

CHILD SAFE ENVIRONMENT POLICY

INTRODUCTION

This policy describes Walford Anglican School for Girls' approach to establishing, maintaining and continually strengthening a child safe environment.

Walford acknowledges that every child and young person has the right to be safe, feel safe, be heard, and be protected from harm or risk of harm. The safety, wellbeing and protection of children and young people are paramount at Walford.

All members of the School community share responsibility for creating and maintaining a child safe culture. Governors, staff, volunteers, contractors and any person who performs work at Walford are required to understand and comply with this policy.

PURPOSE

The purpose of this policy is to:

- affirm Walford's commitment to the safety, wellbeing, dignity, participation and voice of all children and young people;
- describe the principles, practices and responsibilities that support a child safe culture across the School;
- ensure that all members of the School community understand their obligations to prevent, identify, report and respond to harm or risk of harm;
- support mandatory notifiers to meet their legal obligations, including reporting suspicions that a child or young person is, or may be, at risk of harm;
- ensure that concerns, disclosures, complaints and allegations relating to child safety are responded to promptly, sensitively, fairly and in accordance with the law;
- support safe recruitment, screening, induction, supervision, training and professional conduct of staff, volunteers, contractors and third-party providers;
- promote safe physical, online, learning, co-curricular, boarding and community environments;
- empower children and young people to understand their rights, participate in decisions that affect them, and know how to seek help if they do not feel safe; and
- ensure Walford complies with its legal and regulatory obligations, including those relating to child safe environments, mandatory reporting, Working with Children Checks, privacy, school registration and the National Principles for Child Safe Organisations.

This policy should be read together with Walford's Staff Code of Behaviour, Reporting Suspicions of Child Abuse / Mandatory Notification procedures, Screening and Criminal History Checks Policy, Volunteers Policy, Privacy Policy, Acceptable Use of ICT policies, Critical Incident Policy, Handling Parent Complaints Policy, Parent Code of Behaviour, Student Behaviour Support procedures and other relevant School policies.

SCOPE

This policy applies to all children and young people enrolled at, attending, visiting or participating in the programs, activities and services of Walford Anglican School for Girls, including students in the Early Learning Centre, Junior School, Middle School, Senior School and Boarding House.

Some Walford students may be 18 years of age or older while enrolled at the School or participating in School activities. Schools and teachers have a duty to take reasonable care to protect all students, including those aged 18 years and over, from reasonably foreseeable risks of harm while they are involved in school activities or present for the purpose of a school activity. While South Australian child safe environment and child protection legislation defines a child or young person as a person under 18 years of age, Walford's duty of care, student wellbeing obligations, professional boundary expectations

and safe conduct requirements apply to all students, including students who are 18 years of age or older.

This policy applies to:

- all students, including students aged 18 years and over;
- all staff, including teaching staff, school services staff, casual staff, relief staff, boarding staff and early learning staff;
- all volunteers, including parent volunteers, community volunteers, coaches, mentors, tutors, excursion helpers and members of the Council of Governors and Council sub-committees;
- all contractors, subcontractors, consultants, service providers and third-party providers who work with children and young people, work in proximity to children and young people, or access records relating to children and young people;
- parents, caregivers, guardians and families, to the extent that they participate in the life of the School or are present at School activities, events or services;
- visitors and other individuals involved with the School, whether or not they work directly with children and young people; and
- all members of the Council of Governors and relevant sub-committees.

This policy applies in all School environments and contexts, including:

- on School premises, including the Early Learning Centre, classrooms, playgrounds, specialist learning areas, sporting facilities, administration areas and the Boarding House;
- during School programs, learning activities, pastoral care, co-curricular activities, sport, performances, rehearsals, Chapel, assemblies and community events;
- at excursions, camps, tours, exchanges, outdoor education programs, work experience, service learning, competitions and other off-site activities organised by or connected with the School;
- during boarding activities, casual boarding, full-time boarding, weekly boarding, leave arrangements and other residential contexts connected with the School;
- in online and digital environments used for School-related learning, communication, administration or community engagement, including School systems, email, learning platforms, messaging services, video conferencing, social media, artificial intelligence tools and other digital platforms;
- when students, staff, volunteers, contractors, parents or other members of the School community are representing the School or participating in School-related activities; and
- in any other circumstance where the School owes a duty of care, has child safety responsibilities, or where conduct may affect the safety, wellbeing or participation of a student or child or young person connected with the School.

This policy applies irrespective of whether the concern, disclosure, allegation or conduct occurs on or off School premises, during or outside ordinary School hours, in person or online, where there is a relevant connection to the School, a student, or the safety and wellbeing of children and young people in the School community.

The School will not seek to regulate all private conduct of students or families; however, it may take reasonable action where out-of-school conduct has a relevant connection to the School, affects student safety or wellbeing, or gives rise to a duty of care or legal obligation.

Nothing in this policy limits a person's obligation to make a mandatory notification, contact SAPOL, call 000 in an emergency, or take reasonable action to protect a child, young person or student from harm or risk of harm.

DEFINITIONS

Child or young person

A person under 18 years of age. At Walford, this includes children enrolled in the Early Learning Centre, students in Reception to Year 12, boarders, international students, visiting children and young people, and any other child or young person participating in a School activity, program or service.

Student

Any person enrolled at Walford or participating in a School program, activity or service as a student, including a student who is 18 years of age or older.

Child safe environment

An environment in which children and young people are protected from harm or risk of harm, feel respected and valued, are encouraged to reach their full potential, and are heard.

Child safety and wellbeing

The protection of children and young people from harm or risk of harm, together with the promotion of their physical, emotional, psychological, cultural, spiritual, social and educational wellbeing.

Harm

Physical or psychological harm, whether caused by an act or omission. Harm includes harm caused by sexual, physical, mental or emotional abuse or neglect.

Risk of harm

A risk that a child or young person has suffered, is suffering, or may suffer harm. Risk of harm may arise from a person's conduct, an omission, an unsafe environment, concerning circumstances, or a pattern of behaviour or conditions affecting the child or young person. Risk of harm is concerned with the impact of behaviour, omission or conditions on the child or young person.

Abuse and neglect

Forms of harm or risk of harm that may include physical abuse, sexual abuse, emotional or psychological abuse, neglect, exposure to family or domestic violence, grooming, exploitation, or other conduct or circumstances that compromise the safety or wellbeing of a child or young person.

Mandatory notification

The legal requirement imposed on certain people to report a suspicion, formed on reasonable grounds, that a child or young person is, or may be, at risk of harm. In South Australia, reports are made to the Child Abuse Report Line.

Mandated notifier

A person who is required by law to notify the Department for Child Protection if they suspect on reasonable grounds that a child or young person is, or may be, at risk of harm, where that suspicion is formed in the course of their employment or voluntary work.

Reasonable suspicion

A suspicion based on information, observations, disclosures, patterns of behaviour or circumstances that would cause a reasonable person to suspect that a child or young person is, or may be, at risk of harm. A person does not need proof that harm has occurred before making a mandatory notification.

Child Abuse Report Line, or CARL

The South Australian reporting service for notifying the Department for Child Protection of a suspicion that a child or young person is, or may be, at risk of harm.

Working with Children Check, or WWCC

A statutory screening check for people who work or volunteer with children and young people in South Australia. Suitability for child-related work must be determined through a valid, not-prohibited Working with Children Check.

Prescribed position

A position that requires a person to have a valid, not-prohibited Working with Children Check under the Child Safety (Prohibited Persons) Act 2016 (SA). This may include employees, volunteers, contractors, subcontractors, self-employed persons, ministers of religion, practical placement students and others who work with children and young people or have access to their records.

Prescribed person

An adult who is an employee of an institution, or who carries out work for an institution, including as a contractor, volunteer, self-employed person, minister of religion, or person undertaking practical training.

Volunteer

A person who provides services or assistance to the School without payment. This may include parent volunteers, community volunteers, Council and sub-committee members, coaches, mentors, excursion helpers and other people assisting with School activities.

Contractor or third-party provider

A person or organisation engaged by the School to provide services, programs, activities, works or support. This includes contractors and third-party providers who work directly with children and young people, work in proximity to children and young people, or access records relating to children and young people.

Staff

All people employed by Walford, including teaching staff, school services staff, casual staff, relief staff, boarding staff, early learning staff, executive and administrative staff.

School community

Students, children and young people, staff, Council members, volunteers, contractors, third-party providers, parents, caregivers, families, old scholars, visitors and other people involved in School activities or services.

Parent

A parent, caregiver, guardian or other person who has parental responsibility for a child or young person, or who is otherwise authorised to act in relation to the child or young person's care, education or wellbeing.

Complaint

An expression of dissatisfaction with a real or perceived situation, outcome, decision, conduct, omission, service or failure to act. In a child safety context, a complaint may include a concern, disclosure, allegation or report relating to the safety, wellbeing or conduct affecting a child or young person.

Complainant

A person who makes a complaint, raises a concern, makes a disclosure or reports an allegation.

Disclosure

The act of a child or young person, or another person, telling someone about harm, risk of harm, unsafe behaviour, inappropriate conduct, or a concern about safety or wellbeing.

Grooming

Behaviour that seeks to establish trust, control, secrecy or emotional connection with a child or young person, their family or an organisation for the purpose of facilitating sexual abuse, exploitation or other harm. Grooming may occur in person or online.

Professional boundaries

The limits and expectations that guide appropriate relationships and interactions between adults and children or young people in education and care settings. Professional boundaries help protect children and young people, staff and the School community by ensuring interactions are transparent, authorised, timely, purposeful and consistent with the adult's role.

Reportable child safety concern

Any concern, disclosure, allegation, observation or information that suggests a child or young person is, or may be, at risk of harm, or that an adult's conduct may be inconsistent with this policy, the Staff Code of Behaviour, professional boundaries or child safe practices.

Online environment

Any digital or technology-enabled environment used for School-related learning, communication, administration or community engagement. This includes School systems, email, learning platforms, messaging services, video conferencing, social media, artificial intelligence tools, cloud services, personal devices used for School purposes and other digital platforms.

Procedural fairness

A fair process for managing complaints, allegations or concerns. Procedural fairness generally includes informing a person of the substance of concerns about them, giving them a reasonable opportunity to respond, considering relevant information fairly and without bias, and making decisions based on available evidence. Procedural fairness must be applied in a way that does not compromise child safety, mandatory reporting obligations, police involvement or other legal requirements.

Vulnerable students

Children and young people who may be at increased risk of harm, or who may require additional support to understand their rights, communicate concerns or access help. This may include students with disability, students in care, Aboriginal and Torres Strait Islander students, culturally and linguistically diverse students, new arrival students, international students, boarders, very young children, students experiencing family violence, students with mental health concerns, LGBTQIA+ students, and students with complex family, medical, learning or wellbeing needs.

STATEMENT OF COMMITMENT TO CHILD SAFETY

Walford Anglican School for Girls is committed to a child safe culture in which the safety, wellbeing, dignity, voice and participation of children and young people are embedded in leadership, governance, relationships and daily practice.

Walford has zero tolerance of harm or risk of harm to children and young people. The School supports the rights of children and young people and will act promptly to prevent, identify, report and respond to harm or risk of harm.

Walford recognises that safe, respectful and caring learning environments are essential for student wellbeing, development and learning.

GUIDING PRINCIPLES

Walford is committed to promoting the safety, wellbeing, dignity, voice and participation of children and young people. Children and young people at Walford are valued, respected, listened to, and encouraged to participate in decisions that affect them.

Walford's approach to child safety is guided by the National Principles for Child Safe Organisations, South Australia's child safe environment requirements, the Australian Student Wellbeing Framework, and the School's Anglican identity, values and duty of care.

Walford is committed to:

- embedding child safety and wellbeing in leadership, governance, culture, decision-making and daily practice;
- taking a preventative, proactive and participatory approach to child safety;
- ensuring that the safety and wellbeing of children and young people are paramount considerations in School activities, policies, procedures and risk management;
- supporting children and young people to understand their rights, participate in decisions affecting them, and be taken seriously;
- ensuring families and the School community are informed and involved in promoting child safety and wellbeing;
- upholding equity and respecting the diverse needs, identities, backgrounds and circumstances of children and young people;
- ensuring that staff, volunteers, contractors and third-party providers are suitable, screened, trained, supported and supervised to reflect child safety and wellbeing values in practice;
- maintaining child-focused processes for raising and responding to concerns, disclosures, complaints and allegations;

- equipping staff, volunteers and relevant members of the School community with the knowledge, skills and awareness required to identify, prevent, report and respond to harm or risk of harm;
- promoting safe physical, online, learning, co-curricular, boarding and community environments;
- regularly reviewing and improving child safe policies, procedures, practices and risk controls; and
- documenting and communicating how Walford keeps children and young people safe.

Walford will meet its legal and regulatory obligations, including those relating to child safe environments, mandatory notification, Working with Children Checks, privacy, school registration, discrimination and student wellbeing. Relevant legislation, standards, frameworks and cross-sector guidelines are listed at the end of this policy.

ROLES AND RESPONSIBILITIES

Maintaining a child safe environment is the responsibility of the Council of Governors, the Principal and of all staff members.

The School will maintain systems and processes for child safe induction, training, supervision, reporting, record keeping, risk management and policy review.

The Council of Governors

The Council of Governors is responsible for:

- promoting a child safe culture through governance, risk oversight and strategic decision-making; ensuring that child safety risks are considered through the School's risk management framework;
- receiving appropriate reporting about child safety compliance, risks and policy review, while maintaining confidentiality;
- ensuring that the Principal is supported and held accountable for implementing child safe systems; and
- ensuring that Governors and relevant sub-committee members meet applicable child safe screening, induction and conduct requirements.

The Principal

The Principal is responsible for:

- Promoting child safety and wellbeing wherever possible and ensuring that child safety is included regularly in staff training.
- Ensuring that child safety and wellbeing is included in the School's curriculum.
- When a mandatory report has been made, assisting staff to complete site documentation, and then signing the mandatory notification record and ensuring this is stored correctly.
- Ensuring that students and staff receive adequate support if involved in a harm or risk of harm situation.
- Ensuring that staff are supported when making a mandatory report.
- Ensuring that staff and volunteers have completed Working with Children Checks and RRHAN-EC training, and that third parties have completed Working with Children Checks where required.

Staff

All Walford staff, including teachers and coaches, are responsible for:

- Signing an agreement with the School which will include confirmation that the policy is understood and that they agree to abide by it.
- Completing RRHAN-EC (Responding to Risks of Harm, Abuse and Neglect – Education and Care) training and providing a current certificate to the School prior to the commencement of duties.
- Providing updated certifications (WWCC, RRHAN-EC, TRBSA) to the School prior to the expiration date.

- Complying with the Staff Code of Behaviour, professional boundaries, Protective Practices, this policy and all related child safe procedures.
- Reporting any suspected harm or risk of harm to the Child Abuse Report Line (CARL) on 13 14 78.
- Advising the Principal when a report is being/has been made (unless the report involves the Principal in which case it should be reported to the Chair of Council).
- When concerning behaviour has been observed, the staff member who witnessed it must alert an appropriate senior staff member.
- Taking prompt action if children and young people have disclosed information about inappropriate behaviours of adults.
- Maintaining confidentiality and sharing information only as authorised or required, including where necessary to protect a child or young person, make a mandatory notification, contact SAPOL, support a student, manage risk, or comply with law.
- Referring public or media enquiries about these matters to the Principal and not publicly comment on them.
- Ensuring one-to-one interactions with students are public or visible, authorised, timely and purposeful, and consistent with the Staff Code of Behaviour, Tutoring Policy and Protective Practices.

Boarding House Staff

Walford recognises that Boarding House staff face a specific challenge in providing an environment which is like home for children and young people in ways that do not compromise their professional boundaries or the welfare of children and young people.

Walford is committed to ensuring that Boarding House staff:

- Follow the Staff Code of Behaviour.
- Have a current Working with Children Check.
- Complete RRHAN-EC (Responding to Risks of Harm, Abuse and Neglect – Education and Care) training and provide a current certificate to the School prior to the commencement of duties.
- Have a current Senior First Aid certificate.
- Complete the Australian Boarding Schools Association's 'Duty of Care' Certificate Course in Student Residential Care within 3 months of employment commencement.

Volunteers

Volunteers will:

- Hold and maintain a current, valid and not-prohibited Working with Children Check where required by law or by the School;
- Complete child safety induction appropriate to the nature of their role;
- Complete RRHAN-EC training where required for their role; and
- Comply with this policy, the Staff Code of Behaviour, the Volunteers Policy and all reasonable directions of the School.

Contractors and third-party providers

Contractors and third-party providers must:

- comply with this policy and all relevant child safe requirements communicated by the School;
- ensure that their personnel meet applicable Working with Children Check, induction, supervision and conduct requirements;
- report child safety concerns in accordance with their legal obligations and Walford's reporting requirements;
- maintain appropriate professional boundaries with children and young people; and
- cooperate with Walford in managing child safety risks, records and investigations.

RECRUITMENT, SCREENING, INDUCTION AND SUPERVISION

Walford is committed to child safe recruitment, selection, screening, induction and supervision practices. The School will take reasonable steps to ensure that all staff, volunteers, contractors and third-party providers who work with children and young people, work in proximity to children and young people, or have access to records relating to children and young people, are suitable and supported to uphold Walford's child safe values and obligations.

Working with Children Checks

A person must not commence work, volunteering or child-related services at Walford in a prescribed position unless the School has verified that the person holds a current, valid and not-prohibited Working with Children Check.

A Working with Children Check is required for all people engaged in prescribed positions, including, where applicable:

- employees;
- volunteers, including parent volunteers and members of the Council of Governors and Council sub-committees;
- contractors, subcontractors and self-employed persons;
- third-party providers;
- coaches, tutors, mentors and co-curricular instructors;
- boarding staff and adults engaged in boarding-related activities;
- practical placement students, trainees and interns; and
- any other person required by law or by the School to hold a Working with Children Check.

Walford will not employ, engage or permit a person to work or volunteer in a prescribed position if the person is prohibited from working with children and young people.

The School will verify Working with Children Checks before commencement and will maintain records of verification, currency and renewal. Individuals are responsible for ensuring that their Working with Children Check remains current and for notifying the School immediately if there is any change to their Working with Children Check status, including if they become a prohibited person or are otherwise restricted from working with children and young people.

Working with Children Checks must be renewed in accordance with legislative requirements. The School will monitor renewal dates and require updated verification before a check expires.

Contractors and third-party providers

Walford requires contractors and third-party providers who work with children and young people, work in unsupervised proximity to children and young people, or access records relating to children and young people, to comply with the School's child safe requirements.

Before commencing work or services, relevant contractors and third-party providers must provide evidence, satisfactory to the School, that required Working with Children Checks have been completed and verified for relevant personnel. The School may also require written confirmation that the contractor or third-party provider has appropriate child safe policies, supervision arrangements, reporting procedures, training and insurance in place.

Where a contractor or third-party provider becomes aware of a concern, disclosure, allegation or suspicion that a child or young person is, or may be, at risk of harm, they must act in accordance with their legal obligations and Walford's child safe reporting requirements.

Additional background checks and risk assessments

In addition to Working with Children Check requirements, Walford may undertake further recruitment, screening and background checks as part of its broader risk-management and suitability assessment processes. These may include:

- face-to-face or online interviews;
- confirmation of identity;
- confirmation of qualifications, registration, licences and professional memberships;
- reference checks, including a reference from the most recent employer where practicable;
- employment history checks;
- teacher registration checks, where applicable;
- National Police Checks, where considered appropriate by the School;
- checks of relevant professional or disciplinary history, where lawful and appropriate; and
- other role-specific checks or assessments relevant to the inherent requirements and risks of the position.

Any National Police Check or additional background check required by Walford is an additional School risk-management measure. It does not replace a Working with Children Check and is not the statutory assessment of whether a person is permitted to work with children and young people in South Australia.

Child safe recruitment practices

Walford's recruitment and selection practices will promote child safety by ensuring that position descriptions, advertisements, interview processes and referee checks reflect the School's commitment to child safety and wellbeing.

Applicants for roles involving children and young people will be required to demonstrate their understanding of appropriate professional boundaries, child safe conduct, mandatory reporting obligations, and the responsibilities associated with working in a school environment.

The School may decline to appoint, engage or continue to engage a person where information obtained through recruitment, screening, reference checking, background checking, induction, supervision or performance management raises a concern about the person's suitability to work with children and young people, or their capacity to comply with Walford's child safe expectations.

Recruitment and screening records

Walford will maintain accurate, current and confidential records of recruitment, screening and child safe compliance matters, including:

- Working with Children Check verification and renewal records;
- teacher registration records, where applicable;
- relevant volunteer, contractor and third-party provider screening records;
- child safety induction and training records;
- reference check and recruitment records, where appropriate;
- records of child safe declarations, acknowledgements and policy sign-offs; and
- records of concerns, reports, allegations or breaches, managed in accordance with Walford's Privacy Policy, records management requirements and legal obligations.

Access to these records will be limited to authorised personnel and managed in accordance with privacy, confidentiality, child safety and employment obligations.

Screening-related decisions

Where information obtained through recruitment, screening, background checking or verification raises a concern about a person's suitability for a role, Walford will consider the information fairly, lawfully and in accordance with procedural fairness, privacy and child safety obligations.

The School may seek further information, decline to appoint or engage a person, vary duties, suspend engagement, or take other reasonable action to manage risk.

A person who is dissatisfied with a School employment, volunteer or engagement decision may raise the matter under the relevant grievance, complaints or contractual process. Nothing in this section limits Walford's obligation to comply with Working with Children Check requirements or to prioritise the safety and wellbeing of children and young people.

EMPOWERING CHILDREN AND YOUNG PEOPLE

Walford will ensure students are informed about trusted adults and support pathways, including how to raise a concern if they do not feel safe.

Walford will make child safety information available to students in age-appropriate and accessible ways, including through pastoral care, wellbeing programs, the Keeping Safe Child Protection Curriculum, visible information about how to seek help, and student-facing resources.

Curriculum and pastoral care strategies

Walford students will be supported to recognise and report harm or risk of harm through the School's pastoral care and wellbeing programs. The school-wide implementation of the Keeping Safe Child

Protection Curriculum, embedded in Walford's learning and wellbeing programs, enables a cohesive, consistent and clear approach to developing four key aspects:

- The right to be safe.
- Relationships.
- Recognising harm or risk of harm and seeking help.
- Protective strategies.

All children and young people will be supported to build positive, respectful relationships with other children and young people and with adults.

All students will have the opportunity to build trusted relationships with adults in the School who can be approached with issues and concerns, such as Heads of House, Chaplain, Counsellor, Heads of School, Wellbeing Coordinator, class teachers and Mentors.

Student voice

Walford encourages students to be actively involved in their education. Student voice allows students to engage, participate, lead and learn. We foster in our students a sense of social justice and develop their self-confidence and the skills to stand up for what they believe is just and fair.

SAFE PHYSICAL, ONLINE, BOARDING AND OFFSITE ENVIRONMENTS

Walford will identify, assess and manage child safety risks in physical, online, boarding, co-curricular and off-site environments.

The School regularly reviews and monitors its physical environment through supervision, yard duty, inspections, maintenance, visibility, access controls and general vigilance.

Walford is committed to creating safer online environments by educating students, staff and families about safe and responsible technology use, cyberbullying, online safety, scams, image-based abuse, artificial intelligence and appropriate digital communication.

Boarding, excursions, camps, tours, exchanges, work experience, co-curricular activities and third-party programs will be planned and supervised with regard to child safety, duty of care, student wellbeing, professional boundaries, communication, transport, accommodation, privacy and emergency response.

Relevant requirements are supported by the Staff Code of Behaviour, Acceptable Use of ICT policies, Anti-Bullying and Harassment policies, Critical Incident Policy, Tutoring Policy, Transport of Students Policy, Volunteers Policy and other relevant procedures.

VULNERABLE STUDENTS AND STUDENTS WITH ADDITIONAL SAFETY NEEDS

Walford recognises that some children and young people may be at increased risk of harm or risk of harm, or may experience additional barriers to seeking help, being heard, understanding their rights or disclosing concerns. Vulnerability may be ongoing, temporary or situational.

Students who may require additional consideration include students with disability, students in care, Aboriginal and Torres Strait Islander students, culturally and linguistically diverse students, students who have recently arrived in Australia, international students, boarders, very young children, students experiencing family violence or trauma, students with mental health or medical needs, LGBTQIA+ students, and students who are socially isolated or experiencing bullying.

Walford will take a proactive and student-centred approach by:

- identifying and considering individual circumstances that may increase vulnerability;
- supporting students to understand their rights and know how to seek help;
- providing accessible, age-appropriate and developmentally appropriate reporting pathways;
- consulting with students, parents and caregivers, and where appropriate external professionals, to understand individual safety, communication, learning and wellbeing needs;
- making reasonable adjustments for students with disability;
- providing culturally safe and respectful support;

- considering the specific needs of boarders, international students and students living away from home;
- ensuring child safety and protective behaviours curriculum and online safety education are inclusive, accessible and responsive to individual circumstances;
- monitoring signs of harm or risk of harm, including where a student may not disclose concerns verbally; and
- providing additional safeguards, support, referrals or safety planning where required.

Walford will listen to students, take their views seriously, and involve them in decisions affecting them wherever appropriate, taking into account their age, maturity, communication needs, safety and best interests.

RESPONDING TO CONCERNS, DISCLOSURES AND ALLEGATIONS

Walford will respond promptly, sensitively, fairly and in accordance with the law to any concern, disclosure, allegation or suspicion that a child or young person is, or may be, at risk of harm.

The safety and wellbeing of the child or young person is the first priority. A concern, disclosure or allegation must always be taken seriously, whether it relates to conduct by a staff member, volunteer, contractor, third-party provider, student, parent, visitor, family member or any other person.

Nothing in this policy prevents or delays a person from making a mandatory notification, contacting SAPOL, calling emergency services, or taking immediate action to protect a child or young person from harm.

Immediate action and emergency response

Where immediate danger, urgent medical assistance or police assistance is required, staff must call 000 and take reasonable steps to protect the child or young person and others from further harm, while ensuring their own safety and the safety of the School community. Where the matter involves alleged criminal conduct, sexual abuse, serious physical harm, violence, grooming, exploitation, threats, or other conduct requiring police involvement, SAPOL should be contacted as appropriate.

The following provides a brief outline of steps to be taken.

- If there is immediate danger or urgent medical or police assistance is required, call 000.
- If a mandated notifier suspects on reasonable grounds that a child or young person is, or may be, at risk of harm, they must report to CARL on 13 14 78 or through eCARL where appropriate.
- If the matter involves alleged criminal conduct, sexual abuse, serious physical harm, threats, grooming, exploitation or violence, contact SAPOL as appropriate.
- Notify the Principal as soon as practicable. If the matter involves the Principal, notify the Chair of the Council of Governors. If it involves the Chair, notify the Deputy Chair.
- Record what was seen, heard and done. Use the child or young person's own words where possible. Do not investigate, confront the alleged person, or promise secrecy.

The Principal, or delegate, should be notified as soon as practicable after emergency action has been taken, unless doing so would compromise the safety of a child or young person or an external investigation.

Mandatory notification to CARL

All mandated notifiers must make a report to the Child Abuse Report Line (CARL – 13 14 78) if they suspect on reasonable grounds that a child or young person is, or may be, at risk of harm, and that suspicion is formed in the course of their employment, role or voluntary work. Where the matter is not an emergency or otherwise requiring immediate telephone contact, reports may be made through eCARL in accordance with CARL guidance.

The obligation to report to CARL is an individual legal obligation. A staff member, volunteer or other mandated notifier must not assume that another person has made, or will make, a report. Walford also expects any person connected with the School, including those who may not be mandated notifiers, to

report child safety concerns promptly to the Principal or appropriate senior staff member, and to CARL or SAPOL where required or appropriate.

A person does not need proof that harm has occurred before making a report. A reasonable suspicion may arise from a disclosure, observation, pattern of behaviour, injury, change in presentation, information from another person, environmental concern, or any other circumstance that causes concern for the safety or wellbeing of a child or young person.

Where a person is unsure whether a report is required, they should seek guidance from CARL, the Principal, a Head of School or another appropriate senior staff member. Seeking guidance must not delay a mandatory notification where the person has formed a reasonable suspicion that a child or young person is, or may be, at risk of harm.

Notification within the School

Where a concern, disclosure, allegation or mandatory notification relates to a child or young person at Walford, the staff member or volunteer should notify the Principal as soon as practicable.

If the concern, disclosure or allegation involves the Principal, the matter should be reported to the Chair of the Council of Governors.

If the concern, disclosure or allegation involves the Chair of the Council of Governors, the matter should be reported to the Deputy Chair.

Internal notification does not replace a mandatory notification to CARL, a report to SAPOL, or a call to 000 where required.

The purpose of internal notification is to enable the School to support the child or young person, manage immediate risks, preserve records, comply with legal obligations, and take appropriate steps in relation to the safety of the School community.

Responding to a disclosure from a child or young person

When a child or young person discloses harm, risk of harm, unsafe behaviour or inappropriate conduct, the adult receiving the disclosure should:

- listen calmly and respectfully;
- reassure the child or young person that they have done the right thing by speaking up;
- avoid expressing shock, disbelief or blame;
- allow the child or young person to use their own words;
- avoid asking leading, suggestive or investigative questions;
- explain that the information may need to be shared with people who can help keep them safe;
- avoid promising secrecy or absolute confidentiality;
- record the disclosure as soon as possible using the child or young person's own words where practicable; and
- report the matter in accordance with this policy and mandatory reporting obligations.

Staff and volunteers must not investigate the disclosure themselves, confront the alleged person, or ask the child or young person to repeat the disclosure unnecessarily.

Support for the child or young person

Walford will take reasonable steps to support the safety, wellbeing, dignity and participation of any child or young person involved in a concern, disclosure, allegation or report.

Support may include:

- immediate safety planning;
- pastoral care or wellbeing support;
- counselling or referral to appropriate internal or external support services;
- academic or attendance adjustments, where appropriate;
- support to participate in processes in an age-appropriate and trauma-informed way;
- communication with parents or caregivers, where appropriate and safe;

- cultural, disability, language or other support to meet the child or young person's needs; and
- ongoing monitoring and review of the child or young person's safety and wellbeing.

The School will consider the views and wishes of the child or young person where appropriate, while recognising that legal obligations and safety considerations may determine what action must be taken.

External investigation and constraints on School action

Where a matter has been reported to CARL, SAPOL, the Department for Child Protection or another external authority, Walford will cooperate with that authority and will take care not to compromise any external investigation.

The School may be required to delay, limit or modify its own internal inquiries or communications at the direction of, or in consultation with, external authorities.

Staff must not:

- conduct their own investigation into suspected harm or criminal conduct;
- interview the child or young person beyond what is necessary to clarify immediate safety and reporting needs;
- confront the person who is the subject of the concern or allegation;
- contaminate or interfere with potential evidence;
- discuss the matter with witnesses or other students unnecessarily; or
- take any action that may compromise a police, child safety or regulatory investigation.

Walford may still take appropriate interim risk-management steps to protect children and young people while an external process is underway. These steps may include changes to duties, supervision arrangements, access restrictions, temporary removal from child-facing activities, communication boundaries, or other measures considered necessary and proportionate in the circumstances.

Procedural fairness

Walford is committed to procedural fairness when responding to concerns, disclosures and allegations. A person who is the subject of a concern or allegation will generally be informed of the substance of the concern and given a reasonable opportunity to respond before findings are made or disciplinary action is taken.

Procedural fairness will be applied in a manner that does not compromise:

- the safety or wellbeing of a child or young person;
- mandatory reporting obligations;
- SAPOL, CARL, Department for Child Protection or other external processes;
- confidentiality and privacy obligations;
- evidence preservation; or
- the School's ability to take interim protective or risk-management action.

The timing and extent of information provided to a person who is the subject of a concern or allegation may be affected by the nature of the matter, advice or directions from external authorities, and the need to protect children and young people from harm or risk of harm.

Allegations involving staff, volunteers, contractors or third-party providers

Where a concern or allegation involves a staff member, volunteer, contractor, third-party provider or other adult engaged by the School, Walford will act promptly to assess and manage any risk to children and young people. This may include:

- ensuring any required report is made to CARL, SAPOL or another authority;
- notifying the Principal, or the Chair of the Council of Governors if the matter involves the Principal, or the Deputy Chair if the matter involves the Chair;
- seeking advice from AISSA, legal advisers, insurers or relevant authorities where appropriate;
- implementing interim protective measures;
- considering employment, contractual, volunteer or access arrangements;
- preserving records and evidence;
- supporting affected children and young people; and

- applying procedural fairness as appropriate.

A breach of this policy, the Staff Code of Behaviour, professional boundaries, mandatory reporting obligations or other child safe requirements may result in disciplinary action, termination of employment or engagement, removal from duties, cessation of volunteer involvement, restriction from School premises or events, or referral to external authorities.

Allegations involving students

Where a concern or allegation involves student behaviour, Walford will respond in a way that prioritises safety, meets legal obligations, and recognises the age, development, rights and wellbeing of all students involved.

The School may respond through child safety, wellbeing, behaviour support, restorative, disciplinary, risk-management or external reporting processes, depending on the nature and seriousness of the matter.

Where student sexual behaviour, violence, harmful behaviour, bullying, harassment, online conduct or other behaviour may indicate harm or risk of harm, staff must consider whether a mandatory notification, SAPOL contact, parent communication, safety plan or external support is required.

Review and follow-up

After responding to a child safety concern, disclosure or allegation, Walford will consider whether further action is required to strengthen child safety. This may include:

- reviewing risk controls;
- updating student support or safety plans;
- reviewing supervision, staffing or access arrangements;
- providing additional training or guidance to staff, volunteers or contractors;
- reviewing relevant policies, procedures or records;
- reporting to the Council of Governors as appropriate, while maintaining confidentiality; and
- implementing improvements to reduce the likelihood of future harm or risk of harm.

RECORDS, PRIVACY AND INFORMATION SHARING

Child safety response records

Walford will maintain secure and accurate records of child safety concerns, disclosures, allegations, mandatory notifications and related actions.

Records should include, where relevant:

- the date, time and location of the concern, disclosure or incident;
- the name and role of the person making the record;
- the name of the child or young person involved;
- the child or young person's own words, where a disclosure has been made;
- observations of behaviour, injury, presentation or other relevant circumstances;
- details of any immediate safety action taken;
- whether CARL, SAPOL, 000, the Principal, Chair of Council or another authority was notified;
- reference numbers or details provided by CARL, SAPOL or another authority;
- any internal risk management, support or follow-up actions; and
- any directions given by external authorities.

Records must be factual, objective, timely and securely stored. They must be managed in accordance with Walford's Privacy Policy, records management practices and legal obligations.

Documentation of any incident and follow up actions (e.g. reports, records of interviews and meetings) will be stored in a confidential file with access to limited personnel.

Communication with parents and caregivers

Walford will usually seek to involve parents or caregivers in matters affecting their child's safety and wellbeing. However, the School may delay or limit communication with parents or caregivers where:

- doing so may place the child or young person or another person at further risk;

- the parent or caregiver is alleged to be involved in the harm or risk of harm;
- SAPOL, CARL, the Department for Child Protection or another authority advises that communication should not occur;
- communication may compromise an external investigation; or
- the School is otherwise required or authorised by law to withhold or limit information.

Where communication with parents or caregivers is appropriate, it will be handled sensitively, with regard to the child or young person's safety, privacy and wellbeing.

Confidentiality and information sharing

Walford will treat child safety information with sensitivity and care. However, confidentiality cannot be absolute where child safety, legal obligations, procedural fairness, external reporting or risk management require information to be shared.

Information about a concern, disclosure, allegation or report will only be shared with people who need to know in order to:

- protect the safety and wellbeing of a child or young person;
- meet mandatory reporting or other legal obligations;
- enable SAPOL, CARL, the Department for Child Protection or another authority to perform its role;
- provide support to the child or young person or other affected persons;
- manage risk to the School community;
- ensure procedural fairness; or
- obtain appropriate professional, legal, insurance, governance or regulatory advice.

Staff, volunteers, contractors and other members of the School community must not discuss child safety matters with unauthorised persons, including other staff, parents, students or community members.

POLICY AND RISK REVIEW

The Child Safe Environment Policy is reviewed and updated every two years. It is approved and endorsed by the Council of Governors and is published on the School website, the parent portal and on the School policy platform.

The policy will also be reviewed and updated when the School:

- Expands the services it offers to children and young people;
- Undergoes a substantial change to the responsible or managing authority; or
- Experiences an event or incident where children or young people were or could have been at risk of harm.

To help maintain a safe environment for children and young people, Walford will review its risks regularly and implement strategies to minimise and manage these risks.

When this policy or related child safe procedures are reviewed and updated, Walford will lodge a new Child Safe Environments Compliance Statement with the SA Department of Human Services, as required.

LEGISLATIVE CONTEXT

[Children and Young People \(Safety\) Act 2017](#)

[Child Safety \(Prohibited Persons\) Act 2016](#)

[Statutes Amendment \(Child Sexual Abuse\) Act 2021](#)

[Criminal Law Consolidation Act 1935 \(SA\)](#)

[Equal Opportunity Act 1984 \(SA\)](#)

[Sex Discrimination Act 1984 \(Cth\)](#)

[Teacher Registration and Standards Act 2004 \(SA\)](#)

[Education and Early Childhood Services \(Registration and Standards\) Act 2011\(SA\)](#)

[Australian Education Act 2013 \(Cth\)](#)

[Education Services for Overseas Students Act 2000 \(including National Code of Practice for Providers of Education and Training to Overseas Students 2018\)](#)
[Disability Discrimination Act 1992 \(Cth\)](#)

CONVENTIONS AND PRINCIPLES

[National Principles for Child Safe Organisations](#)
[United Nations Convention on the Rights of the Child](#)

STANDARDS AND FRAMEWORKS

[Australian Student Wellbeing Framework](#)
[National Quality Framework](#)
[Safe & Supported: The National Framework for Protecting Australia's Children 2021 - 2031](#)
[Disability Standards for Education 2005](#)
[Homestay Standards](#)

CROSS-SECTOR GUIDELINES

[Protective Practices for staff in their interactions with children and young people](#)
[Managing allegations of sexual misconduct in SA education and care settings](#)
[Responding to problem sexual behaviour in children and young people](#)
[Suicide Postvention Guidelines](#)

SCHOOL POLICIES

[Staff Code of Behaviour](#)
[Drugs and Alcohol in the Workplace Policy](#)
[Behaviour Support Policy](#)
[Anti-Bullying and Harassment Policy \(Whole School\)](#)
[Anti-Bullying and Harassment Policy \(Students\)](#)
[Critical Incident Policy](#)
[Reporting Suspicions of Child Abuse \(Mandatory Notification\)](#)
[Acceptable Use of ICT \(Students\)](#)
[Acceptable use of ICT \(Staff\)](#)
[Work Health Safety Policy](#)
[Screening and Criminal History Checks](#)
[Volunteers Policy](#)
[Tutoring Policy](#)
[Transport of Students Policy](#)
[Privacy Policy](#)
[Parent Code of Behaviour](#)

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