

# Child Safety and Wellbeing Policy

## **Purpose:**

The Child Safe Standards (the Standards) commenced in Victoria in January 2016. Changes are being introduced on 01 July 2022 to make the Standards even stronger. The new Standards set out minimum requirements and outline the actions organisations must take to keep children and young people safe.

ISA Student Advocates are a national provider of ancillary support services to visiting international students.

Our team is dedicated to the holistic support and development of students and nurtures and supports their interests, empowering them through academic and personal growth. We are committed to the continual development of inclusive practices. Child protection is a shared responsibility between ISA, all employees, contractors, volunteers and associates.

## **Scope:**

This policy and practices have been developed to keep our students safe, including from abuse or other harm. It applies to:

- all ISA staff, volunteers, and service providers whether they work in direct contact with students.
- applies in all physical and on-line environments used by students during or outside of school hours, including other locations provided for a student's use (for example, a school camp) and those provided through third-party providers
- should be read together with our other child safety and wellbeing policies, procedures and codes – refer to the related policies section below

## **Definitions:**

The following definitions are gleaned from Child Safe Standards – Definitions (<https://www.vic.gov.au/child-safe-standards-definitions>)

- child
- child safety
- child abuse
- child-connected work
- grooming
- mandatory reporting
- reportable conduct
- student

- volunteer

### **Statement of Commitment to Child Safety and Wellbeing:**

Our Child Safe Policy demonstrates our strong commitment to child safety and wellbeing and to creating and maintaining a child safe and child-friendly environment. All children and young people have a right to feel and be safe. ISA is committed to providing a child safe and child friendly environment, where children and young people are safe and feel safe and can actively participate in decisions that affect their lives. We have a zero tolerance for child abuse and other harm and are committed to acting in students' best interests and keeping them safe from harm. ISA regard its child protection responsibilities with the utmost importance and as such is committed to providing the necessary resources to ensure compliance with all relevant child safety and wellbeing laws and regulations and maintaining a child safe culture. All ISA staff has a responsibility to understand the important and specific role that they play individually and collectively to ensure that the wellbeing and safety of all students is at the forefront of all that they do and every decision that they make.

ISA has developed specific child safe principles and values relevant to its own specific circumstances that guide our work systems, practices, policies and procedures to protect students from abuse and harm.

### **Roles and Responsibilities:**

ISA Student Advocates Managing Director has ultimate responsibility for ensuring: -

- A strong child safe culture, in all environments, is created and maintained.
- Child safety and wellbeing strategies, policies, practices and codes are effectively developed, in place, communicated and adhered to.
- Ensuring that appropriate and effective child safety risk management and internal controls systems are in place and effective; and
- Ensuring that child safety is a regular agenda item at internal meetings and that the ISA management team report regularly to the managing director on child safety and wellbeing matters, including the implementation and maintenance of strategies to retain a child safe environment and culture.

The Managing Director will:

- Deal with and investigate reports of child abuse.
- Appoint appropriate Child Safety Officers to act as a clearly identifiable support network for all students, parents, Staff and anyone in our community that has a concern about the safety of a child in our care.
- Provide support for Staff, service providers and volunteers in undertaking their child protection responsibilities

ISA management team is responsible for:

- Ensuring effective child safety and wellbeing policies, procedures, codes of practice are in place, communicated to ISA staff and followed.
- Modelling a child safe culture that facilitates the active participation of students, families and Staff in promoting and improving child safety, cultural safety and wellbeing.
- Enabling inclusive practices where the diverse needs of all students are considered.
- Reinforcing high standards of respectful behaviour between students and adults, and between students; and
- Ensuring that all Staff, contractors (service providers) and volunteers are aware of relevant laws, organisational policies and procedures, and their obligation to observe the ISA's Code of Conduct (particularly as it relates to child safety and protection)
- Facilitating regular education for Staff, volunteers and parents (where appropriate) to build deeper understandings of child safety, cultural safety, student wellbeing and prevention of responding to abuse

ISA Caregivers are responsible for:

- Modelling a child safe culture that facilitates the active participation of students, families and Staff in promoting and improving child safety, cultural safety and wellbeing.
- Enabling inclusive practices where the diverse needs of all students are considered.
- Reinforcing high standards of respectful behaviour between students and adults, and between students
- Creating an environment where child safety complaints and concerns are readily raised and no-one is discouraged from reporting an allegation of child abuse to relevant authorities.
- Assessing the possible risks of child abuse within their area of control and eradicating/minimising any risk to the extent possible

All ISA staff, volunteers and service providers will:

- Participate in child safety and wellbeing induction and training provided by ISA, and always follow ISA's child safety and wellbeing policies and procedures.
- Act in accordance with our Code of Conduct.
- Identify and raise concerns about child safety issues in accordance with our Responding to Concerns of Child Abuse Neglect and Safety procedures, including following the PROTECT Four Critical Actions for Schools.
- Ensure students' views are taken seriously and their voices are heard about decisions that affect their lives.

- Implement inclusive practices that respond to the diverse needs of students.
- Support or assist children who disclose child abuse or are otherwise linked to suspected child abuse.
- Provide an environment that is supportive of all children’s emotional and physical safety. Fulfilling the roles and responsibilities contained in this policy does not displace or discharge any other legal obligations that arise if a person reasonably believes that a child is at risk of child abuse

#### **Code of Conduct:**

ISA’s Code of Conduct sets the boundaries and expectations for appropriate behaviours between adults and students. It also clarifies behaviours that are not acceptable in our physical and on-line environments. All Staff, service providers and volunteers working directly with children are required to read, agree to and abide by the Code of Conduct. We ensure that students also know what is acceptable and what is not acceptable so

#### **Managing risks to child safety and wellbeing:**

We identify, assess and manage risks to child safety and wellbeing in our physical and on-line environments. These risks are managed through all our internal policies, procedures and practices, and in our activity specific risk assessments of accommodation facilities and services we contract through third party providers. We identify and manage the risks in our on-line environments through our IT policies, ISA maintains a Child Safety Risk Register which is used to record any identified risks related to child abuse and safety alongside actions in place to manage those risks. ISA’s management team monitor and evaluate the effectiveness of the actions in the Child Safety Risk Register at least annually.

#### **Establishing a culturally safe environment:**

ISA primarily engages with international families and students from diverse cultural and linguistic backgrounds. ISA also values and respects the cultural diversity of our students and is committed to ensuring that backgrounds of all students are sensitively recognised, catered for, celebrated and valued so that cultural differences do not compromise students’ safety and wellbeing. For Aboriginal and Torres Strait Islander students, we are committed to establishing an inclusive and culturally safe place where the strengths of their culture, values and practices are respected. We recognise the link between Aboriginal culture, identity and safety and actively create opportunities for Aboriginal students, families and culture to have a voice and presence in our community.

#### **Student empowerment and participation:**

ISA recognises that our students are at the forefront of all we do. Their input, participation and empowerment to actively engage in processes and structures is integral to our democratic principles and statements on equity and inclusion. All children and students should feel safe, be safe, and be informed and empowered to speak up about any personal safety and wellbeing issue

We recognise the importance of friendships and support from peers to help children and students feel safe and be less isolated. Staff are trained to signs of harm and will actively facilitate child-friendly ways for children and students to express their views, raise their concerns and participate in decisions affecting them. The views of children and students will always be taken seriously and their concerns are addressed in a just and timely manner.

### **Family engagement:**

ISA recognises that parents and guardians have the primary responsibility for the upbringing and development of their children. ISA will involve parents and guardians in decisions related to child safety and wellbeing which affect their child. Our families have an important role in monitoring and promoting children's safety and wellbeing and helping children to raise any concerns. To support family engagement, ISA is committed to providing families with accessible information about ISA's child safe policies and practices and involving them in our approach to child safety and wellbeing. Information is provided through.

- Publishing our child safety and wellbeing policies and procedures on ISA's website.
- We will create opportunities for families to have input into the development and review of our child safety policies and practices and encourage them to raise any concerns and ideas for improvement.
- We do this by.
- Encouraging feedback via direct conversations or email correspondence with Staff.
- Parent surveys

### **Diversity and equity**

ISA values diversity and does not tolerate any discriminatory practices. To achieve this, we.

- support the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students and their families.
- support the cultural safety, participation, and empowerment of students from culturally and linguistically diverse backgrounds and their families
- support students with disability and their families and act to promote their participation
- support students and families of diverse sexuality and act to promote their participation
- seek to recruit a workforce that reflects a diversity of cultures, abilities and identities

- ensure that all Staff, Contactors and Volunteers have training about Aboriginal and Torres Strait Islander cultures, disability, culturally and/or linguistically diverse backgrounds, and those with particular experiences or needs
- have a physical environment that actively celebrates diverse cultures and recognises cultural difference
- commit to ensuring that ISA promote the inclusion of students of all abilities.

### **Suitable staff and volunteers**

ISA take all reasonable steps to select and engage suitable skilled people to work with our students. We apply robust child safe recruitment, induction, training, and supervision practices to ensure that all Staff, contractors and volunteers are suitable to work with children.

### **Staff Recruitment**

When recruiting Staff, we develop recruitment advertising and position descriptions for workers who engage with child-connected work that have a clear statement that sets out:

- The job's requirements, duties and responsibilities regarding child safety and wellbeing.
- The job occupant's essential or relevant qualifications, experience and attributes in relation to child safety and wellbeing. All applicants for jobs that involve child-connected work must be informed about the child safety practices of ISA (including the Child Safety and Wellbeing Policy and the Code of Conduct).

### **Staff Induction**

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

- The Child Safety and Wellbeing Policy (this document).
- The Code of Conduct.
- The Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures.
- Any other child safety and wellbeing information that ISA considers appropriate to the nature of the role.

### **Ongoing supervision and management of Staff – Training and information about child safety**

All Staff engaged in child-connected work will be supervised appropriately to ensure that their behaviour towards children is safe and appropriate. Staff will be monitored and assessed to ensure their continuing suitability for child connected work. This will be done by monitoring of interactions with students, regular reviews and ISA professional development sessions, at least one annually. Inappropriate behaviour towards children and young people will be managed swiftly and in accordance with our

ISA policies and our legal obligations. Child safety and wellbeing will be paramount.

### **Complaints and reporting process**

ISA fosters a culture that encourages Staff, volunteers, students and parents to raise concerns and complaints about child safety and wellbeing. This makes it more difficult for breaches of the Code of Conduct, misconduct or abuse to occur and remain hidden. We have clear pathways for raising complaints and concerns and responding which is documented in our Complaints & Grievance Handling Policy.

ISA's response will include:

- externally reporting all matters that meet the required relevant thresholds to Child Protection (Mandatory Reports), the Police (Mandatory Reporting of Child Sexual Abuse), the CCYP (Reportable Conduct), and/or the Victorian Institute of Teaching (Teacher Misconduct), depending on the issues raised and consistent with PROTECT Four Critical Actions and Four Critical Actions: Student Sexual Offending
- fully cooperating with any resulting investigation by an external agency
- protecting any student connected to the child safety incident or concern until it is resolved and providing ongoing support to those affected
- taking particular measures in response to child safety incidents or concerns about an Aboriginal or Torres Strait Islander student, a student from a culturally and linguistically diverse background, a student with disability, and other vulnerable students (such as students who are unable to live at home or students who identify as lesbian gay, bisexual, transgender or intersex)
- sharing information with, or requesting information from, external people or agencies as permitted or required under the Child Information Sharing Scheme and/or the Family Violence Information Sharing Scheme
- securing and retaining records of the child safety incident or concern and ISA's response to it
- taking broader actions to improve child safety (including systemic reviews and resulting improvements).

### **Privacy and information sharing**

ISA collects, uses and discloses information about students and their families in accordance with Victorian privacy laws and other relevant laws, including laws that permit ISA to disclose information about child safety and wellbeing to external people and agencies. For information about how ISA collects, uses and discloses this information, refer to our Privacy Policy on our website.

### **Records Management**

We acknowledge that good records management practices are a critical element of child safety and wellbeing and manage our records accordingly

## Review of Child Safety Practices

At ISA we have established processes for the review and ongoing improvement of our child safe policies, procedures and practices. We will:

- Review and improve our policy every two years or after any significant child safety incident;
- Analyse any complaints, concerns and safety incidents to improve policy and practice; and
- Act with transparency and share pertinent learnings and review outcomes with ISA Staff and our School partners where appropriate.

### Child Safe STANDARD 1

Culturally safe environment in which the diverse and unique identifies and experiences of Aboriginal children and young people are respected and valued

ISA undertakes to recognise and promote the unique experiences of first nations persons. Through promoting understanding of aboriginal culture acknowledging the close ties to connectedness and kinship of family structures. ISA strive to establish strong relationships and community links, we are committed to establishing an inclusive and culturally safe environment where the strengths of Aboriginal and Torres Strait Islander culture, values and practices are respected. ISA does not tolerate any forms of racism or discrimination.

### Child Safe STANDARD 2

Child safety and wellbeing is embedded in organizational leadership, governance and culture.

ISA undertakes to recognise and promote the Child Safe Standards as an intrinsic component of its mission to provide a safe environment. This will be evident in references to the standards in ISA's internal documentation, training and recruitment and a public commitment to child safety.

As managers of day-to-day operations, the management team shall be responsible for the communication, implementation and monitoring of the policy with respect to all key stakeholders including, but not limited to:

- Staff: including all permanent, casual, part-time, full-time, occasional, supervisory, volunteer and relief personnel.
- Parents, Families, and Friends: All families and friends associated with students involving ISA services including all parents, co-parents, step-parents, grandparents, relatives and friends.
- Students: All students under ISA care.
- External Providers: All persons and any business that provides a service or program for students under ISA's care.

Furthermore, ISA recognises the key responsibilities held (with respect to the day to day implementation and monitoring of and compliance with this policy) by staff at ISA.

### Child Safe STANDARD 3

Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously

ISA is a child safe and child-centred organisation, we work to create an inclusive and supportive environment that encourages students and families to contribute to our approach to child safety and wellbeing. We ensure that our environments are friendly and welcoming to all children and young people. We actively seek to include students in decisions that affect them. This includes decisions about delivery of services, management of accommodation facilities, and learning environments. We ensure that students know about their rights to safety, information and participation. We actively seek to understand what makes students feel safe and regularly communicate with students about what they can do if they feel unsafe. We recognise the importance of friendships and encourage respectful relationships, strong friendships and support from peers.

ISA strive to ensure children feel safe and comfortable in reporting concerns and allegations. Key components to this are:

- Ongoing and thorough Professional Learning for all staff to ensure they are aware of the reporting process, their obligations and the law.
- A thorough induction program regarding Child Safety for all new staff.
- An ongoing program on the Child Safe standards.
- All children under ISA care. This will include all aspects of Child Safety as addressed in this policy, taught at an age and developmentally appropriate level. ISA will ensure that all Child Safe education is mindful of children from diverse cultural and language backgrounds.

Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously

ISA a child safe and child-centred organisation, and we work to create an inclusive and supportive environment that encourages students and families to contribute to our approach to child safety and wellbeing. We ensure that our physical, virtual and online environments are friendly and welcoming to all children and young people. We actively seek to include students in decisions that affect them. This includes decisions about delivery of services and management of facilities, and accommodation environments. We ensure that students know about their rights to safety, information and participation. We actively seek to understand what makes students feel safe regularly communicate with students about what they can do if they feel unsafe. We recognise the importance of friendships and encourage respectful relationships, strong friendships and support from peers.

- Publication of ISA Child Safe Policies in age appropriate format on our website
- Ensuring students are briefed on arrival in Australia about their rights and safety
- Encouraging students to communicate openly with ISA Advocates
- Encouraging students to communicate openly with peers and school staff

### Child Safe STANDARD 4

Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously

ISA is a child safe and child-centred organisation, we work to create an inclusive and supportive environment that encourages students and families to contribute to our approach to child safety and wellbeing. We ensure that our environments are friendly and welcoming to all children and young people. We actively seek to include students in decisions that affect them. This includes decisions about delivery of services, management of accommodation facilities, and learning environments. We ensure that students know about their rights to safety, information and participation. We actively seek to understand what makes students feel safe and regularly communicate with students about what they can do if they feel unsafe. We recognise the importance of friendships and encourage respectful relationships, strong friendships and support from peers.

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- A thorough induction program regarding Child Safety for all new staff.
- An ongoing program on the Child Safe standards.
- All children under ISA care. This will include all aspects of Child Safety as addressed in this policy, taught at an age and developmentally appropriate level. ISA will ensure that all Child Safe education is mindful of children from diverse cultural and language backgrounds.

#### Families and communities are informed, and involved in promoting child safety and wellbeing

ISA recognises parents and carers have the primary responsibility for the upbringing and development of their children. We ensure that they participate in decisions affecting their children. We ensure that families and relevant communities (Aboriginal and Torres Strait Islander communities, culturally and linguistically diverse communities) know about ISA's operations and policies, including its Child Safe Policy and the Child Safe Codes of Conduct, record keeping practices, risk management, and complaints and investigation processes. We actively seek to include families and relevant communities in decisions about delivery of services, ISA strive to build cultural safety within the organisation through partnerships with relevant communities.

#### Child Safe STANDARD 5

##### Equity is upheld and diverse needs respected in policy and practice

ISA values diversity and does not tolerate any discriminatory practices. To achieve this, we:

- support the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students and their families
- support the cultural safety, participation and empowerment of students from culturally and linguistically diverse backgrounds and their families
- support students with disability and their families and act to promote their participation
- support students and families of diverse sexuality and act to promote their participation
- seek to recruit a workforce that reflects a diversity of cultures, abilities and identities and linguistically diverse backgrounds
- commit to ensuring that our facilities promote the inclusion of students of all abilities.

#### Child Safe STANDARD 6

People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice

ISA takes all reasonable steps to ensure that it engages the most suitable and appropriate people to work with children. ISA has a team based hands-on approach to recruitment to ensure that all adults are thoroughly screened. The Management Team shares the responsibility and accountability for the recruitment of all staff and volunteers at ISA, practices include:

- ensuring that all Staff and relevant Volunteers and Contractors undergo child protection induction, and ongoing education and training
- requiring all Staff and relevant Volunteers and Contractors to maintain a valid WWC (working with children) clearance, and sighting, verifying and recording this information
- ensuring that professional development programs for Staff include child protection education and training programs.

### Child Safe STANDARD 7

#### Processes for complaints and concerns are child - focused

ISA fosters a culture that encourages everyone to raise concerns and complaints about child safety and wellbeing. Our processes for raising complaints and concerns, and the procedures that all Staff, Volunteers and Contractors must follow whenever they witness, suspect or receive a complaint about

a child safety incident or concern involving a student, a staff member, a Volunteer, a Contractor are set out in the Procedures, below. ISA will take appropriate, prompt action in response to all child safety incidents or concerns, including all complaints, allegations or disclosures of abuse or other harm, when Staff, Volunteers, Contractors, students, parents/carers or anyone else reports these to ISA. ISA's response will include:

- externally reporting all matters that meet the required relevant thresholds to Child Protection (Mandatory Reports), the Police (Mandatory Reporting of Child Sexual Abuse), the CCYP (Reportable Conduct), and/or the Victorian Institute of Teaching (Teacher Misconduct), depending on the issues raised and consistent with PROTECT Four Critical Actions and Four Critical Actions: Student Sexual Offending
- fully cooperating with any resulting investigation by an external agency
- protecting any student connected to the child safety incident or concern until it is resolved and providing ongoing support to those affected
- taking particular measures in response to child safety incidents or concerns about an Aboriginal or Torres Strait Islander student, a student from a culturally and linguistically diverse background, a student with disability, and other vulnerable students (such as students who are unable to live at home or students who identify as lesbian gay, bisexual, transgender or intersex)
- sharing information with, or requesting information from, external people or agencies as permitted or required under the Child Information Sharing Scheme and/or the Family Violence Information Sharing Scheme
- securing and retaining records of the child safety incident or concern and ISA's response to it
- taking broader actions to improve child safety (including systemic reviews and resulting improvements).
- Ensuring all students and families are given information to ISA's complaints and grievance policy – published on ISA's website

#### Child Safe STANDARD 8

Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training

ISA conduct training with all staff on Child Safety and Mandatory Reporting. All ISA staff and contractors are required to complete on an annual basis Department of Education and Training online training module – Protecting Children – Mandatory Reporting and other obligations. Certificate of completion are recorded in ISA’s internal records. Biannual training of all staff and contractors includes topics:

- The role of child protection
- The role of child first
- Victorian child protection legislation
- Offences relating to child sexual abuse
- Grooming offence
- Failure to protect
- Failure to disclose
- Understanding the nature and signs of abuse.
- Physical abuse
- Sexual offences/abuse
  
- Serious emotional or psychological abuse
- Serious neglect
- Reasonable grounds
- Failure to report

#### Child Safe STANDARD 9

Physical and online environments promote safety and wellbeing while minimizing the opportunity for children and young people to be harmed

ISA engage in regular risk assessments to ensure any risks are identified, reduced and or mitigated to provide an opportunity for children to develop safely in physical and online environments. Staff and contractor code of conducts assist in reducing risks.

The purpose of ISA’s risk management strategy is to ensure the well-being of children and young people under ISA’s care and protect them from harm. In the context of creating safe environments for children, risk management means identifying, assessing and taking steps to minimize the risks of harm to children, due to the action or inaction of another person involved with ISA (such as an employee, contractor, volunteer, or another child).

#### Child Safe STANDARD 10

Implementation of the Child Safe Standards is regularly reviewed and improved

ISA have established processes for the review and ongoing improvement of our child safe policies, procedures and practices. We will:

- Review and improve our policy annually or after any significant child safety incident;
- Actively seeks, actions and incorporates feedback from students, families, staff, contractors and school partners

- Analyse any complaints, concerns and safety incidents to improve policy and practice; and
- Act with transparency and share pertinent learnings and review outcomes with Staff, Contractors and School community partners where appropriate.

#### Child Safe STANDARD 11

Policies and procedures document how the organization is safe for children and young people

ISA has adopted all 11 Child Safe Standards and all staff, contractors and volunteers are briefed and inducted on the policies and procedures

ISA's Code of conduct reflects responsible behaviors and expectations

ISA's Grievance and Complaints policy is publicly available and promoted to all students

ISA's staff and contractors must complete on a annual basis DET Online Training Module – Protecting Children, Mandatory Reporting and Other Obligations