

Child Safety – Integrity Business College

1.0 Purpose

1.1 This policy outlines how Integrity Business College (IBC) will take appropriate actions to:

- Facilitate the prevention of child abuse occurring within the organisation.
- Work towards an organisational culture of child safety and prevention of child abuse.
- Ensure that all parties are aware of their responsibilities for identifying possible occasions for child abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs.
- Provide guidance to staff/volunteers/contractors as to action that should be taken where they suspect any abuse within or outside of the organisation.
- Provide assurance that any and all suspected abuse will be reported and fully investigated.

1.2 It complies with the Education and Training Reform Act 2006, Child Wellbeing and Safety Act 2005 (Vic) Child Safe Standards – Managing the Risk of Child Abuse in Schools, Ministerial Order No 870. See section 5 for a full list of relevant legislation and standards.

2.0 Responsibilities

2.1 Managing Director. It is the MD's responsibility to:

- determine whether a breach in privacy is justified to ensure the safety and well-being of a minor child and implement an external intervention; and
- through the Operational Manager, to ensure that all employees, operations support contractors, external providers and partners meet the obligations of this policy and the Working with Children (Criminal Record Checking) Act 2004;

2.2 The Operations Manager will act as Child Safety Officer. In the absence of the MD, it is the Child Safety Officer's responsibility to:

- determine whether a breach in privacy is justified to ensure the safety and well-being of a minor child and make a report for external intervention under Mandated Notification Child Protection Policy
- ensure that all employees, contractors, external providers and partners meet the obligations of this policy and the Act;

3.0 Scope

3.1 This policy, from the date of endorsement, applies to all people involved in the organisation, including:

- students
- trainers (permanent and casual)
- contractors
- all staff
- indirect service providers
- any other individual involved in this organisation

4.0 Principles

4.1 All students under eighteen (18) years of age, who enrol or enquire about enrolment at IBC have a right to feel and be safe.

4.2 IBC's Commitment to child safety in response to 2022 the National Child Safety Standards:

- IBC is committed to the safety, participation and empowerment of all students as.
- IBC have zero tolerance of child abuse, and all allegations and safety concerns will be treated very seriously and consistently within the guidelines of our robust policies and procedures.
- IBC have legal and moral obligations to contact authorities when concerned about the safety of a student under the age of 18.
- IBC is committed to preventing child abuse and identifying risks early, and removing and reducing these risks.
- IBC has robust human resources and recruitment practices for all staff, including the requirement of Working With Children checks relevant for the state or territory the trainer and student are located.
- IBC is committed to regularly training and educating our staff on child safety in the online environment.
- IBC supports and respects all students and staff. We are committed to the cultural safety of Aboriginal students, the cultural safety of students from a culturally and/or linguistically diverse backgrounds, and to providing a safe online environment for students with a disability.

4.3 Students at IBC

This policy is intended to empower all students to report any issues with trainers and/or the workplace. IBC involves students when making decisions, especially about matters that directly affect them. IBC listens to their views and respect what they have to say. IBC promotes diversity and tolerance in our organisation, and people from all walks of life and cultural backgrounds are welcome. In particular we:

- promote the cultural safety, participation and empowerment of Aboriginal students

- promote the cultural safety, participation and empowerment of students from culturally and/or linguistically diverse backgrounds
- ensure that students with a disability are safe and can participate equally.

IBC will:

- Take a preventative, proactive and participatory approach to child safety;
- Implement child safety policies and procedures which support ongoing assessment and amelioration of risk;
- Value and empower students to participate in decisions which affect their lives;
- Foster a culture of openness that supports all persons to safely disclose risks of harm to students;
- Respect diversity in cultures and child rearing practices while keeping child safety paramount;
- Provide written guidance on appropriate conduct and behaviour towards students by both students and trainers;
- Engage only the most suitable people to work with students and have high quality professional development to support this;
- Ensure students know who to talk with if they are worried or are feeling unsafe, and that they are comfortable and encouraged to raise such issues;
- Report suspected abuse, neglect or mistreatment promptly to the appropriate authorities;
- Share information appropriately and lawfully with other organisations where the safety and wellbeing of students is at risk; and
- Value the input of and communicate regularly with employers and families.

5.0 Legislative Framework

5.1 Providing services nationally IBC has implemented a Child Safe framework aligned to national, state and territory legislative requirements including, but is not limited to:

Jurisdiction	Name of legislation/standard
Australia	<i>Crimes Act 1914</i> <i>Criminal Code Act 1995</i> <i>Privacy Act 1988</i> <i>Public Service Act 1999</i> <i>National Principles for Child Safe Organisations</i> <i>Online Safety Act 2021</i>

Jurisdiction	Name of legislation/standard
	<u>Commonwealth Child Safe Framework</u>
ACT	<u>Working With Vulnerable People (Background Checking) Act 2011</u> <u>Working With Vulnerable (Background Checking) Amendment Act 2019</u>
NSW	<u>Child Protection (Working With Children) Act 2012</u>
NT	<u>Care and Protection of Children Act 2007</u>
QLD	<u>Child Protection Act 1999</u> <u>Working with Children (Risk Management and Screening) Act 2000</u>
SA	<u>Children and Young People (Safety) Act 2017</u>
TAS	<u>Education and Care Services National Law (Application) Act 2011</u> <u>Registration to Work with Vulnerable People Act 2013</u>
VIC	<u>Working With Children Act 2005</u> <u>Child Wellbeing and Safety Amendment (Child Safe Standards) Act 2015 (VIC);</u> <u>Child Protection Standards - July 2022</u>
WA	<u>Working With Children (Criminal Record Checking) Act 2004</u>
International	<u>The United Nations Convention on the Rights of the Child</u> <u>Geneva Declaration of the Rights of the Child</u>

6.0 Staff Procedures

6.1 Code of Conduct

All members are made aware of, and must abide by, our Code of Conduct.

6.2 Child Safety Officer

IBC has appointed a Child Safety Officer for its operations, being the designated person to hear or to be informed about all the allegations or concerns, and providing support to other personnel.

6.3 Child Abuse

Reporting child abuse is a community-wide responsibility. Child abuse includes any act committed against a child involving:

- Physical violence;
- Sexual offences;
- Serious emotional or psychological abuse; and
- Serious neglect

IBC personnel are required to report to police if they know or reasonably believe that a sexual offence has been committed by an adult against a child under the age of 16. It is a criminal offence (failure to disclose) to fail to comply with this obligation across jurisdictions.

6.4 What is a 'reasonable belief'?

A 'reasonable belief' is not the same as having proof. A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds. For example, a 'reasonable belief' might be formed when:

- A child states that they have been sexually abused;
- A child states that they know someone who has been sexually abused (sometimes the child may be talking about themselves);
- Someone who knows a child states that the child has been sexually abused;
- Observations of the child's behaviour or development leads to a belief that the child has been sexually abused; or
- Signs of sexual abuse lead to a belief that the child has been sexually abused.

A reasonable belief is a deliberately low threshold. This enables authorities to investigate and take action.

If a person 16 years or older provided you with the information and they do not have an intellectual disability and they do not want the information reported to the police, an individual is then not required to report to police.

IBC will not tolerate incidents of child abuse. All personnel understand their obligation to notify relevant authorities as soon as practicable if they have a reasonable suspicion that a minor has been, or is being, abused or neglected by a member of their family or any other individual:

6.5 Recruitment Practices

IBC takes all reasonable steps to ensure that it engages the most suitable and appropriate people to work with our students. We employ a range of screening measures and apply best practice standards in the screening and recruitment of employees.

We interview and conduct referee checks on all employees. Valid Working With Children cards are required for all employees having direct/online contact with students under the age of 18 if they:

- have regular contact with young people and is not directly supervised at all times;
- work in close proximity to young people on a regular basis and is not directly
- have access to sensitive records relating to young people.

Exemptions from this requirement may apply in some circumstances.

IBC will ensure that criminal history information is dealt with in accordance with the Child Safe Environments: Standards for dealing with information obtained about the criminal history of employees who work with children, issued pursuant to Section 8A, Children's Protection Act 1993.

6.6 Support for Employees

IBC seeks to attract and retain the best employees. We provide support so people feel valued, respected and fairly treated. We ensure that employees who work with young people have ongoing support and training so that their capacity is developed and enhanced to promote the establishment and maintenance of a safe online environment for our students.

Strategies we have implemented include:

- All new employees undergo induction and receive a copy of our child safe policy and sign our code of conduct.
- All employees receive regular sessions that include a focus on ongoing learning about child protection and other matters that affect students.

6.7 Fair Procedures for Staff

In addition to making a report to the Child Abuse Report Line, employees must also report to the Operations Manager if reasonable suspicion is formed that a child has been, or is being, abused or neglected by another employee.

In response to any report to the Operations Manager concerning a member, or employee of IBC disciplinary action will be taken.

Other protective actions may also be introduced to ensure the safety of young people within our organisation.

Examples of strategies to minimise risk include the development of further policies and procedures which may address (but are not limited to):

- Taking images of young people
- Complaints procedures around safety
- Procedure for breaches of policy
- Training/cyber safe guidelines
- Protecting privacy and confidentiality in issues around child safety
- Procedures for dealing with situations where a member is being investigated for, or is charged with, a serious criminal offence.

Evaluation of these strategies and the development of additional strategies to minimise and control risks to children and young people occur as part of our ongoing risk management process.

6.8 Allegations, Concerns and Complaints

IBC takes all allegations seriously and has practices in place to investigate thoroughly and quickly. Personnel are trained to deal appropriately with allegations. We work to ensure all students and personnel know what to do and who to tell if they observe abuse or are a victim. We all have a responsibility to report an allegation of abuse if we have a reasonable belief that an incident took place.

6.9 Supporting Young People and their Families

Child Protection is everyone's responsibility. IBC recognises that even where a report is made, we may still have a role in supporting the young person. This support may include:

- Referring the young person or their family to other appropriate services.

6.10 Mandatory Reporting

Information about making appropriate reports of abuse or neglect is available from the state or territory website listed. All employees understand their obligation to notify the appropriate authority as soon as practicable if they have a reasonable suspicion that a child has been, or is being, abused or neglected and should be reported to the Child Safety Officer via email noted 'Strictly Confidential' in the subject bar. IBC will not tolerate incidents of child abuse.

State	Further information on mandatory reporting
Australia	From 20 March 2020: Criminal Code Act 1995 Div 273B (Protection of children)
ACT	https://www.communityservices.act.gov.au/ocyfs/children/child-and-youth-protection-services/report-child-abuse-and-neglect Phone: 1300 556 728 Email the ACT Child Protection team at childprotection@act.gov.au
NSW	https://reporter.childstory.nsw.gov.au/s/ Email the NSW ChildStory Reporter team at childstory.support@facs.nsw.gov.au Phone: 1300 356 696
NT	https://nt.gov.au/law/crime/report-child-abuse You can report suspected child abuse to: <ul style="list-style-type: none"> • Police on 131 444 or the local police station • the child abuse hotline on 1800 700 250 • Crime Stoppers on 1800 333 000
QLD	https://www.csyw.qld.gov.au/child-family/protecting-children/about-child-protection/mandatory-reporting If you have a reason to suspect a child in Queensland is experiencing harm, or is at risk of experiencing harm or being neglected, contact Child Safety Services and talk to someone about your concerns: <ul style="list-style-type: none"> • During normal business hours contact the Regional Intake Service:

	<p>Brisbane: 1300 682 254</p> <p>South East Queensland: 1300 679 849</p> <p>South West Queensland: 1300 683 390</p> <p>North Coast: 1300 703 921</p> <p>North Queensland: 1300 706 147</p> <p>Central Queensland: 1300 703 762</p> <p>Far North Queensland: 1300 684 062</p> <p>After hours and on weekends – contact the Child Safety After House Service Centre on 1800 177 135 (24 hours a day).</p>
SA	<p>https://www.childprotection.sa.gov.au/reporting-child-abuse</p> <p>To report a suspected case of child abuse or neglect call the Child Abuse Report Line (CARL): 13 14 78.</p>
TAS	<p>https://www.dhhs.tas.gov.au/children/child_protection_services/what_can_i_expect_when</p> <p>If you have concerns for the safety or welfare of a child, call the Advice and Referral Line on 1800 000 123.</p>
VIC	<p>https://providers.dhhs.vic.gov.au/mandatory-reporting</p> <p>To make a report contact the child protection intake service covering the local government area where the child normally resides.</p> <p>Telephone during business hours Monday to Friday</p> <ul style="list-style-type: none"> • North Division intake: 1300 664 977 • South Division intake: 1300 655 795 • East Division intake: 1300 360 391 • West Division intake - metropolitan: 1300 664 977 • West Division intake - rural and regional: 1800 075 599
WA	<p>https://mandatoryreporting.dcp.wa.gov.au/Pages/Home.aspx</p> <p>Anyone who is concerned that a child is suffering any form of abuse or neglect within the Metro area should report their concerns to the Department through the Central Intake Team on 1800 273 889 or email the Central Intake Team on CPDUTY@cpfa.wa.gov.au</p>

8.0 Review Date

12 months from the date of this version, or as required.

Definitions:

Child means a person below the age of 18 years unless, under the law applicable to the child, majority is attained earlier.

Child protection means any responsibility, measure or activity undertaken to safeguard children from harm.

Child abuse means all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial (e.g. for financial gain) or other exploitation of a child and includes any actions that results in actual or potential harm to a child.

Child sexual assault is any act which exposes a child to, or involves a child in, sexual processes beyond his or her understanding or contrary to accepted community standards. Sexually abusive behaviours can include the fondling of genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling of breasts, voyeurism, exhibitionism, and exposing the child to or involving the child in pornography. It includes child grooming, which refers to actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child to lower the child's inhibitions in preparation for sexual activity with the child.

Reasonable grounds for belief is a belief based on reasonable grounds that child abuse has occurred when all known considerations or facts relevant to the formation of a belief are taken into account and these are objectively assessed. Circumstances or considerations may include the source of the allegation and how it was communicated, the nature of and details of the allegation, and whether there are any other related matters known regarding the alleged perpetrator.

A reasonable belief is formed if a reasonable person believes that:

- (a) The child is in need of protection,
- (b) The child has suffered or is likely to suffer "significant harm as a result of physical injury",
- (c) The parents are unable or unwilling to protect the child.

A 'reasonable belief' or a 'belief on reasonable grounds' is not the same as having proof, but is more than mere rumour or speculation. A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds. For example, a 'reasonable belief' might be formed if:

- a) A child states that they have been physically or sexually abused;
- b) A child states that they know someone who has been physically or sexually abused (sometimes the child may be talking about themselves);
- c) Someone who knows a child states that the child has been physically or sexually abused;
- d) Professional observations of the child's behaviour or development leads a professional to form a belief that the child has been physically or sexually abused or is likely to be abused; and/or
- e) Signs of abuse lead to a belief that the child has been physically or sexually abused.