Reporters can make a Child Protection Report:

1. By making an eReport through the ChildStory Reporter website
2. By calling the Child Protection Helpline on 132 111; open 24 hours per day, 7 days per week

15.8. Reports from Non-Mandatory-Reporters

The general public (including School Community Members) who are not Mandatory Reporters are at liberty (but not mandated) to make Reports to the Child Protection Helpline.

15.9. What might happen as a result of a Mandatory Report

In the event DCJ receives a Risk of Significant Harm report, it may take the following action, which Coast will fully co-operate with:

STUDENT INTERVIEWS IN CASES REPORTED TO DCJ

In relation to reportable cases of risk of significant harm where DCJ has been notified, officers of Joint Investigation and Response Team (JIRT) may wish to carry out student interviews, sometimes at School.

No student will be interviewed at the School against the wishes of the student and it is the Principal's responsibility to inform the student of this.

At the commencement of the interview, the Principal should ask the investigating officers to explain to the student, in the presence of the Principal, the purpose of the interview and their role. The Principal will inform the student of the right to choose a supportive adult to be present at the interview. JIRT Officers are responsible for communicating with parents about any matters related to an interview. If a person is nominated by the student, the interview must not commence until that person has arrived. What takes place in the interview becomes part of the investigation and must remain confidential.

Except in cases which involve a member of the family, it is expected that a parent of the child concerned will be present at any interview with the child.

REMOVAL OF STUDENTS BY DCJ/JIRT OFFICERS

If the Principal is approached by officers from DCJ or JIRT to remove a student from the School premises, the Principal must:

- Sight the identification of the officers
- Take a copy of the Notice to Remove Student from School
- Record details of the actions, names of officers and, where possible, new location of student
- Gain an assurance from officers that they will immediately inform the parent/carer that the student has been removed from the School

EXCHANGE OF INFORMATION

Because the protection of children and young people from risk of harm is deemed to be more important in some situations than an individual's right to privacy, there are statutory provisions that override restrictions on disclosure of personal information.

Chapter 16A of the *Children and Young Persons (Care and Protection) Act 1998* allows government agencies and non-government organisations who are prescribed bodies to exchange information that relates to a child's or young person's safety, welfare or well-being, whether or not the child or young person is known to Community Services, and whether or not the child or young person consents to the information exchange. Chapter 16A also requires prescribed bodies to take reasonable steps to coordinate decision making and the delivery of services regarding children and young people.

Coast is a prescribed body and as such will respond to requests under Section 16A where appropriate. Community Services can also make requests under Section 248 of the Act, and again, Coast will comply where appropriate and as required.

All Section 16A or Section 248 requests for information should be directed to the Principal who will consult as required and determine the validity of a request and co-ordinate Coast's response. Similarly, should Coast wish to use the provisions of Section 16A to seek information

from another agency, this should be co-ordinated via the Principal.

Before any phone discussions take place between DCJ officers and the Principal, the Principal will confirm the identity of the caller by phoning the known number of DCJ.

Any staff receiving a call from DCJ or JIRT must refer the matter to the Principal.

Providing information in good faith to external investigators - including a response to requests for information, is not regarded by Coast as a breach of professional ethics or standards of professional conduct and does not carry liability against Coast for defamation or grounds for civil action.

16. Reporting to the Principal

In addition to reporting as required under the OCG NSW Reportable Conduct Scheme and as required under the Mandatory Reporting Scheme to DCJ, School Community Members are required to report all child protection concerns to the Principal, unless one of the following exceptions apply:

- The Principal is the alleged offender (in which case the issue should be reported to the Board Chair)
- The circumstances are such that a reasonable person would regard it as inappropriate to inform the Principal
- Any other reason at law

17. Child Protection Investigations - Generally

All School Community Members commit to co-operating fully with any investigation concerning child abuse or neglect.

The Principal, or delegate, is responsible to conduct an internal investigation of any allegation of child abuse. Investigations may simultaneously be conducted by external authorities. Coast's conduct of investigations is underpinned by principles of natural justice and procedural fairness.

The Principal has discretion to stand down a Coast staff member (with pay where appropriate) or volunteer while an investigation is being conducted (see Staff Discipline Policy).

18. Consequences of Breach of Child Protection Policy

The consequences of breaching Coast's Child Protection Policy vary according to the circumstances, but may include:

- a written warning/caution
- summary dismissal
- report to external authorities, including OCG, DCJ, police etc
- other actions under the Staff Discipline Policy as may be relevant

19. Child-Focused Risk Management

School Community Members will endeavour to use child-focused risk management practices in their activities, in accordance with the Coast's Risk Management Policy.

Risk assessments are to be conducted for Coast activities, before the activity is undertaken, to ensure programs are safe and appropriate for children, and that any known risks are managed proactively.

20. How to Identify Abuse or Neglect

Although this [Fact Sheet](#) relates to the OCG Scheme, it is helpful in identifying abuse or neglect.

Although this [Fact Sheet](#) relates to the Mandatory Reporting Scheme, it is helpful for recognising signs of abuse or neglect.

21. How to Respond to Abuse or Neglect

Where there are urgent concerns for a child's safety or wellbeing, the emergency service 000 should be contacted. In this instance, Coast undertakes to cover the expense of the ambulance service, if required, as a gesture of good faith and not as any admission of liability.

Although this [Fact Sheet](#) relates to the Mandatory Reporting Scheme, it is helpful for informing School Community Members about how to respond if a child discloses abuse.

Although this [Fact Sheet](#) relates to the Mandatory Reporting Scheme, it is helpful for informing School Community Members about how to respond if a parent discloses abuse.

22. Documenting Observations and Response

Any School Community Member who observes or receives a disclosure of child abuse must document their observations and response – in a confidential manner, and provide a copy to the Principal immediately.

23. Ongoing Training

All School Community Members must participate in reasonable training opportunities as recommended and provided by Coast as appropriate to the context in which the Community Member participates in Coast activities. This ensures Community Members maintain an understanding of child protection laws and the School's policies and procedures in relation to the care of students.

Child Protection training is provided to Coast staff annually, which includes:

- Ensuring Staff have the Coast Child Protection Policy and Code of Conduct front of mind daily
- Reminding Staff of methodology for identifying and responding to a Risk of Significant Harm
- Reminding Staff of their personal obligations, including appropriate responses to any allegation or complaint of improper conduct by another staff member
- Reminding Staff of their reporting obligations and processes
- Ensuring Staff are cognizant of their own responsibility to have an up-to-date clear Working with Children Checks, including any change of contact details.
- Updating Staff of any changes or updates to Child Protection legislation or methodologies

Staff will sign an Attendance Sheet as evidence of having received annual training, and any mid-year refreshers/updates, to be retained by Coast for at least 7 years.

Staff who are absent from training sessions or who are employed during a school year after the Child Protection training has been conducted will be required to read the policy and sign to acknowledge an understanding of their obligations.

Any staff member who has not participated in NSW Child Protection Training within the 12 months period prior to commencing employment with Coast, will be required to participate in a relevant Child Protection Training Program and provide the Principal with evidence of course completion within one month of commencing their employ at Coast Christian School.

COMMUNICATING THIS POLICY AND PROCEDURES

Education about Child Protection is an ongoing and regular discussion for School Community Members as vital preventative aspects of Child Protection.

The Principal will ensure Policies and Procedures are regularly reviewed and updated and communicated to staff.

School Community Members will be made aware of their Obligations under this Policy by:

1. **Staff** - All staff will be made aware of this Policy via annual compulsory Child Protection training. Training will be delivered either internally or facilitated through an external provider. This training will occur during the January Staff Development week. A log of staff that have participated in child protection training will be kept by the Principal.

Throughout the year relevant information will be forwarded to staff electronically to ensure they are up to date.

Staff will be reminded of the Policy through review at staff development meetings from time to time.

The explanation and implementation of this policy and procedures shall form part of the staff induction program.

2. **Parent/carer/volunteer/visitors** – The Child Protection Policy is available on the School's website.

Information about Child Protection provided regularly, and especially during Child Protection Week, informing parents/carers of Coast's Child Protection teaching program

as well as Coast's Child Protection practices and rationale. Parents and carers are also made aware of their compulsory Reporting obligations via the Newsletter.

Any visitors to the School are required to enter via the School Office, which displays the Child Protection Policy and a Reminder Notice.

3. **Students** – The Child Protection Policy will be integrated in the PDHPE program during Child Protection lessons.

Students will be advised by the relevant teaching staff and at an age appropriate level, of the Coast Child Protection procedures.

24. Pre-Engagement Screening

Coast endeavours to screen staff to ensure they are fit and proper persons to be engaging with children, and to undertake their roles generally. Coast utilises this risk management strategy to identify those who are unsuitable. Coast's screening processes include:

For Teaching Staff:

- Working with Children Checks
- Reference checks (character and professional)
- Certified copies of Qualifications

For Other Staff including Finance Manager:

- Working with Children Checks
- Police Checks (where appropriate)
- Certified copies of Qualifications (where appropriate)

For Parent Helpers/Volunteers:

- Working with Children Checks

24.1. Working with Children Checks

The Working with Children Check (WWCC) is an important part of Coast Christian School's screening processes to prevent people who pose a risk to the safety, welfare and well-being of children from being employed or engaged in child-related work.

WHO NEEDS A WORKING WITH CHILDREN CHECK?

1. All School Community Members who have direct contact with children and those whose roles provide them with access to sensitive information about children.

Prior to employment, and on a statutory 5 year cycle the WWCC online application is to be completed by people who are employed or engaged (or who are seeking to be employed or engaged) in child-related work in any one of the following capacities:

- as a paid employee;
- as a self-employed person or as a contractor or subcontractor;
- as a person undertaking practical training as part of an educational or vocational course (other than as a student undertaking work experience); or
- as a minister, priest, rabbi, mufti or other religious leader or spiritual officer of a religion or other member of a religious organisation.

The Coast Registrar (Office Manager) will verify each person's WWCC Number online www.newcheck.kids.nsw.gov.au

The Coast Registrar will maintain records of each cleared worker's WWCC Number, its expiry date, and the date of the school's verification.

Coast Staff (Full Time, Part Time or Casual; Teaching and Non-Teaching) may not commence employment until they provide a Working With Children Check clearance.

2. At Coast, Parent Helpers, including carers, grandparents and relatives acting as volunteers are required to apply for a WWCC.

All Working With Children Check applicants are required to notify the Office of the Children's Guardian (OCG) of changes in their personal details within three months of any change.

UNCLEARED CHECKS

Coast staff members must provide their WWCC Clearance number as part of their application for child-related work. The Coast Registrar will verify the WWCC Clearance number with the NSW Children's Guardian to ensure that it is still valid and current. If the applicant is cleared, the applicant can be employed or engaged. If the applicant is not cleared, the applicant cannot be employed or engaged.

The Principal is to be advised if the person's WWCC is not verified as "cleared".

WHAT IF A PERSON BECOMES BARRED?

The NSW Office of the Children's Guardian (OCG) will notify Coast in writing if a person's WWCC clearance is cancelled or becomes subject to an "interim bar".

In that event, the Principal will remove the person from child-related work immediately. The Principal will contact the OCG to investigate the matter. This investigation may lead to the staff member being:

- suspended pending the outcome of an appeal; or
- summarily dismissed; or
- transferred to a non child-related role.

The staff member will only be returned to working with children if and when the WWCC is "cleared."

NOTE: *Coast is under no obligation to find an alternative position for a barred worker. Damages or compensation are not payable to a worker who has been removed from child-related work because they are barred from working with children.*

24.2. Police Checks

Coast conducts Police Checks before filling selected roles at Coast, including Principal and Business Manager/Finance Manager. In the event a criminal offence arising which indicates a person may not be suitable to work with children or in their relevant role, the Principal will seek professional advice about the appropriateness of the person's employment with Coast.

24.3. Referee Checks

Coast will conduct Referee checks for every employee prior to engagement.

A minimum of two favourable references are required. Referees will be asked their opinion of the applicant's character and suitability for working with, or in the presence of, children. A suggested question to be asked is:

"To your knowledge is there any aspect of the applicant's behavior, actions or activities that would make them unsuitable for working with children?"

The answer provided by the referees to the above question is to be noted on the applicant's interview report.

The Referee Checks may be verbal or in writing, but in any case shall cover off the above question regarding suitability for working with children.

24.4. Copies of Qualifications

The Coast Registrar maintains a Register of all qualifications of those staff who work directly with children. A copy of relevant qualifications certified by a Justice of the Peace or Solicitor is required to be provided to Coast.

25. Privacy & Confidentiality Obligations

Coast understands the need to protect the privacy of children, the privacy of those who raise concerns, and the privacy of those who are alleged to have contravened this policy. Privacy and confidentiality shall prevail unless a person remains at risk of harm, or as is reasonable in the circumstances or required by law.

School Community Members are regularly reminded of their obligation to keep sensitive matters confidential and to ensure privacy around issues of child protection, and other issues, at Coast.

26. Supporting Complainants

Coast understands that a safe and supportive environment is required in order to maximise the potential for those who speak up about concerns. Coast endeavours to foster discussions around child protection in a transparent and inclusive manner that ensures School Community Members can trust that they will be supported and not vilified for communicating concerns or complaints, and that any concerns raised will be taken seriously.

This policy should be read in conjunction with our Whistleblower Policy where appropriate.

27. Child Protection Records

Records of child abuse or allegations of abuse are retained for at least 7 years in a location which is password-protected and accessible by the least number of persons as is efficacious at the discretion of the Principal.

28. Legal Context

This Policy is underpinned by relevant legislation and industrial instruments. In the event of any conflict between this Policy and the legislation, the provisions of legislation take precedence.

Coast abides by the following Child Protection legislative requirements:

- Children and Young Persons (Care and Protection) Act 1998
- Family Law Act 1975 (Cth)
- Crimes Act 1900 (NSW)
- Child Protection (Offenders Registration) Act 2000 (NSW)
- United Nations Convention on the Rights of the Child (1989)

29. Feedback and Evaluation

Coast invites feedback from the School community or general community about our approach to Child Protection as we are committed to continuously improving our policies and procedures to ensure child safety and wellbeing.

Coast reviews its Child Protection policy annually, and reviews the suitability and effectiveness of child protection practices regularly.