



Student **Safety** Handbook

Version: 2026

The Knox School



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Student Safety and Wellbeing Policy

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1 Statement of Context and Purpose

The Knox School (the **School**) is committed to protecting its students from all aspects of harm, and has established strategies, practices, policies and procedures to uphold this public commitment.

Any reference to '**students**' in this policy (or the School's student safety framework more generally) refers to all students enrolled at the School, irrespective of whether they are a domestic or international student.

The School takes a zero-tolerance approach to any behaviours that jeopardise student safety and wellbeing (including child abuse and reportable conduct). The School regards its student safety responsibilities with the utmost importance and strives to deliver an educational curriculum that promotes the School's ethos, vision and values of *Achievement, Responsibility, Respect, Resilience and Care and Empathy*.

The School's aim is to create a space where students can learn in a calm and focused environment characterised by ethical behaviour and defined professional boundaries, and where they feel safe and supported by the School.

The School recognises that any person in authority within, or in relation to the School has a statutory duty under section 49O of the *Crimes Act 1958* (Vic) to protect students from any substantial risk that they will become the victim of a sexual offence committed by another person who is 18 years of age or more and associated with the School.

In addition, the School has a pastoral, moral and legal responsibility to create an inextricable connection between student safety and learning, especially in a personalised learning environment where the School discovers what motivates and inspires its students and focuses on their strengths and ambitions.

This connection will be the foundation of all decisions made, and actions taken by the School when delivering a quality education to its students. At all times, the ongoing safety of its students will be

at the forefront of mind, and the School's paramount consideration.

The School treats seriously its reporting obligations in relation to student safety matters, including to SSR, Child Protection and Victoria Police. The School recognises that whilst reporting obligations may differ depending on a person's position within the School, all staff are required to uphold the ethos of this policy by ensuring that student safety and wellbeing matters are reported internally, and externally where required.

As such, this policy sets out how the School will meet its responsibilities and commitment to student safety and wellbeing, and is a child safety policy made in accordance with *Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and Boarding Premises*.

2 Application

This policy applies to all Board members, the Principal, employees, volunteers, contractors, labour hire workers, secondees and other authorised personnel required to perform functions on the School's premises, or at school-organised activities and events. Collectively, these individuals are referred to as 'staff.'

This policy extends to any other person who is engaged in student-connected work at the School, or that otherwise has direct and regular contact with the School's students (whether supervised or not).

3 Related Documents

3.1 Legislation

- *Crimes Act 1958*(Vic)
- *Worker Screening Act 2020*(Vic)
- *Education and Training Reform Act 2006*(Vic)
- *Child Wellbeing and Safety Act 2005*(Vic)
- *Children, Youth and Families Act 2005*(Vic)
- Ministerial Order No. 1359

3.2 Policies

- Student Safety and Wellbeing Policy - ELC
- Student Safety and Wellbeing – Staff Code of Conduct
- Student Safety and Wellbeing – Raising and Responding to Concerns Policy
- Student Safety and Wellbeing – Recruitment and Employment Policy
- Student Safety and Wellbeing – Record Retention Policy

3.3 Schedules to This Policy:

- Schedule 1: Student Safety and Wellbeing Definitions
- Schedule 2: Student Safety and Wellbeing Responsibilities

3.4 Fact Sheets

- [Grooming offence | Department of Justice and Community Safety Victoria](#)
- [Failure to disclose offence | Department of Justice and Community Safety Victoria](#)
- [Failure to protect: a new criminal offence to protect children from sexual abuse | Department of Justice and Community Safety Victoria](#)

4 Overarching Values and Principles

The School's approach to student safety and wellbeing is guided by a number of overarching principles and values (which are set out below) that guide the development and regular review of strategies, practices, policies and procedures to uphold our commitment to protect students from all forms of harm:

- All students at the School have a right to be safe and to feel safe.
- The safety and wellbeing of students is the School's paramount consideration.
- The safety and wellbeing of students is dependent upon the existence of a student safe culture.
- Student safety and wellbeing is everyone's responsibility.
- Student safety and wellbeing awareness is embodied, promoted and openly discussed within our school community.
- Families can participate in decisions affecting their child and they, and the school community, are engaged and informed about the School's approach to student safety and wellbeing.
- Staff have regard to a student's diverse circumstances, needs, and vulnerabilities so that they can provide support and respond to those who are vulnerable and to ensure equity is upheld in policy and practice.

5 Statement of Commitment to Student Safety and Wellbeing

Set out below, is the School's publicly available statement of commitment to student safety and wellbeing:

The Knox School is a safe and inclusive environment.

We welcome you to The Knox School. In visiting, you join us as a member of our community and thus join us in our commitment to child safety. At The Knox School, we are committed to acting in the best interests of students' safety. At our School, there is no place for child abuse in any forms.

In your time at the School, we ask that you:

- *Treat all students with dignity and courtesy.*
- *Respect the School's commitment to cultural and social inclusion.*
- *Report concerns about child safety to a member of staff who can then facilitate your meeting with one of the School's Student Safety Officers.*
- *Respect the privacy of students and their families and only disclose information to people who have a need to know.*

And that you do not:

- *Engage in inappropriate personal communications with a student through any medium.*
- *Take or publish (including online) photos, movies or recordings of a student without parental / guardian consent granted through the School.*
- *Engage in any form of inappropriate behaviour towards students or expose students to such behaviour.*

We hope your time with us is both enjoyable and worthwhile.

6 A Student Safety and Wellbeing Culture

Creating and maintaining a student safety and wellbeing culture requires input from the entire school community. Our aim is to provide a safe environment that aligns with the School's mission and values of *Achievement, Responsibility, Respect, Resilience and Care and Empathy*.

To achieve this, we promote a model of personalised learning where students are recognised as an individual. As such, we deliver three interconnected learning journeys. The first develops our students academically. The second focuses on creativity, critical thinking, collaboration and communication to apply this knowledge. The third focuses on building strength of character to live a life underpinned by strong values and a desire to give back.

Through our processes and practices, we also ensure that a student safety and wellbeing culture is championed and modelled at all levels of the School, from the top down to the bottom up. Accordingly, student safety and wellbeing are embedded in our school leadership, governance and culture. We do this by setting clear expectations regarding student safety and wellbeing to our school community (including staff and students), and ensuring that at all times, our governance arrangements facilitate the implementation of this policy (including by making student safety and wellbeing a standing agenda item and reviewing the School's student safety and wellbeing processes across all levels).

7 Support and Engagement of All Students

The School appreciates that a student safety and wellbeing environment looks different for every student, and in delivering this, supports and respects the cultural safety of Aboriginal and Torres Strait Islander students and their families, international students, students from culturally and/or linguistically diverse backgrounds, as well as students with a disability or who are otherwise vulnerable (including students who identify as LGBTQI+ and those with challenging home situations).

The School also appreciates that a student safe environment is contingent on a culturally safe environment, which requires proactive and ongoing efforts to maintain.

Our primary focus in delivering personalised education and through decision-making, is that all students are safe, feel safe, and are able to create and develop a range of strategies and skills, which can be used flexibly to flourish in all aspects of their lives. As such, we support and encourage students to talk openly and share their views, particularly about matters that directly impact them.

The School will aim to ensure students (and their parents) are provided with the necessary skills and

knowledge to understand and maintain a student's own personal safety and wellbeing, including:

- (a) Understanding, identifying, discussing and reporting student safety and wellbeing matters.
- (b) Standards of behaviour for students attending the School.
- (c) Healthy and respectful relationships (including those relating to gender and sexuality).
- (d) Resilience.

The School will aim to ensure that staff are provided with the necessary skills and knowledge to understand and maintain a student and culturally safe environment, including through:

- (a) Actively supporting and encouraging Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds and their families to:
 - Express their culture and enjoy their cultural rights.
 - Facilitate participation and inclusion in all aspects of school life.
 - Engage in discussion to identify what can be done to support these students.
- (b) Implementing and embedding strategies within the school community that acknowledge and appreciate the strengths of Aboriginal culture and understand its importance to the safety and wellbeing of Aboriginal children and students.
- (c) Cultural training to improve understanding and respect (particularly with regard to Aboriginal and Torres Strait Islander culture), appreciation of culturally sensitive issues, including using appropriate language when referring to individuals or communities, and to equip staff to build culturally safe environments for children and young people.
- (d) Identifying, confronting and addressing incidences of racism seriously (noting it will not be tolerated), with the appropriate consequences and where appropriate with the involvement of Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds, and their families.
- (e) Ensuring that the School's strategies, practices, policies and procedures create a culturally safe and inclusive environment which values and respects the diverse and unique identities and experiences of Aboriginal and Torres Strait Islander children, young people and students, (including their families), as well as others from culturally and linguistically diverse backgrounds.
- (f) Providing particular attention to the needs of students with a disability (or otherwise, additional needs), students from culturally and linguistically diverse backgrounds, international students, students who identify as LGBTQI+ (or who are otherwise gender diverse) and those students who are unable to live at home.
- (g) Providing particular attention to the needs of Aboriginal and Torres Strait

Islander students to promote and provide a culturally safe environment for them.

The School will promote its student safety and wellbeing practices to students in ways that are readily accessible, easy to understand and user-friendly, including by:

- (a) The appointment of Student Safety Officers and a senior Student Safety Officer who champion student safety and wellbeing (see below).
- (b) Training staff to recognise the indicators of harm to students, including harm caused by not only adults but also other children and young people, and harm in an online environment.
- (c) Collaborating with parents to ensure that they are provided with the information necessary to maintain consistent messaging about child abuse and reportable conduct.
- (d) Encouraging students to identify safe and unsafe environments and situations (including in an online environment).
- (e) Setting clear student safety and wellbeing standards so that staff, students and the school community are aware of the standards that are expected, and those which fall short of the School's expectations.
- (f) Distributing child-friendly publications, including student safety and wellbeing posters (e.g., PROTECT poster).
- (g) Clearly communicating where students can access support, make a report about safety or wellbeing concerns, or otherwise obtain information.
 - Ensuring that students have identified safety and wellbeing, and support, networks to overcome any barriers that may prevent disclosure of safety or wellbeing concerns.
 - Ensuring staff are trained and supported to effectively implement this policy.
- (h) Translating or making available in simple English, relevant policies and documents for international students (or otherwise, students from culturally and linguistically diverse backgrounds) and their families, so that they are able to access information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.
- (i) Designating the International Program Coordinator as a first point of contact for all international students and their parents, to serve as the conduit for communication between the School and its international community in ways that are culturally safe, accessible and easy to understand. This includes the International Program Coordinator:
 - Communicating key information to the international community via School official WeChat posts.
 - Facilitating individual written communications, phone calls and face-to-face meetings in simplified English or another language.

- Translating information (including policies, procedures and all information relating to a child's education at the School) _on the School's behalf or otherwise arranging for an official translator to do.
- Ensuring that the School's procedures for responding to complaints or concerns relating to child abuse are accessible to international students, their parents and those in the community from culturally diverse backgrounds.
- Attending meetings related to an international student to ensure the family feels supported during the process.
- Explaining the School's rules, expectations, policies and procedures to international students and their family – both prior to the student's commencement, during the student's orientation session and during the enrolment.
- Ensuring that international students, and their families have access to the School's International Prospectus (which amongst other things, contains translated versions of the School's Grievances Policy).

8 Raising and Responding to Student Safety and Wellbeing Concerns

The School takes all allegations or disclosures of suspected child abuse and reportable conduct seriously, and responds to such allegations and disclosures promptly and thoroughly.

All instances of suspected child abuse or reportable conduct, allegations of child abuse or reportable conduct, or student safety and wellbeing concerns and complaints must be reported to the Principal, a member of the Executive Team, or a Student Safety Officer, and will be treated very seriously and consistently according to the School's and individual staff member's internal and external reporting procedures and obligations.

The School has a *Student Safety and Wellbeing – Raising and Responding to Concerns Policy*, available on the School's website, which sets out:

- How concerns about actual and suspected child abuse and reportable conduct may be raised with the School.
- Who such concerns can be raised with at first instance (including the Principal, the Executive Team and the School's Student Safety Officers).
- How such concerns will be dealt with by the School (including by complying with any legislative reporting obligations, and the School's expectations of staff regarding information sharing and record keeping).
- How the School will support or assist students (and their families) who disclose such concerns, or who are otherwise linked to such concerns.

The School will ensure that the procedures contained in the *Student Safety and Wellbeing – Raising and Responding to Concerns Policy* is student-focused, and can be easily understood by the school community, in particular students.

If School staff believe a student is at immediate risk of child abuse, they must phone 000. Other concerns may be raised by members of the school community in accordance with the *Grievance Policy*.

9 Reporting a Sexual Offence: Failure to Protect Offence

Failure by a person in authority to protect a child under the age of 16 from criminal sexual abuse is also an offence under section 49O of the Crimes Act.

This applies where there is substantial risk that a child under the care, supervision or authority of an organisation (including a student of a school) will become a victim of a sexual offence by an adult associated with the School.

The person in a position of authority may be guilty of an offence if they know of the risk of abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so.

The offence requires an associated person to reduce or remove a 'substantial' risk. It is not a criminal offence to fail to address every possible risk that a sexual offence may be committed against a child. However, there are a number of factors to assist associated persons in identifying risks which amount to 'substantial' risks. These include:

- The likelihood or probability that the child will become the victim of a sexual offence.
- The nature of the relationships between a child and the adult who may pose a risk to the child.
- The background of the adult who may pose a risk to the child, including any past or alleged misconduct.
- Any vulnerabilities particular to a child, which may increase the likelihood that they may become the victim of a sexual offence.

Any other relevant fact which may indicate a substantial risk of a sexual offence being committed against a child.

10 Student Safety and Wellbeing Employment Practices

We believe that the safety and wellbeing of students is dependent on the existence of a student safe culture. Establishing that culture requires effective staff recruitment, supervision and management practices.

All positions (including but not limited to staff, volunteer and Board positions) at the School that involve student-connected work will have a position description, which clearly sets out:

- The position's requirements, duties and responsibilities regarding student safety and wellbeing.
- The applicant's essential or relevant qualifications, experience and attributes in relation to education and student safety and wellbeing.
- The School's values and commitment in respect of student safety and wellbeing.
- How the School will support those who make disclosures.

Student safety and wellbeing is a paramount consideration during the recruitment process. All staff working with children and young people must be suitable and reflect the School's values and commitment to student safety and wellbeing in practice.

The School assesses the suitability of staff to undertake student-connected work through screening

(including identity checks), qualification verifications, values-based interviews, work history checks and referee checks.

All prospective staff will be informed about the School's student safety and wellbeing practices (including but not limited to this policy, the *Student Safety Staff Code of Conduct*, the School's and individual staff member's record keeping, information sharing and reporting obligations), and be subject to student safety and wellbeing screening in accordance with the School's obligations under legislation (including *Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises*).

A successful applicant cannot commence at the School until written clearance in respect of student safety and wellbeing screening is obtained. A current VIT registration, Police Check or WWCC (or equivalent) must be sighted and verified by the School, and appropriately recorded before staff can engage in student-connected work.

Appropriate and mandatory induction regarding the School's student safety and wellbeing practices (including policies and procedures) will follow any successful appointment or engagement with the School. This induction will ensure staff, board members volunteers (including homestay providers) and education providers are aware of their responsibilities to children and students, information sharing, and reporting obligations in line with this policy.

The induction process for incoming Board members must also address the requirement for the School's governing body to:

- Ensure that the School's recruitment, engagement, supervision and ongoing employment practices reflect the School's commitment to student safety and wellbeing values in practice.
- Ensure that recruitment advertisements for staff have a clear statement that sets out:
 - the jobs requirements, duties and responsibilities regarding student safety and wellbeing; and
 - the job occupant's essential or relevant qualifications, experience and attributes in relation to the student safety and wellbeing.

Otherwise comply with its obligations relating to suitable staff and volunteers under clause 10 of *Ministerial Order No.1359*.

The School requires that staff act professionally, and in a way that embodies the School's public commitment to student safety and wellbeing throughout their time at the School. The School has a *Student Safety Staff Code of Conduct*, available on the School's website, which provides guidelines for staff on expected behavioural standards and responsibilities and sets out examples of appropriate and inappropriate behaviours. The School will take appropriate disciplinary action where a staff member is found to have acted contrary to that Code, or the School's other policies and procedures regarding appropriate standards of behaviour.

At least annually, the School will ensure that appropriate guidance and training is provided to relevant staff (including the Board) engaged in student-connected work about:

- Individual and collective obligations and responsibilities for identifying and managing the risk of child abuse and reportable conduct.

- Child abuse and reportable conduct risks in the school environment (including the online environment).
- The School's current student safety and wellbeing standards and practices.
- The Risk and Compliance Manager is responsible for taking reasonable steps to ensure all staff complete the School's mandatory student safety and wellbeing training modules and briefings.

The School will ensure that privacy and employment law obligations are met when responding to student concerns and complaints.

Staff will otherwise be subject to regular supervision, training and periodic student safety and wellbeing checks, including to ensure their ongoing suitability for student-connected work.

11 Student Safety Officers

The School has appointed Student Safety Officers (**SSOs**) as a first point of contact to provide advice and support to students, parents, and staff regarding the safety and wellbeing of students at the School.

The following Student Safety Officers may be contacted to provide advice and support:

Name	Position	Contact Details
Ms Nikki Kirkup	Principal	Nikki.Kirkup@knox.vic.edu.au
Ms Toni-Ann Bright	Head of Community, Culture and Operations	Toni-Ann.Bright@knox.vic.edu.au
Mr Simon Cowell	Head of Junior School	Simon.Cowell@knox.vic.edu.au
Ms Janelle Mathias	Head of Senior School	Janelle.Mathias@@knox.vic.edu.au
Mr Nathan Bower	Head of Sport, Strategy and Programs	Nathan.Bower@knox.vic.edu.au
Student Safety Officers can also be contacted via Reception on (03) 8805 3800 .		

Student Safety Officers will receive appropriate training and support in relation to student safety, prevention of child abuse and reportable conduct, and responding to allegations of child abuse and reportable conduct.

Student Safety Officers are able to act as a source of support, advice and expertise to staff on matters of student safety and wellbeing and liaise with the Principal and the Executive Team to maintain the visibility of student safety and wellbeing.

Staff are encouraged to speak with one of the Student Safety Officers should they hold any concerns relating to student safety and wellbeing.

Staff, students and parents can contact the Student Safety Officer for further information regarding student safety and wellbeing and for any questions or concerns or reports of suspected or alleged child abuse or reportable conduct.

12 Risk Management

The School will develop and implement risk management strategies regarding student safety and wellbeing, both online and in the physical school environment without compromising a student's right to privacy, access to information, social connections and learning opportunities.

These strategies will identify, control, remove and otherwise focus on preventing and reducing, the risk(s) of child abuse, reportable conduct and otherwise, risks to student safety and wellbeing by taking into account the nature of the environment, the activities expected to be conducted in that environment (including the provision of services by contractors or outside organisations), and the characteristics and needs of all students expected to be present in that environment.

In addition, these strategies will place a positive responsibility on ensuring that student safety and wellbeing is actively promoted at school.

Where the School identifies risks of actual or suspected child abuse or reportable conduct occurring in the online or physical school environment, it will make a written record of those risks and determine the action(s) it will take to remove or otherwise reduce the risks (risk controls and risk treatments).

The School will monitor, review and evaluate the effectiveness of the implementation of its risk controls and risk treatments annually, and update these where required.

The School will ensure it creates, maintains and disposes of any records about student safety and wellbeing in line with the Public Record Office Victoria Recordkeeping Standards, including minimum retention periods regarding these obligations. In addition, the School will detail its information sharing and record-keeping processes and ensure all staff (including volunteers) understand their relevant obligations.

13 Student Participation and Empowerment

The School recognises that a student safe culture is also contingent upon the participation and empowerment of students themselves.

Consistent with this understanding, the School will ensure:

- That students are informed about all their rights, including to safety, information and participation (for example, those in the United Nations Convention on the Rights of the Child).
- That the importance of friendships is recognised and support from peers is encouraged to help students feel safe and be less isolated.
- Where relevant, that students are offered access to child abuse (including sexual abuse) and reportable conduct prevention programs and other relevant information in an age-appropriate way. This includes access to a school counsellor for all students, and as part of this service, students can obtain referrals to access external sexual abuse prevention programs and other related information in a sensitive and age-

appropriate way.

- The School will also consider whether external organisations, such as Bodyworks or Elephant Education could assist the School in furthering student access to these services. This process will be child friendly and students will be encouraged to express their views, participate in decision making and raise their concerns.
- Staff are attuned to the signs of harm (including that caused by child abuse and reportable conduct) and facilitate child-friendly ways for students to express their views, participate in decision making and raise their concerns.
- The School has strategies and curriculum planning documents in place to develop a culture that facilitates participation and is responsive to the input of students.
- The School provides opportunities for students to participate and are responsive to their contributions, thereby strengthening confidence and engagement.

14 Reflection and Continuous Improvement

The School is committed to continual improvement that is responsive to emerging thinking, evidence and practice, so as to eliminate (where practicable) the possibility of student safety risks occurring in the first place. Where the School can improve, it will strive to do so. The School will report on the outcomes of any relevant review to the school community.

15 Student Safety and Wellbeing Responsibilities

Society as a whole shares responsibility for promoting the safety and protection of students from child abuse and reportable conduct. In the School context, all members of the school community have a role to play.

However, specific responsibilities in respect of student safety and wellbeing are assigned to:

- The Board.
- The Principal.
- The Executive Team.
- Student Safety Officers.
- Staff.
- Students and parents/guardians.

For further information, please refer to **Schedule 2: Student Safety and Wellbeing Responsibilities**.

16 Breach of this Policy

The School emphasises the need for staff to fully comply with the requirements of this policy.

Staff found to be in breach of the requirements of this policy may be subject to disciplinary action, up to and including termination of employment or engagement (as the case may be). Breaches may also result in notifications to appropriate authorities and/or the Police.

17 Communication and Implementation

17.1 Communication

This policy is made publicly available on the School's website.

This policy is available to staff as part of the School's and the Board's internal policies and procedures. Aspects of (and updates to) the School's student safety and wellbeing framework, including this policy will be addressed in the School's professional development updates, training programs, bulletins and newsletters.

17.2 At Board / Principal Level

To properly implement this policy:

- (a) The Board and Principal will review this policy and the School's student safety and wellbeing practices at least every two years (or more frequently after a significant student safety and wellbeing incident) and implement improvements where applicable.
- (b) Families and the school community will be afforded the opportunity to contribute to the review and development of the School's student safety and wellbeing policies and practises (including this policy).
- (c) Periodic training and refresher sessions on this policy are provided to all staff.
- (d) The Principal is responsible for monitoring staff compliance with this policy. All staff must ensure that they abide by this policy and assist the School implementing this policy.



Schedule 1: Student Safety and Wellbeing Definitions

1 Introduction

This Schedule sets out the key definitions used in the School's *Student Safety and Wellbeing Policy*.

2 Definitions

Behaviour that causes **emotional or psychological harm to a child** includes sexual offences, sexual misconduct, physical violence and significant neglect. However, other types of behaviours can also cause emotional or psychological harm including, for example, severe or sustained instances of verbal abuse; coercive or manipulative behaviour; hostility towards, or rejection of, a child; and humiliation, belittling or scapegoating.

Child means a child under the age of 18 years, except in the case of certain mandatory reporting obligations which may define a child to be under a different age.

Child abuse means all forms of child abuse defined in the ETR Act and includes:

- Any act committed against a child involving a sexual offence or grooming.
- The infliction on a child, of physical violence or serious emotional or psychological harm.
- Serious neglect of a child.

CWS Act means the *Child Wellbeing and Safety Act 2005*(Vic), as amended from time to time.

CYF Act means the *Children, Youth and Families Act 2005*(Vic), as amended from time to time.

DFFH means the Department of Families, Fairness and Housing, which is the department responsible for Child Protection.

ETR Act means the *Education and Training Reform Act 2006*(Vic), as amended from time to time.

Executive Team refers to the Principal, Associate Principals, including Heads of sub-school, and the Chief Financial Officer.

Grooming is defined in the *Crimes Act 1958*(Vic) and refers to communication, by words or conduct, between an adult and a child with the intention of facilitating the commission of a sexual offence involving the child. Grooming may be identified by attempts being made at establishing an intimate relationship with, befriending or influencing a child (or, in some circumstances, members of the child's family). In this respect, grooming involves psychological manipulation that is usually very subtle, drawn out, calculated, controlling and premeditated (Victorian Parliamentary Inquiry 2013).

Mandatory reporter has the meaning given to it by section 182 of the CYF Act. It includes but is not limited to registered teachers (including early childhood teachers), staff with post-secondary

qualifications employed in the care, education or minding of children, school principals, registered nurses, students in training to become teachers (who have been granted permission to teach under relevant legislation), registered psychologists, out of home care workers, early childhood workers and any other person referred to in section 182 of the CYF Act.

Neglect refers to an individual's failure to meet their obligations and responsibilities to keep a child safe and well, and can include:

- Supervisory neglect, which is the absence or inattention of a staff member which places the child at risk of physical harm or injury, sexual abuse or allows other criminal behaviour to occur.
- Physical neglect, which is the failure to provide basic physical necessities for a child, such as adequate food, clothing, housing or medical attention.

Parent includes a guardian or carer, and 'parents' has a corresponding meaning.

Physical violence includes an act that causes physical injury or pain. Examples of physical violence can include:

- Hitting, kicking and punching.
- Pushing, shoving, grabbing, throwing and shaking.
- Using an object to hit or strike.
- Using inappropriate restraint/excessive force.

Physical violence does not include lawful behaviour. For example:

- Reasonable steps taken to protect a child from immediate harm, such as taking their arm to stop them from going into oncoming traffic.
- Medical treatment given in good faith by an appropriately qualified staff member, such as a senior first aid officer administering first aid.

Threats of physical violence that do not cause physical injury or pain may still amount to behaviour that causes emotional or psychological harm.

Reasonable belief means a belief that would lead a reasonable person in the same position as you, and with the same information as you to form a belief that child abuse (including sexual abuse) or reportable conduct is occurring or may occur. There must be some objective basis for the belief. However, it is not necessary to have proof to form a reasonable belief, nor do you need to make a judgement about the truth of an allegation. However, a reasonable belief is more than suspicion, mere rumour or speculation.

For example, a 'reasonable belief' about a sexual offence might be formed when:

- A student states that they have been sexually abused.
- A student states that they know someone who has been sexually abused (because sometimes the student may be talking about themselves).
- Someone who knows a student states that the student has been sexually abused.
- Professional observations of the student's behaviour or development leads a

professional to form a belief that the student has been sexually abused.

- Signs of sexual abuse lead to a belief that the student has been sexually abused.

It is permissible to ask a person raising a concern with you, sufficient questions to establish a reasonable belief. However, care should be taken not to ask the person any suggestive or leading questions.

Staff who are not sure whether they have a reasonable belief must consult with a SSO or a member of the Executive Team.

Reportable allegation means any information that leads a person to form a reasonable belief that an employee has committed reportable conduct, or misconduct that may involve reportable conduct, whether or not the conduct or misconduct that is alleged to have occurred was within the course of the person's employment or engagement with the School.

In the above definition, 'employee' has the meaning given in the CWS Act.

Reportable conduct means:

- A sexual offence committed against, with or in the presence of, a child.
- Sexual misconduct, committed against, with or in the presence, of a child.
- Physical violence committed against, with or in the presence of, a child.
- Any behaviour that causes significant emotional or psychological harm to a child.
- Significant neglect of a child.

In the above definition, 'child' has the meaning given in the CWS Act.

School means The Knox School

School community means all those who are directly and indirectly involved with the School, including students, parents, carers and alumni, as well as businesses, charitable organisations and locals that are affiliated with the School.

Sexual misconduct includes behaviour, physical contact or speech or other communication of a sexual nature (including inappropriate touching, grooming behaviour and voyeurism).

Other examples of sexual misconduct include:

- Developing an intimate relationship with a student, for example, through regular contact with the student without the knowledge or approval of the School;
- Inappropriately discussing sex and sexuality with a student; or
- Other overtly sexual acts that could lead to the School taking disciplinary or other action.

Sexual offence means a sexual offence set out in clause 1 of Schedule 1 to the *Sentencing Act 1991* (Vic), and includes sexual assault (including rape and attempted rape), indecent acts, possession of child abuse material, exposure to pornography, and grooming.

Any sexual activity between a child and an adult can be a sexual offence. In certain circumstances, sexual activity between children can also be a sexual offence, and also between two adults (particularly when one is a student).

Significant, in relation to harm or neglect, means that the harm is more than trivial or insignificant, but need not be as high as serious and need not have a lasting permanent effect.

SOCIT means the Victoria Police Sexual Offences and Child Abuse Investigation Team.

SSO means a Student Safety Officer.

SSR means Social Services Regulator.

Staff and **staff members** include Board members, the Principal, employees, volunteers, contractors, labour hire workers, secondees and other authorised personnel required to perform functions on the School's premises, or at school-organised activities and events.

Student means a child under 18 years of age, and any student at the School over 18 years of age, and **'students'** has a corresponding meaning.

Student-connected work means work authorised by the School and performed by an adult in a school environment while children or young people are present or reasonably expected to be present.

Victimisation means treating a person unfairly or unreasonably because they, or someone associated with them, has made, or intends to raise a concern about student safety or student wellbeing, or who is otherwise involved or participates in the School's, or an external body's investigation of the concern.

VIT means the Victorian Institute of Teaching.

VRQA means the Victorian Registration & Qualifications Authority.

WSA Act means *Worker Screening Act 2020*(Vic), as amended from time to time.

WWCC means Working with Children Check.



Schedule 2: Student Safety and Wellbeing Responsibilities

1 Introduction

This Schedule is part of the School's student safety and wellbeing framework, and sets out how the School allocates responsibility for meeting its public commitment to student safety and wellbeing.

2 Responsibilities

2.1 The Board

The Board is the governing body for the legal entity which operates the School, and as such is ultimately responsible for ensuring that student safety and wellbeing (and in particular the care, safety and welfare of children and young people) is the School's paramount consideration.

Without limiting that responsibility, the Board:

- Acquires guidance and information on student safety and wellbeing matters, and keeps up-to-date with its student safety and wellbeing obligations through engaging in professional development.
- Satisfies itself that the School has strategies (reflected through policies, procedures, words and actions) to embed a culture of student safety and wellbeing in the governance, operations and culture of the School, which comply with the Board's obligations under Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and Boarding Premises.
- Delegates roles and responsibilities to the Principal, for achieving the School's student safety and wellbeing strategies.
- Satisfies itself that the Principal has allocated appropriate roles and responsibilities to the Executive Team, and to staff, for achieving the School's student safety and wellbeing strategies.
- Satisfies itself that the school community is engaged and informed about the School's student safety and wellbeing strategies, and allocation of roles and responsibilities.
- Ensures that the School, and in particular the Principal, has adequate resources and support to achieve the School's student safety and wellbeing strategies.
- Must be satisfied the School has recruitment, engagement, supervision and ongoing monitoring practices which reflect student safety and wellbeing values in practice, and ensure that all School staff and volunteers are suitable to work with children.
- Keeps the Principal and, via the Principal, keeps all staff accountable for achieving the School's student safety and wellbeing strategies, sharing relevant information and ensuring adequate recordkeeping in accordance with the Public Record Office Victoria Recordkeeping Standards.
- Must complete induction upon or shortly after commencement, which covers the School's student safety framework, student safety obligations and each of the

requirements in Ministerial Order No. 1359 (including those detailed in clause 10).

- Must complete annual student safety training which addresses each of the requirements in clause 12 of Ministerial Order No. 1359.
- Periodically reviews the effectiveness of the School's student safety and wellbeing strategies in practice (including by, if considered appropriate, revising those strategies).
- Ensures that the School's student safety and wellbeing policies enable staff and volunteers to identify and mitigate risks in the School's environment without compromising a student's right to privacy, access to information, social connections and learning opportunities.
- Ensures that student safety and wellbeing remains a regular Board agenda item for review, reflection and discussion as well as ensuring that the School reports on the outcomes of any relevant review to the school community.
- Ensures that privacy and employment law obligations are met when responding to student concerns and complaints.

2.2 The Principal

In accordance with good governance, the Board delegates responsibility for the day-to-day operation of the School – and in particular the care, safety, wellbeing and welfare of students – to the Principal.

The Principal is therefore responsible at a day-to-day level, and accountable to the Board, for taking all practical measures to ensure that:

- The School has a student safety and cultural safety culture (including in the online environment), and that this is promoted within the school environment – such as at assemblies and on posters in visible locations.
- The School's student safety and wellbeing strategies are achieved, both in policy and in practice.
- The School's student safety and wellbeing policies are communicated to parents, students and families, and that input is sought from them regarding policy development and review, and that the processes contained within are understood and culturally safe.
- Staff are enabled, prepared and supported when managing student safety and wellbeing complaints, including in their support of the student(s) involved (and, where appropriate, their families).
- Staff are educated, and complying with, their professional and statutory responsibilities regarding student safety and wellbeing.
- Staff are enabled, prepared and supported in identifying the risks to student safety and wellbeing, noting that indicators of harm may vary depending on the differences and needs of the student.
- Staff are enabled, prepared and supported to create, maintain and dispose of records about student safety and wellbeing in line with the Public Record Office Victoria Recordkeeping Standards.

- Staff champion and model compliance with safety and wellbeing policies and procedures.
- Concerns about student safety and wellbeing are dealt with seriously, promptly and thoroughly, and in accordance with the School's policies and procedures, and any statutory obligations and that the School co-operate with law enforcement agencies and relevant authorities as required.
- The Board receives timely reports regarding student safety and wellbeing concerns and risks, or any developments regarding the School's student safety and wellbeing obligations.

2.3 The Executive Team

The Executive Team is committed to 'leading from the front' and engaging in a preventative, proactive and participatory approach to student safety and wellbeing issues.

Where appropriate, the Executive Team will assist the Principal with discharging the student safety and wellbeing responsibilities outlined in this document, and as otherwise required by legislation and good practice.

2.4 Student Safety Officers

Key responsibilities for the School's SSOs include:

- Having a good working knowledge and appreciation of the School's student safety and wellbeing framework.
- Without replacing any legal reporting obligations any person may have, supporting the Principal in promptly managing the School's response to an allegation of actual or suspected child abuse or reportable conduct, and ensuring that the allegation is taken seriously and responded to appropriately and thoroughly.
- Ensuring the School's student safety and wellbeing strategies are clearly and regularly communicated to staff, students and other members of the school community.
- Ensuring the School's student safety and wellbeing strategies are being implemented effectively and are strengthened where required.
- Ensuring a strong and sustainable student safety and wellbeing culture is embedded within the School.

2.5 Staff

All staff are required to comply with the School's student safety and wellbeing framework (including in particular this policy, *Student Safety and Wellbeing Policy*), as well as their legal and professional obligations with respect to the prevention and reporting of actual or suspected child abuse and reportable conduct.

It is each such staff member's individual responsibility to be aware of key risk indicators of child abuse or reportable conduct, to be observant, and to raise any concerns they may have with one of the Principal, the Executive Team, the School's SSOs (and/or with external agencies, where required). In this regard, staff are encouraged to voice their concerns, no matter how minor, trivial or insignificant.

All contractors, labour hire workers, secondees and volunteers involved in student-connected work are required to adhere to this policy and the *Student Safety Staff Code of Conduct* and are responsible for contributing to the safety and wellbeing of students in the school environment. They too have obligations with respect to the reporting of actual or suspected child abuse or reportable conduct.

Again, it is the School's expectation that contractors, labour hire workers, secondees and volunteers are attuned to their individual responsibilities and act in accordance with their internal and external reporting obligations, and the School's policies and procedures.



Student Safety and Wellbeing Policy – ELC

Last Review: 7 th July 2026	Constructed by: RK Lawyers
	Reviewed by: Finance & Risk Manager
Next Review: 7 th June 2028 (and every two years thereafter in accordance with the School's review cycle, or more frequently as required)	Approval Required: Executive
	Board Sign Off Date: N/A

1 Statement of Context and Purpose

The Knox School (the **School**) is committed to protecting its students from all aspects of harm, and has established strategies, policies, practices and procedures to uphold this public commitment.

All strategies, policies, practices and procedures flow from the School's vision to:

- Maintain a safe, inclusive environment that proactively protects and champions the health, safety, and wellbeing of every child.
- Cultivate a culturally safe environment where the identity, heritage, and rights of Aboriginal and Torres Strait Islander children, and children from all cultural backgrounds, are respected and safeguarded.
- Empower children by actively listening to their voices, valuing their input, and embedding their perspectives into the design of safe centre environments.
- Take immediate, decisive action to intervene and protect any child identified as being at risk of harm, maltreatment, abuse, or neglect.
- Equip and mandate all staff to fulfill their legal obligations, including mandatory reporting and duty of care requirements, regarding any suspected child abuse or neglect.
- Utilize regulatory information-sharing schemes to proactively request and share information, ensuring collaborative risk management for child safety and family violence.

The School takes a zero-tolerance approach to any behaviours that jeopardise student safety and wellbeing (including child abuse and reportable conduct). The School regards its student safety and wellbeing responsibilities with the utmost importance as it delivers an independent, co-educational, non-denominational educational program curriculum that promotes the School's values of Achievement, Responsibility, Respect, Resilience, Care and Empathy.

In addition, the School has a pastoral, moral and legal responsibility to create an inextricable connection between student safety and learning, especially in a personalised learning environment

where the School discovers what motivates and inspires its students and focuses on their strengths and ambitions.

Further information about the School's commitment to student safety and wellbeing is set out in the *Student Safety and Wellbeing Policy*.

2 Context

The School's Early Learning Centre (**ELC**) delivers education and care for 3-year-old and 4-year-old kindergarten students.

The School recognises that ELC students have unique needs and vulnerabilities. The School also acknowledges the specific legal and regulatory requirements which apply to the operation of an ELC environment in relation to child safety and wellbeing; including mandatory reporting obligations to the Australian Children's Education and Care Quality Authority (**ACECQA**).

This policy sets out strategies, policies, practices and procedures specifically relevant to the ELC, and should be read in conjunction with the School's broader Student Safety and Wellbeing framework (which also applies to the ELC).

As such, this policy sets out how the School will meet its responsibilities and commitment to the safety and wellbeing of children in the ELC's care, and is a child safe environment and wellbeing policy made in accordance with the National Quality Framework (comprising of the *Education and Care Services National Law* and the *Education and Care Services National Regulations*).

3 Application

This policy applies to all Board members, the Principal, employees, volunteers, contractors, labour hire workers, secondees and other authorised personnel required to perform functions on the School's premises (including the ELC), or at School-organised activities and events. Collectively, these individuals are referred to as 'staff'.

This policy extends to any other person who is engaged in child-connected work at the ELC, or who otherwise has direct and regular contact with the School's students and children under the care of the School's ELC (whether supervised or not).

4 Related Documents

4.1 Legislation

- *Education and Care Service National Law Act 2010* (Vic)
- *Children's Services Act 1996* (Vic)
- *Child Safety and Wellbeing Act 2005* (Vic)
- *Worker Screening Act 2020* (Vic)
- *Crimes Act 1958* (Vic)

- *Education and Training Reform Act 2006*(Vic)
- *Children, Youth and Families Act 2005*(Vic)
- Ministerial Order No. 1359

4.2 Policies

- Student Safety and Wellbeing Policy
- Student Safety and Wellbeing – Staff Code of Conduct
- Student Safety and Wellbeing – Raising and Responding to Concerns Policy
- Student Safety and Wellbeing – Recruitment and Employment Policy
- Student Safety and Wellbeing – Record Retention Policy

4.3 Schedules to this Policy

- Schedule 1: ELC reporting obligations
- Schedule 2: ELC conduct responsibilities

4.4 Fact sheets

- [Notification types and timeframes | ACECQA](#)
- [Reporting requirements about children | ACECQA](#)
- [Safe use of devices in education and care services | ACECQA](#)

5 ELC-Specific Strategies, Policies, Practices and Procedures

The School will educate ELC staff about individual and collective duties and responsibilities, including under the National Law.

The School will ensure the ELC learning environment provides appropriate child groupings, legislated ratios, supervision, sufficient space, lighting, ventilation, and carefully chosen and well-maintained resources and equipment.

The School is committed to the safe use of digital technologies and online environments in an ELC environment, including in relation to:

- the taking, use, storage and destruction of images and videos of children being educated and cared for by the ELC;
- obtaining authorisation from parents to take, use and store images and videos of children being educated and cared for by the ELC;
- the use of any optical surveillance device at the ELC (including CCTV);
- the use of any digital device issued by the service;
- the use of digital devices by children being educated and cared for by the ELC.

In addition to the School's expected behavioural standards and responsibilities for staff set out in the Student Safety and Wellbeing - Staff Code of Conduct (which applies to ELC staff), there are a number of additional expectations that apply for staff members working in connection with the School's ELC

environment. These are set out in **Schedule 2**, and reflect the School's rigor in ensuring the ongoing suitability of staff to undertake student-connected work.

Where there is a valid professional context for images and videos to be taken in connection with the operation of the ELC, School-issued devices will be used and remain on the School's premises at all times.

The ELC environment must already be free from the use of tobacco, illicit drugs and alcohol, they will also need to be free from the use of vaping substances and vaping devices.

6 Raising and Responding to Student Safety and Wellbeing Concerns

The School treats all allegations or disclosures of suspected child abuse and reportable conduct with the utmost seriousness, and responds to such allegations and disclosures promptly and thoroughly.

All instances of suspected child abuse or reportable conduct, allegations of child abuse or reportable conduct, or student safety and wellbeing concerns and complaints must be reported to the Principal, a member of the School Executive Team, or a Student Safety Officer, and will be treated very seriously and consistently according to the School's and individual staff member's internal and external reporting procedures and obligations.

The School has a *Student Safety and Wellbeing – Raising and Responding to Concerns Policy*, available on the School's website, which sets out:

- How concerns about actual and suspected child abuse and reportable conduct may be raised with the School.
- Who such concerns can be raised with at first instance (including the Principal, the School Executive Team and the School's Student Safety Officers).
- How such concerns will be dealt with by the School (including by complying with any legislative reporting obligations, and the School's expectations of staff regarding information sharing and record keeping).
- How the School will support or assist students (and their families) who disclose such concerns, or who are otherwise linked to such concerns.

Additional mandatory reporting obligations apply specifically within the context of the School's ELC environment, which are summarised in **Schedule 1**. These apply in addition to those set out in the *Student Safety and Wellbeing – Raising and Responding to Concerns Policy*.

If School staff believe a student is at immediate risk of child abuse, they must phone 000.

Other concerns may be raised by members of the School community in accordance with the *Formal Complaints Policy and Formal Complaints Policy (ELC)*.

7 Student Safety Officers

The School has appointed Student Safety Officers as a first point of contact to provide advice and support to students, parents, and staff regarding the safety and wellbeing of students at the School.

In addition to the Student Safety Officers set out in the *Student Safety and Wellbeing Policy*, the following ELC-specific Student Safety Officers may be contacted to provide advice and support:

Name	Position	Contact Details
Ms Tina Cimino	ELC Coordinator	Tina.Cimino@knox.vic.edu.au
Mr Simon Cowell	Head of Junior School	Simon.Cowell@knox.vic.edu.au
Student Safety Officers can also be contacted via Reception on (03) 8805 3800 .		

Student Safety Officers are able to act as a source of support, advice and expertise to staff on matters of student safety and wellbeing and liaise with the Principal and the School Executive Team to maintain the visibility of student safety and wellbeing.

Staff are encouraged to speak with one of the Student Safety Officers should they hold any concerns relating to student safety and wellbeing.

Staff, students and parents can contact the Student Safety Officer for further information regarding student safety and wellbeing, or for any questions or concerns or reports of suspected or alleged child abuse or reportable conduct.

8 Risk Management

In line with the *Student Safety and Wellbeing Policy*, the School will develop and implement risk management strategies which are relevant to the School generally; as well as strategies which are unique to the context of an ELC environment.

9 Breach of this Policy

The School emphasises the need for staff to fully comply with the requirements of this policy.

Staff found to be in breach of the requirements of this policy may be subject to disciplinary action, up to and including termination of employment or engagement (as the case may be). Breaches may also result in notifications to appropriate authorities and/or the Police.

10 Communication and Implementation

10.1 Communication

This policy is made publicly available on the School's website.

This policy is available to staff as part of the School's and the Board's internal policies and procedures. Aspects of (and updates to) the School's student safety and wellbeing framework, including this policy, will be addressed in the School's professional development updates, training programs, bulletins and newsletters.

10.2 At Board / Principal Level

To properly implement this policy:

The Board and Principal will review this policy and the School's student safety and wellbeing practices at least every two years (or more frequently after a significant student safety and wellbeing incident) and implement improvements where applicable.

Families and the School community will be afforded the opportunity to contribute to the review and development of the School's student safety and wellbeing policies and practises (including this policy).

Periodic training and refresher sessions on this policy are provided to all staff.

The Principal is responsible for monitoring staff compliance with this policy. All staff must ensure that they abide by this policy and assist the School implementing this policy.

10.3 At Other Levels

To properly implement this policy, all staff must ensure that they will abide by this policy and assist the School in the implementation of this policy.



Schedule 1: ELC Reporting Obligations

1 Introduction

Schedule 1 sets out the out the main additional mandatory reporting obligations that apply to the School's ELC and related staff.

Staff will receive training on their personal reporting obligations to achieve this.

While this Schedule is specific to ELC reporting obligations, it should be read in conjunction with the School's *Student Safety and Wellbeing – Raising and Responding to Concerns Policy*, which sets out more broadly the School's internal and external reporting procedures and obligations (which continue to apply for the ELC and its staff).

2 Notifiable Incidents to ACECQA

As an approved provider, the School's ELC is required to notify the Australian Children's Education and Care Quality Authority (**ACECQA**) of any:

- serious incidents.
- complaints.
- circumstances at the ELC which pose a risk to the health, safety or wellbeing of children.
- any incident or allegation that physical or sexual abuse of a child or children has occurred or is occurring while the child or children are being educated and cared for by the ELC.

Notifiable incidents are set out in the below table.

National Law	Notification	Timeframe
Serious incidents		
Section 174(2)(a) Regulation 12(a)	Death of a child.	As soon as practicable, but within 24 hours.
Section 174(2)(a) Regulation 12(c)	Any incident involving serious illness of a child while being educated and cared for which the child attended or ought reasonably to have attended a hospital. Examples include severe asthma attack, seizure or anaphylaxis.	Within 24 hours of the incident or of becoming aware of the incident.

National Law	Notification	Timeframe
Section 174(2)(a) Regulation 12(b)	Any incident involving serious injury or trauma to a child while being educated and cared for which the child attended or ought reasonably to have attended a hospital, or a reasonable person would consider that the child would require urgent attention from a registered medical practitioner. An example includes a broken limb.	Within 24 hours of the incident.
Section 174(2)(a) Regulation 12(d)	Any emergency for which emergency services attended. This means an incident, situation or event where there is an imminent or severe risk to the health, safety or wellbeing of a person at the ELC. A notification may not be required where emergency services attended as a precaution.	Within 24 hours of the incident.
Section 174(2)(a) Regulation 12(e)(i) Regulation 12(e)(ii)	A child appears to be missing or cannot be accounted for or appears to have been removed from the premises in a manner that contravenes the National Regulations.	Within 24 hours of the incident.
Section 174(2)(a) Regulation 12(e)(iii)	A child is mistakenly locked in or out of the premises or any part of the premises.	Within 24 hours of the incident.
Complaints		
Section 174(2)(b) Regulation 12	Any complaint alleging that: a serious incident has occurred or is occurring at the ELC (refer to Serious Incidents outlined in table above), or the National Law has been contravened.	Within 24 hours of the complaint.
Physical and sexual abuse of a child		
Section 174(2)(c) Regulation 175(2)(d) Regulation 176(2)(bb)	Any <u>incident</u> where the ELC reasonably believes that physical or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the ELC.	Within 24 hours of the incident or within 24 hours of the ELC becoming aware of the incident.

National Law	Notification	Timeframe
Section 174(2)(c) Regulation 175(2)(e) Regulation 176(2)(bc)	<u>Allegations</u> that physical or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the ELC.	Within 24 hours of the allegation or within 24 hours of the ELC becoming aware of the allegation.
<i>Any circumstances that pose a risk to the health, safety or wellbeing of a child</i>		
Section 174(2)(c) Regulation 175(2)(c) Regulation 176(2)(c)	Any circumstance at the ELC that poses a risk to the health, safety or wellbeing of a child attending the ELC.	Within 7 days of becoming aware of the relevant information.

Failure to notify ACECQA of the notifiable incidents can constitute an offence.

Staff may notify ACECQA of serious incidents online through the NQA IT System. The incident, injury, trauma and illness record template can be used to record any supporting evidence or other (non-serious) incidents.

If staff are unsure whether an incident, complaint or circumstance should be notified to ACECQA or another body, staff must seek advice from the Principal, a member of the School Executive Team, a Student Safety Officer or the appropriate body to which a report must be made.

All ACECQA notifications must also be reported to the Principal.

Schedule 2: ELC Conduct Responsibilities

1 Introduction

Schedule 2 sets out the out the main additional conduct responsibilities that apply to the School's ELC staff, made in accordance with the National Law.

This Schedule should be read in conjunction with the School's *Student Safety and Wellbeing - Staff Code of Conduct*.

2 Child Safety and Protection

The School takes a zero-tolerance approach to any behaviours that jeopardise student safety and wellbeing (including child abuse and reportable conduct). Accordingly, the *Student Safety and Wellbeing – Staff Code of Conduct* establishes a clear list of acceptable and unacceptable behaviours, with the ultimate aim of protecting children and young people from harm.

In addition to the expectations set out in the *Student Safety and Wellbeing – Staff Code of Conduct*, staff working in connection with the ELC must adhere to the following Do's:

DO

- Place personal electronic devices (such as tablets, phones, digital cameras and smart watches) in staff issued lockers upon arrival at the ELC.
- Advise and obtain prior written approval and consent by their manager or an appropriate staff member within the School Executive Team if images or videos of children are required to be taken, recorded, stored and retained.
- Only taking images or videos of children with a service-issued electronic device, if prior written approval and consent is obtained.
- Ensure Head of Junior School level staff are able to access images and videos of children within the ELC, which are securely stored digitally and in hardcopy files and monitored by the ELC.
- Ensure the use and possession of a personal electronic device for purposes other than taking images or recording videos of children is only for used for communication in an emergency situation, personal health requirements, disability, family necessity, technology failure or local emergency events.
- Obtain written authorisation from parents to take, use and store images and videos of children being educated and cared for by the ELC.

In addition to the expectations set out in the *Student Safety and Wellbeing – Staff Code of Conduct*, staff working in connection with the ELC must adhere to the following Do Not's:

DO NOT

- Use or possess personal electronic devices that can take images or videos (such as tablets, phones, digital cameras and smart watches) and personal storage and file transfer media (such as SD cards, USB drives, hard drives and cloud storage) at the ELC, when engaging in child-related work or on their person when with children.
- Use personal electronic devices when communicating with families and carers.
- Use a personal electronic device to photograph children or record audio or visual images of children for any purpose, including to document children's learning.
- Access images and videos within the ELC that are not approved or monitored by the ELC.
- Inappropriately post images, videos and content of children online or shared through other applications, without written prior approval from the ELC.
- Take inappropriate images or videos of children that are not directly relevant to the child's participation in the activities of the ELC. For example, taking inappropriate and potentially illegal images or videos include where a child is not appropriately dressed, in their underwear, in a state of undress, completely undressed or with their genitalia exposed, in a position that could be perceived as sexualised in nature, in distress or anxious, experiencing or demonstrating distress or dysregulation.
- Transfer an image or video of a child to their own account or device either directly or via the cloud, for example, to post images or videos on social media or other applications and software platforms that were not its intended purpose.
- Use of tobacco, illicit drugs, alcohol, vaping devices and vaping substances.
- Be affected by alcohol or drugs (including prescription medication) so as to impair their capacity to supervise or provide education and care to children in the ELC.



Student Safety and Wellbeing - Staff Code of Conduct

Last Review: 24 th June 2025	Constructed / Reviewed by: The Knox School, on advice from Russell Kennedy Lawyers and with input from the School Community.
Next Review: 24 th June 2027 (and every two years thereafter in accordance with the School's review cycle, or more frequently as required)	Approval Required: Board
Document Date: 24 th June 2025	Board Sign Off Date: 24 th June 2025

1 Introduction

At The Knox School (**the School**), our expectations for the way staff conduct themselves are underpinned by:

- the School's values: achievement, responsibility, respect, resilience, care and empathy;
- the School's core purpose, which is to provide an education which enables each of its students to achieve their personal best;
- the School's paramount consideration, which is the care, safety and welfare of its students; and
- respect for the School and members of the school community.

The School encourages staff to adopt positive behaviours, and recognises there will be times when staff make mistakes and poor decisions. At the same time however, the School must enforce certain standards to ensure its success, and the care, safety and welfare of the school community. Consequences, including disciplinary action, form part of the School's response when staff fall short of the School's standards.

This code (including the Schedules attached to this code) ensures that staff understand:

- The general standards of conduct and performance (referred to in this code as 'behaviour') that are expected from all staff at the School.
- Examples of staff behaviour that falls short of the School's standards.
- The School's specific expectations with respect to the themes addressed in Schedule 1 regarding student safety and wellbeing, and in Schedule 2 regarding professional boundaries between staff and students.
- The obligations on staff to take responsibility for their own behaviour, both at and outside school, and to work with the School and colleagues cooperatively to achieve a productive, respectful and safe school environment and workplace.

- How the School responds to concerns about staff behaviour.

This code is not an exhaustive list of the standards that apply to staff in every aspect of a staff member's behaviour. Indeed, the School has many policies, procedures and rules which set out the School's expectations regarding staff behaviour (which continue to apply). Instead, this code sets out general expectations of the standards of behaviour required.

To the extent of any inconsistency between this code and any of the School's other policies, procedures and rules, the expectations and processes set out in this code shall prevail. In this respect, this code should be regarded as an overarching summary of the School's expectations and processes regarding staff behaviour. Nothing in this code should be taken to limit the circumstances in respect of which the School may take disciplinary action in respect of a staff member.

All staff must familiarise themselves with and comply with this code.

The processes outlined in this code are intended to be practical, non-adversarial and non-legal.

Whilst this code does not form part of a staff member's contract or terms of employment, staff are nonetheless required to comply with this code as it contains lawful and reasonable directions (with consequences of failing to do so set out in section 8 of this code).

The School reserves the right to vary, replace or withdraw this code at any time.

2 Application

In this code:

- **'Staff'** and **'colleagues'** means employees (whether employed on a permanent, temporary or casual basis), university and work experience students on placement, contractors, labour hire workers, secondees and volunteers employed or engaged by the School.
- **'School community'** includes the School's Board, the Principal, staff, students, parents and alumni.

This code applies to:

- All Board members, the Principal, employees, volunteers, contractors, labour hire workers, secondees and other authorised personnel required to perform functions on the School's premises, or at school-organised activities and events.
- Any other person who is engaged in student-connected work at the School, or that otherwise has direct and regular contact with the School's students (whether supervised or not).

The code applies at all times, to all staff for the duration of their employment or engagement. The application of this code is not limited to the School's grounds and operating hours. Indeed, this code also extends to situations when staff are:

- On School grounds.
- At any School-related activities and events (including speech nights, parent-student-teacher interviews, camps, and similar activities or events held by or in connection with the School).

- Representing the School, including when off-campus or in a digital environment.
- Travelling to and from the School, as well as to and from off-site activities or events.
- Wearing School logos or uniform (including staff name badges).
- Upholding the School's or a Teacher's legal duty of care owed to students.
- Otherwise engaging in behaviour which in the reasonable opinion of the School may adversely affect student safety and wellbeing, student relationships, staff health and safety, staff-student relationships, perceptions regarding a staff member's professionalism, a staff member's relationships with other members of the school community, or the reputation of the School.

In some cases, this code will apply to staff interactions with former students.

This Code is in addition to profession specific codes of conduct, such as the Victorian Institute of Teaching's (**VIT**) Standards of Professional Practice and Code of Conduct for teachers that outline behaviours expected by all teachers in Victoria. School staff must also comply with other codes of conduct, policies and procedures at the School that apply to them, including the *Student Safety and Wellbeing Policy*.

3 Related Documents

3.1 Legislation

- *Worker Screening Act 2020 (Vic)*
- *Education and Training Reform Act 2006 (Vic)*
- *Child Wellbeing and Safety Act 2005 (Vic)*
- *Children, Youth and Families Act 2005 (Vic)*
- Ministerial Order 1359
- Victorian Teaching Profession Code of Conduct

3.2 Policies

- Student Safety and Wellbeing Policy
- Student Safety and Wellbeing Policy – ELC
- Student Safety and Wellbeing – Raising and Responding to Concerns Policy
- Student Safety and Wellbeing – Recruitment and Employment Policy
- Student Safety and Wellbeing – Record Retention Policy

3.3 Schedules to this Policy:

- Schedule 1: Student Safety and Wellbeing
- Schedule 2: Professional Boundaries

4 The School's Commitment to Promoting Positive Behaviours

The School is focused on helping staff develop behaviours which contribute positively to the success of the School. Accordingly, **Table 1** sets out behaviours that all staff at the School are expected to 'Do':

DO	
• Conduct themselves at all times, both personally and professionally in a manner that upholds the ethos, reputation and values of the School • Carry out their duties in a professional, competent and conscientious manner • Seek opportunities to improve their knowledge and skills, including by participating in relevant professional development, school-related learning activities and staff meetings • Act honestly and in good faith in fulfilling their duties and responsibilities • Ensure that their interactions with others reflect the School's values • Model appropriate behaviour for the School's students • Be collaborative, courteous, respectful and prompt in dealing with other people in the school community (and when otherwise representing the School, whether formally or informally) • Respect the School's property, and the property of other members of the school community • Comply with any other expectations outlined in the Schedules	• Comply with all School codes of conduct, policies, procedures and rules • Act ethically and responsibly • Be accountable for their actions and decisions • Be familiar and comply with any legal, industry or professional requirements that apply to a staff member's duties and responsibilities (including under work health and safety laws) • Perform their duties and responsibilities to the best of their ability and be accountable for their performance • Follow reasonable instructions given by their supervisor or delegate • Comply with the School's lawful and reasonable directions and all legislation applicable to their position • Support the delivery of high-quality education to the School's students • Act in accordance with the School's reporting obligations (including as detailed in the School's Student Safety and Wellbeing – Raising and Responding to Concerns Policy), as required under the Child Safe Standards, as well as any obligations which apply to them personally

5 Behaviours That May Fall Short of Our Expectations

As in any school, there are a range of staff behaviours which fall short of the School's standards.

These include behaviours which:

- Are contrary to the DO behaviours set out above.
- Are one of the DO NOT behaviours set out in Table 2 below.
- Are contrary to the School's other codes of conduct, policies, procedures and rules.
- Are contrary to the School's values.
- Are contrary to the expectations set out in a staff member's employment contract or offer of employment.

- Are contrary to any legal, industry or professional standards that may apply to a staff member. This includes, in the case of Teachers, the standards set out in the VIT's Standards of Professional Practice and Code of Conduct.
- Otherwise pose risk to the care, safety and welfare of a member of the school community.

DO NOT	
• Act contrary to the expectations outlined in: ◦ Table 1 – 'DO' behaviours ◦ The Schedules • Engage in disrespectful, rude or insulting behaviour (including but not limited to sarcasm, derogatory remarks, inappropriate familiarity, behaviour that is passive aggressive, threatening or intimidating behaviour, or social exclusion)	• Be abusive, derogatory, threatening, intimidating, discriminatory or use disparaging language • Engage in physical abuse or violence • Intimidate or victimise others • Be aggressive, whether through words, conduct or gestures • Engage in bullying, discrimination, sexual harassment, or vilification (or behaviour that is perceived to constitute any of the above)

Section 8 outlines the School's general response to dealing with staff misconduct. In summary, the response process involves: understanding the concerns, investigating, making findings, and determining consequences.

6 Concerns About the Practicality of This Code

If a staff member is concerned that compliance with a particular aspect of this code is not practical, or otherwise has questions about this code, the staff member should promptly – and before acting contrary to this code – raise the concern with their supervisor or the Principal.

7 Compliance

This code takes into account the interests of all students who are educated at the School, and all School staff. This code is intended to complement other professional or occupational codes of conduct that regulate particular staff at the School (for example, The Victorian Teaching Profession's Code of Conduct by VIT and the Australian Counselling Associations Code of Ethics and Practice).

8 Breach of This Code

"The standard you walk by is the standard you accept."

Staff are encouraged to be upstanders, as it is no longer appropriate to be a bystander to the unacceptable behaviour of others. It is expected that all staff will promptly report any concerns or information about possible breaches of this code (whether by themselves or colleagues) to their supervisor or the Principal.

9 Interim Measures

The School has discretion to implement interim measures it considers appropriate in the circumstances pending the outcome of an investigation (see below) about a staff member's alleged conduct. This may include circumstances where the School forms concerns:

- (a) That a staff member has or may have breached this code (or otherwise, the School's other directions, codes of conduct, policies, procedures, rules or values).
- (b) About the staff member's health and wellbeing.
- (c) About the health and wellbeing of other students or staff.
- (d) Of a nature that the School considers it appropriate to exercise its direction to implement interim measures pending the outcome of any inquiries.

Interim measures may include (but are not limited to) suspending a staff member with or without pay whilst the School conducts an investigation, and/or providing interim directions.

10 Investigation

The School will investigate breaches of this code in accordance with principles of procedural fairness. In the context of this code, procedural fairness primarily means affording a staff member an opportunity to be heard regarding any specific before a decision is made about the outcome.

The School recognises that all individuals can make mistakes. However, where concerns about a possible breach of this code arise, the School expects the staff member concerned to demonstrate a commitment to the School's standards and values by displaying cooperation, accountability, insight and transparency.

After completing enquiries and considering the available information, the School is responsible for determining when conduct of a staff member falls short of the School's standards, and warrants consequences. The final decision regarding such matters rests with the Principal.

Where inconsistent accounts from investigation participants are received, the School will endeavour to resolve these. Nonetheless, it is open for the School to make findings in "*he said/she said/they said scenarios*" on the basis of the information available.

11 Consequences

When a staff member's conduct falls short of the School's expectations, consequences will usually include disciplinary action (which may involve counselling, a warning or termination of employment). Breaches of the code also result in notifications to appropriate authorities and/or the Police.

The nature of the consequences will depend on the nature and seriousness of the conduct, and any other relevant considerations (including whether the conduct is isolated or repeated, the context in which the conduct occurred, and the consequences and risks created by the conduct). Ultimately, any consequences which involve a staff member's ongoing employment require that there remain trust and confidence in a staff member's capacity and willingness to uphold the standards outlined in this code.

The final decision regarding consequences rests with the Principal.

12 Communication and Implementation

12.1 Communication

This code is made publicly available on the School's website.

This code is available to staff as part of the School's and the Board's internal policies and procedures. Aspects of (and updates to) the School's student safety and wellbeing framework, including this code will be addressed in the School's professional development updates, training programs, bulletins and newsletters.

12.2 At Board / Principal Level

To properly implement this code:

- (a) The Board and Principal will review this code and the School's student safety and wellbeing practices at least every two years (or more frequently, including in response to legislative amendments, an incident, changes to the School's internal procedures or practices, or otherwise as requested by the Principal) and implement improvements where applicable.
- (b) Families and the school community will be afforded the opportunity to contribute to the review and development of the School's student safety and wellbeing policies and practises (including this code).
- (c) Periodic training and refresher sessions on this code are provided to all staff.
- (d) The Principal is responsible for monitoring staff compliance with this code. All staff must ensure that they abide by this code and assist the School implementing this code.

12.3 At Other Levels

To properly implement this code, all staff must ensure that they will abide by this code and assist the School in the implementation of this code.



Schedule 1: Student Safety and Wellbeing

1 Introduction

This Schedule is a child safety code of conduct made in accordance with *Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and the School Boarding Premises*.

This Schedule should be read in conjunction with the School's *Student Safety and Wellbeing Policy* and *Student Safety and Wellbeing – Raising and Responding to Concerns Policy*.

2 Commitment to Student Safety

The School is committed to protecting its students from all aspects of harm and has established strategies, practices, policies and procedures to uphold its public commitment to student safety and wellbeing.

The School takes a zero tolerance approach to any behaviours that jeopardise student safety and wellbeing (including child abuse and reportable conduct). Accordingly, this *Student Safety Staff Code of Conduct*:

- Establishes a clear list of acceptable and unacceptable behaviours by members of the school community towards students, with the ultimate aim of protecting such students from harm.
- Offers guidance to staff and informs them of considerations relevant to personal, professional and ethical decision making.
- Serves to protect students, eliminate or otherwise reduce opportunities for child abuse or reportable conduct to occur, and promote student safety and wellbeing in the school environment.
- Provides guidance on how to best support students and how to avoid or better manage difficult situations.

3 Student Protection

Specifically, staff will:

DO

- Behave as a positive role model to students, including through words, conduct and actions.
- Promote the care, safety and welfare of students.
- Provide a learning experience which is consistent with the School's and relevant professional or occupational codes of conduct, which supports students to achieve their personal best, and takes into account individual learning and behavioural needs.
- Act consistently (both in person and in the online environment) with the School's student safety and wellbeing strategies.
- Treat all students and members of the school community with courtesy and respect (including by modelling positive, impartial, professional and respectful behaviour and relationships and acting in a manner that sustains a safe, educational and pastoral environment for students).
- Take all reasonable steps to protect students from harm (examples of which include, but are not limited to bullying, child abuse, discrimination, grooming, sexual harassment, neglect, sexual misconduct, sexual offences, physical violence, reportable conduct and victimisation).
- Be aware of and alert to risk factors related to and indicators of harm in students, and where appropriate, report such risks or indicators to the Principal, a member of the School Executive Team, or a Student Safety Officer and the relevant authorities.
- Provide appropriate supervision for students with regards to age, individual needs and the specific environment.
- Ensure, as far as is reasonably practicable, that staff are not alone with students unless it is necessary to fulfil the staff member's duty of care or professional duties.
- Comply with any directions, guidelines, policies, procedures and rules promoted by the School with respect to student safety and wellbeing.
- Respect personal differences (including differences regarding cultures, disability, ethnicity, gender, religion, race, political matters, gender diversity and sexuality) and encourage others to do the same.
- Promote the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students to ensure equity is upheld and diverse needs are respected (for example, by never questioning their self-identification and by recognising the importance of such student relationships with their extended family and community, including Elders).
- Providing particular attention to the needs of students with a disability (or otherwise, additional needs), students from culturally and linguistically diverse backgrounds, international students, students who identify as LGBTQI+ (or who are otherwise gender diverse) and those students who are unable to live at home.
- Inform and empower all students about their rights, including in relation to safety and wellbeing, information and participation.
- In an online environment, identify and mitigate risks while ensuring students' rights to privacy, access to information, social connections and learning opportunities are upheld.
- Use positive and affirming language toward students.
- Recognise that some students need extra care, and provide those students with support, advocacy or skills for the students to advocate for themselves.
- Encourage students to 'have a say' and participate, then listen to them with respect. In

particular, listen and respond to the views and concerns of students, particularly if they are telling you that they or another student has been abused (or that they are worried about their safety and wellbeing or the safety and wellbeing of another student).

- Encourage and support students who raise safety and wellbeing concerns (including about actual and suspected child abuse or reportable conduct).
- Seek input from families in relation to decisions impacting students, and act to reduce barriers to inclusion taking into account the diverse needs of students and their families.
- Respect cultural, religious and political differences, and encourage others to do the same.
- Help provide an open, safe and supportive environment for all students to interact, and socialise.
- Intervene when students are engaging in inappropriate behaviours towards each other, or towards others.
- Promptly report any breaches of this code.
- Report concerns about student safety and wellbeing (including actual or suspected child abuse or reportable conduct) to the Principal, the School Executive Team, or to one of the School's Student Safety Officers.
- Ensure that your legal obligations to report allegations externally are understood and met.
- Ensure any response to a student's behaviour or circumstance is commensurate with the student's age and vulnerability (and the staff member's responsibility for the care, safety and welfare of the student).
- Be aware of and alert to the risk factors of behaviour in breach of this code or that otherwise pose harm to students, and promptly report such concerns to the School.
- Where an allegation of child abuse or reportable conduct is made, ensure (as far as it is quickly and reasonably possible) that the student(s) involved are safe.
- Call the Police on 000 if you have immediate concerns for a student's safety and wellbeing.
- Respect the privacy of others by not sharing personal information about a student (including any information that could be used to identify a student) unless necessary for their safety and wellbeing or to promote their wellbeing and educational experience. Where it is necessary to share personal information about a student, only do so in an environment where it will be treated confidentially.
- Understand and comply with the School's record-keeping obligations.

However, staff must not:

DO NOT

- Engage in any form of inappropriate behaviour towards students (including by engaging in bullying, child abuse, discrimination, grooming, sexual harassment, victimisation, neglect, sexual misconduct, sexual offences, physical violence, reportable conduct or victimisation) or expose students to such behaviour.
- Create a circumstance that places a student at risk of the behaviour described above (for example, by locking doors).
- Use physical means or corporal punishment to discipline or control a student.
- Engage in any form of behaviour that has the potential to cause a student serious or significant emotional or psychological harm.
- Use prejudicial, oppressive behaviour or inappropriate language with or in the presence of students.
- Promote views on cultures, disability, ethnicity, gender, religion, race, politics, gender diversity or sexuality in the presence of students (unless a valid professional context arises) or discriminate against any student based on such matters.
- Engage in open discussions of a mature or adult nature (such as those that are not professional or age appropriate, or which otherwise involve a staff member's personal views or personal life) in the presence of students without a valid professional context.
- Take, publish or disseminate (including online) photos, movies, videos or recordings of a student without parent consent.
- Use inappropriate language, jokes or gestures in the presence of students.
- Post online any information about a student that may identify them such as their: name, age, email address, telephone number, residence, school, or details of any association, club or group they may be affiliated with.
- Ignore or disregard student safety and wellbeing concerns (including allegations of actual or suspected child abuse of reportable conduct).
- Consume alcohol in the presence of students, unless at an official School function at which alcohol consumption by staff has been approved by the Principal.
- Attend the School, or School-related activities and events, whilst under the influence of alcohol or illicit substances, or whilst affected by prescription medication to the extent that the ability to perform professional duties is impaired.

4 Report Concerns

Members of the school community (other than staff) who are aware of actual or suspect child abuse or reportable conduct, or who otherwise have concerns about a student's welfare, should immediately raise their concern directly with the School in accordance with the *Student Safety and Wellbeing – Raising and Responding to Concerns Policy*.

Whenever there are concerns that a student is in immediate danger, Victoria Police should be contacted on 000.

Staff should report any concerns about potential breaches of this code to the Principal (or the Board if the concern is about the Principal), and are otherwise required to comply with their reporting obligations under law and under any applicable School procedures (including the *Student Safety and*

Wellbeing – Raising and Responding to Concerns Policy).

If no specific reporting procedure is specified for a certain issue, staff must:

- Where an allegation of child abuse is made: ensure as quickly as possible that the student involved is safe.
- If staff have immediate concerns for a student's safety; call the Police on 000.
- Report any actual, alleged or suspected reportable or unlawful conduct, breach of any School code of conduct, direction, policy, procedure, or rule, or any other student safety and wellbeing concern to a Deputy Principal or the Principal.

It is not acceptable, or consistent with the School's values, for staff to not report an issue simply because they were not directly involved (or because they only became aware of an issue outside the course of their employment with the School). Every member of staff has a role to play in ensuring that the School's standards are upheld.

Concerns can otherwise be raised in accordance with the *Grievance Policy*.

5 Mandatory Notifications

Staff must notify the Principal if:

- they are charged with or convicted of any offence or become aware that another staff member has been charged or convicted with any offence;
- they are the subject of an allegation, investigation or concern that may impact upon their eligibility to hold a Working With Children Check (or equivalent) or valid teaching registration;
- they are the subject of a personal safety intervention order (or equivalent) or any other family violence intervention order issued by a court of competent jurisdiction; or
- through their employment with the School, the staff member becomes aware of any crime involving theft, violence or a sexual offence committed by a person.

6 Responsibilities

Student safety and wellbeing is the responsibility of everyone at school. For further information, refer to the Student Safety and Wellbeing Responsibilities set out in Schedule 2 of the *Student Safety and Wellbeing Policy*.



Schedule 2: Professional Boundaries

1 Introduction

This Schedule should be read in conjunction with the School's *Student Safety and Wellbeing Policy* and *Student Safety and Wellbeing – Raising and Responding to Concerns Policy*.

It is not possible for the School to definitively identify all possible circumstances in which a staff member may cross professional boundaries. Accordingly, this Schedule is designed to make certain expectations clear, and otherwise provide guidance and raise awareness about certain issues and situations where professional boundaries may be crossed.

There is no definitive source on where professional boundaries are in relation to interactions between staff and students.

Behaviour will cross professional boundaries because:

- It constitutes an actual abuse of a staff member's position of trust and authority over a student (e.g. child abuse and grooming).
- It involves the creation of a personal or 'special' relationship between a staff member and a student (e.g. giving gifts or providing preferential treatment).

Behaviour may cross professional boundaries because:

- It involves the perception of a personal or 'special' relationship between a staff member and a student (e.g. giving gifts or providing preferential treatment).
- It creates a situation whereby a student is more susceptible to inappropriate behaviour by others (e.g. asking students to keep secrets).
- It was unnecessary as part of a staff member's professional duties.
- It was contrary to the School's codes of conduct, directions, policies, procedures and rules.
- It was contrary to community standards.

In this regard, staff need to understand that behaviour may cross professional boundaries even if there is no romantic or sexual element to it. Indeed, behaviour can cross professional boundaries even with good intentions.

Some conduct (e.g. child abuse and grooming) is obviously unacceptable. In other cases, staff must take personal responsibility (and will be held accountable) for exercising professional judgment to ensure that appropriate boundaries are maintained, and that all interactions have a valid professional context. At all times, staff must err on the side of caution in deciding whether certain behaviour may cross professional boundaries.

This means that staff must:

- exercise good judgment;
- consider carefully the implications and potential consequences and risks of certain actions; and
- prioritise a student's own needs (including education, care, safety and welfare).

There may be limited circumstances where behaviours discouraged in this Schedule may be undertaken for legitimate and laudable reasons. For example, a staff member may wish to provide money to buy groceries for a disadvantaged student. However, a key theme of professional boundaries is ensuring that any behaviour which may raise questions is as transparent as possible (e.g. with Principal approval).

Questions which staff may wish to ask themselves when deciding whether a certain interaction with a student is appropriate, or perhaps warrants a discussion with the School leadership, include:

- Do the School's codes of conduct, directions, policies, procedures and rules have anything to say about my behaviour?
- Am I dealing with a particular student differently from the way I deal with other students under the same circumstances?
- Would I be acting primarily for the student's benefit, or my own?
- Would I engage in the same behaviour if the Head of the School was present?
- Is it possible that my behaviour may be perceived negatively by others?
- Is there another option which better aligns with the School's expectations, and manages risk?
- Should I consult with, or seek approval from, someone else within the School?

2 Be vigilant

2.1 Staff Must Not:

- (a) Encourage or maintain a personal rather than professional relationship with any student.
- (b) Engage in conduct that shows, or that can be interpreted as showing, a personal rather than a professional interest in a student.
- (c) Hold conversations with a student of an intimately personal nature where they disclose information about themselves.
- (d) Engage in sensitive conversations with students. In saying this, staff may, as part of their pastoral care role, sometimes be required to engage in sensitive discussions with students. However, staff must be extremely cautious about making personal comments about a student or asking questions that probe a student's sexuality or relationships.
- (e) Give gifts or other benefits (whether monetary or non-monetary) to students.
- (f) Invite students to their home.

- (g) Visit students at their home.
- (h) Attend parties or socialise with students.
- (i) With the exception of those specifically engaged by the School as tutors or coaches, engage in tutoring or coaching students from the School.

2.2 Staff Can Maintain Professional Boundaries By:

- (a) Promoting the care, safety and welfare of students.
- (b) Not making physical contact with students without a necessary and valid professional context (e.g. to protect a student from imminent harm).
- (c) Ensuring all communications with students have a valid professional context and occur via authorised School channels.
- (d) Not being alone with students unless it is necessary to fulfil a staff member's duty of care or professional duties.
- (e) Not holding conversations with a student of an unnecessarily personal nature (including those relating to sexuality or a student's relationships).
- (f) Not unnecessarily sharing personal information with students.
- (g) Not sharing food with students.
- (h) Not engaging in any behaviour which may pose a risk to the care, safety and welfare of students (including bullying, child abuse, discrimination, emotional or psychological harm, physical violence, sexual harassment and sexual misconduct).
- (ii) Seeking guidance or approval when staff behaviour may be contrary to this code, or otherwise raise concern.

3 Relationships With Students

Staff must not encourage, engage in or maintain a romantic, sexual or overly personal relationship with a student. It is irrelevant whether the relationship is with a student over the age of 18 years, is consensual or non-consensual, or is condoned by parents or caregivers.

Staff are reminded that:

- the law prohibits sexual relations with a person under the age of consent (16 years); and
- the law prohibits sexual relations between a teacher and their student under the age of 17 years.

Staff must also not engage in grooming or other forms of sexual abuse or reportable conduct.

Should staff form concerns that a student is being overly familiar, seeking to establish a relationship or has a crush on them, that staff member must report their concerns to their manager and/or the

Principal as soon as possible so that a plan can be established to manage the situation effectively and sensitively.

It is also important to note that a professional boundaries issue may arise if a staff has a romantic, sexual or overly personal relationship with a former student. Relationships formed during a student's enrolment at the School can create a power imbalance that may continue for a number of years. At the very least, a staff member must not have a relationship of any kind with a former student within two years after they have left the School (regardless of their age).

4 Meeting With Students

Staff should only meet with students for valid work-related purposes (such as counselling or meeting a student on an ad hoc basis to help them with assessments or other school-related issues), and only to the extent that it is necessary to achieve that purpose.

One-on-one meetings should generally only occur where it is not practicable for another staff member to be present (e.g. counselling sessions). Staff should otherwise avoid situations where they are alone in an enclosed space (e.g. in a room with a closed door) with a student.

If staff are meeting or having a private conversation with a single student, then staff should:

- Hold the meeting at school, during normal school hours and, wherever possible, generally only in settings where other people are also present in the general area or able to observe the meeting (unless this is not practicable due to the inherent nature of the meeting, for example, a counselling session).
- Consider the time and venue carefully to ensure the safety and wellbeing of the student is not compromised and avoid compromising the staff member and the School.
- Ensure that the door is left open where possible.
- Avoid locating themselves between the student and the door.

If there are issues complying with the above, staff should notify their manager or the Principal (preferably before the meeting takes place).

5 Transporting Students

Staff must not drive a student in their private vehicle unless they have specific permission from the School to do so. In the event of an emergency, staff should exercise discretion (for example, by ensuring that a student sits in the back seat of the vehicle) and subsequently report the matter to their manager.

6 Confiscation of Student Property

Students and their belongings should only be searched in the presence of two staff members, with the knowledge of the Principal or one of the Head of Sub Schools (unless a staff member is acting urgently to address a reasonable concern about a serious risk to a student or colleague's safety and wellbeing), and in accordance with the School's student behaviour management policies and procedures.

When confiscating personal items, such as mobile phones or hats, staff should ask the student to hand the items to them. Staff should only forcibly take items directly from students in circumstances where the staff member is reasonably concerned about a serious risk to a student or colleague's safety and wellbeing.

7 Physical Contact With Students

Staff must not impose corporal or physical punishment on a student, or engage in physical violence.

Staff should minimise physical contact with students and avoid any unnecessary contact. When physical contact with a student is a necessary part of the teaching/learning experience, or to protect a student or others from imminent harm, staff must exercise caution to ensure that the contact is appropriate and necessary.

Physical contact of a limited duration and respectful nature that would generally be acceptable between acquaintances (e.g. high-fiving, shaking hands) may occur. However, staff must refrain from engaging in physical contact with students if there is a chance that it may be perceived as inappropriate by the student or other people.

For example:

Whilst a teacher may view patting a student on the shoulder or hugging the student to be a kind-hearted gesture, some students may find this uncomfortable. Staff should always be mindful about how students, staff or members of the school community may perceive or misconstrue those interactions. Always ensure interactions with students have a valid professional context and basis.

Under no circumstances should a staff member have physical contact with a student which:

- involves contact with a student's genitals or private areas;
- could be perceived as romantic or sexual (e.g. touching hair, tickling); or
- could be perceived as overly physical (e.g. wrestling, horseplay).

If a student withdraws consent to physical contact (either verbally or by their conduct, e.g. pushing the staff member away), then the staff member should refrain from any further contact.

If a staff member is required to touch a student in the course of assessing them for injury or illness, the staff member must advise the student prior to instigating contact and seek (where practicable) the student's consent. Staff should not perform medical assessments on students unless they are qualified and authorised by the School to do so.

If staff are required to restrain a student from self-harm, or harm to others, any reasonable force used must be in accordance with the School's student behaviour management policies and procedures, or a student's individual management plan. Such incidents must be reported to the Principal.

If inadvertent physical contact occurs, and this is significant contact or may involve contact between a staff member and a private part of a student's body (e.g. chest, groin, buttocks), a file note should be promptly made and forwarded to the Principal.

Staff should exercise caution when attending to the toileting needs of young children or students with a disability and ensure that the door remains open where it is appropriate. Where a student requires

assistance with toileting due to disability, staff should act in accordance with the student's individual management plan.

8 Electronic and Private Communications With Students

Staff must only communicate with students through School channels (i.e. using the School's own email addresses, systems and devices), except where the School has expressly approved otherwise.

Communications with students must always have a valid professional context and use appropriate and professional language. Staff should be particularly careful about the use of emojis; for example, including 'eggplant' and 'loveheart' emojis in emails to students would be unacceptable.

Staff should only communicate with students during normal school hours, except where it is not practical to do so.

For example:

Sending an email to a student's school email address at night simply attaching assessment results is acceptable. However, sending an email to a student about non-school matters outside school hours, or to a student's private email address, is not acceptable. Similarly, staff should refrain from engaging in back-and-forth emails with students outside school hours, when the discussion could wait until the following day.

Staff must not invite students to join their personal electronic social networking site or otherwise engage with students on social media except through authorised channels (e.g. on the School Facebook page, or where the use of social media for a valid work-related purpose has been approved by the School).

Teachers who have been given permission by the School to integrate social media into their professional practice, must ensure that any personal content associated with staff member's account is not accessible to students.

Staff must only use students' personal contact details for valid work-related purposes.

Staff must not give out their personal telephone numbers or contact details (including social media contact details) to students, except where the School has expressly approved otherwise.

Staff must not view a student's social media page or platform, nor should they connect, interact or correspond with students on social media (regardless of who initiated the contact).

9 Photography and Video Recordings of Students

School photography and video recordings, including photographs of students, are only allowed with the Senior Head of Marketing & Community Engagement approval.

10 Staff Are Entitled to Personal Lives

The School recognises that many staff have children of their own, and in any case will socialise with other adults who may have children, who are enrolled as students. Such staff will have legitimate reasons for socialising around, and on occasion with, those students.

This Schedule is not intended to interfere with a staff member's right to a private life or to provide socialisation with friends and family. However, working at the School requires a serious commitment to student safety and wellbeing. Furthermore, Teachers are always in a position of trust and authority with their students, whether they are interacting with the students in or outside the school setting.

Accordingly, in all aspects staff are expected to conduct themselves in a way consistent with this Schedule, including by avoiding in private and social situations (including on social media) behaviour which could be perceived as contrary to this code or involving a risk to student safety and wellbeing.

For example:

- A staff member's interaction with a student in the course of carrying out their duties and responsibilities to the School should always strictly comply with this code.
- Staff should refrain from transporting students other than their own to and from work, or during the workday, even if they are friends with the student's parents. Where this is necessary, permission should be obtained from one of the Deputy Principals.
- Social contact with a student, who is not a family member, should arise from a social relationship with the student's parents (rather than from a social relationship with the student directly). Staff should avoid being alone with a student in these situations, or communicating electronically or online with a student, without the parents' knowledge and consent.
- Staff should conduct themselves in a way that will not give others reason to question whether they are crossing professional boundaries with a student.
- Teachers should notify one of the Head of Sub Schools if they become aware they are teaching a relative, or child of a close friend or romantic/sexual partner. This is necessary to enable the School to manage any conflicts of interest which may arise and is not necessarily a reflection on the staff member's professionalism.
- Children of staff members may only be in the staff room if it is outside normal work hours (e.g. dinner time for when a function is on).
- Children of staff members should not be in shared staff offices.

11 Managing a Concern That Your Actions May Have Crossed Professional Boundaries

Staff should report to their manager or the Principal any concern that their own behaviour, the behaviour of a student towards that staff member, or the behaviour of another staff member, has (or may have) crossed professional boundaries as soon as possible so that a plan can be developed to manage the situation appropriately. This includes, for example, situations where a staff member is concerned that a colleague may be too close to one student (irrespective of whether there is any 'evidence' of a romantic or sexual relationship).

If a student instigates conduct that crosses professional boundaries, staff must make clear to the student that the conduct is inappropriate. If the student continues to engage in such conduct, staff should remove themselves from the situation once they have made sure that doing so will not pose a safety and wellbeing risk to the student (e.g. if the student would otherwise be left unsupervised).



Student Safety and Wellbeing – Raising and Responding to Student Safety Concerns Policy

Last Review: 24 th June 2025	Constructed / Reviewed by: The Knox School, on advice from Russell Kennedy Lawyers and with input from the School Community.
Next Review: 24 th June 2027 (and every two years thereafter in accordance with the School's review cycle, or more frequently as required)	Approval Required: Board
Document Date: 24 th June 2025	Board Sign Off Date: 24 th June 2025

1 Statement of Context and Purpose

The Knox School (**the School**) is committed to protecting its students from all aspects of harm, and has established strategies, practices, policies and procedures to uphold this public commitment.

Any reference to '**students**' in this policy (or the School's student safety framework more generally) refers to all students enrolled at the School, irrespective of whether they are a domestic or international student.

The School takes a zero-tolerance approach to any behaviours that jeopardise student safety and wellbeing (including all forms of child abuse and reportable conduct). The School regards its student safety responsibilities with the utmost importance and strives to deliver an educational curriculum that promotes the School's ethos, vision and values of *Achievement, Responsibility, Respect, Resilience and Care and Empathy*.

The School's aim is to create an environment where students can learn in a calm and focused environment characterised by ethical behaviour and defined professional boundaries, and where they feel safe and supported by the School.

This policy sets out in an accessible, child focused, culturally safe and easily understood manner, the ways in which concerns about all forms of child abuse and other reportable conduct:

- may be brought to the School's attention; and
- will otherwise be dealt with, both internally and in accordance with the School's external reporting obligations.

Other concerns may be raised by members of the School community in accordance with the *Grievance Policy*.

This policy is a procedure for responding to and reporting child abuse allegations for the purpose of *Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises*, and part of the School's student safety and

wellbeing framework (underpinned by the *Student Safety and Wellbeing Policy*).

2 Application

This policy applies to all Board members, employees, volunteers, contractors, labour hire workers, secondees and other authorised personnel required to perform functions on the School's premises, or at School-organised activities and events. Collectively, these individuals are referred to as 'staff'.

This policy extends to any other person who is engaged in student-connected work at the School, or that otherwise has direct and regular contact with the School's students (whether supervised or not).

3 Related Documents

3.3 Legislation

- *Crimes Act 1958*(Vic)
- *Worker Screening Act 2020*(Vic)
- *Education and Training Reform Act 2006*(Vic)
- *Child Wellbeing and Safety Act 2005*(Vic)
- *Children, Youth and Families Act 2005*(Vic)
- Ministerial Order No. 1359

3.4 Overview of Student Safety and Wellbeing Policies and Documents

Document	Overview
Student Safety and Wellbeing Policy	This policy sets out the School's overarching obligations and commitment to ensuring student safety and wellbeing, and summarises the School's strategies for achieving these. The policy also explains how the School's other student safety and wellbeing policies and procedures interact.
Student Safety and Wellbeing Policy – ELC	This policy outlines the School's child safety and wellbeing requirements specific to the ELC, including National Quality Framework obligations, ACECQA reporting requirements, ELC-specific conduct standards, safe digital device practices, supervision and environment standards, and reporting obligations.
Student Safety and Wellbeing – Staff Code of Conduct	This code outlines what staff behaviours align with the School's commitment to student safety and wellbeing, and what behaviours are unacceptable.
Student Safety and Wellbeing – Raising and Responding to Concerns Policy	This policy outlines how members of the School community may raise concerns about child abuse, reportable conduct and other student safety and wellbeing matters. This policy sets out how the School will respond to such concerns (including by complying with the School's mandatory reporting obligations).

Student Safety and Wellbeing – Recruitment and Employment Policy	This policy outlines the School's recruitment lifecycle, from preparing the position description through interviews, screening and induction. It details the mandatory student safety checks (VIT registration, WWCC, National Police Checks, reference checks) required for staff, volunteers and contractors, along with post-recruitment obligations such as ongoing training and supervision.
Student Safety and Wellbeing – Record Retention Policy	This policy outlines the School's obligations with respect to keeping records relating to the care, safety and welfare of students, and adopts the Public Record Office Victoria Recordkeeping Standards.

3.5 Fact Sheets

- [Grooming offence | Department of Justice and Community Safety Victoria](#)
- [Failure to disclose offence | Department of Justice and Community Safety Victoria](#)
- [Failure to protect: a new criminal offence to protect children from sexual abuse | Department of Justice and Community Safety Victoria](#)

3.6 Other

- VRQA Guidelines of the Enrolment of Overseas Students Aged Under 18 Years
- National Code of Practice for Providers of Education and Training to Overseas Students

4 Definitions

Schedule 1 of the *Student Safety and Wellbeing Policy* sets out the key definitions used in the School's student safety and wellbeing framework. For ease of reading, the two definitions are reiterated below.

Mandatory reporter has the meaning given to it by section 182 of the *Children, Youth and Families Act 2005* (Vic) (**CYF Act**). It includes but is not limited to registered teachers (including early childhood teachers), staff with post-secondary qualifications employed in the care, education or minding of children, school principals, registered nurses, students in training to become teachers (who have been granted permission to teach under relevant legislation), registered psychologists, out of home care workers, early childhood workers and any other person referred to in section 182 of the CYF Act.

Reasonable belief means a belief that would lead a reasonable person in the same position as you, and with the same information as you to form a belief that child abuse (including sexual abuse) or reportable conduct is occurring or may occur. There must be some objective basis for the belief. However, it is not necessary to have proof to form a reasonable belief, nor do you need to make a judgement about the truth of an allegation. However, a reasonable belief is more than suspicion, mere rumour or speculation. Examples on circumstances where a reasonable belief may be formed are provided in this policy.

5 Relevant Principles

The School and its staff have a variety of mandatory reporting obligations in relation to child abuse and other reportable conduct. The School is guided by this policy to fulfil its (and its staff's) obligations and aims to ensure that:

- Staff, students and members of the school community feel encouraged to raise concerns in accordance with this policy.
- Its Student Safety Officers are carefully selected based on certain attributes and their role in the School.
- Contact details of Student Safety Officers are readily available and widely known to the school community.
- All concerns are treated seriously, with the utmost importance and are responded to in a prompt, appropriate, sensitive and thorough fashion.
- All concerns raised in accordance with this process are acted on promptly and thoroughly.
- The School and its staff have knowledge and an understanding of their legal obligations with their reporting obligations and comply with these proactively.
- The School's processes for responding to concerns (and the complaints process generally) are legally compliant (with regard to privacy laws, reporting obligations and employment law), culturally safe and understood broadly - including by children and young people, families and staff.
- Age and culturally appropriate safety information is provided to students about: what to do and who to contact in the event of an emergency; and how report a student safety concern (which includes, but is not limited to an allegation of sexual, physical or other abuse).
- Investigations are conducted fairly and without bias, promptly and without undue delay.
- All reasonable steps are taken to protect the identity and wellbeing of a student who is the subject of a concern, and no adverse action is taken against a person who raises a concern (or is a child or young person who is the alleged victim of child abuse or reportable conduct).
- All reasonable steps are taken to co-operate with law enforcement agencies regarding concerns, and that these are reported to relevant authorities regardless of the legal obligation to do so.
- Members of the school community understand and have confidence in the processes that will be followed by the School in response to concerns.
- This policy is student-focused and can be easily understood by the school community, in particular students.

When complying with this policy, it must be appreciated that fulfilling the roles and responsibilities contained herein will not displace or discharge any other obligations that arise if a person reasonably believes that a student is at risk of child abuse or reportable conduct.

6 Raising Concerns

6.3 How the School Community May Raise Concerns with the School

If you have a belief that a student is in immediate danger, you should immediately phone the Police on 000.

If you are a member of the school community (other than a member of staff), with a concern about child abuse or reportable conduct involving a student, then you are encouraged to raise that concern with the Principal, a member of the Executive Team, or a Student Safety Officer.

Relevant contact details for the School's Student Safety Officers are set out in the below table:

Name	Position	Contact Details
Ms Nikki Kirkup	Principal	Nikki.Kirkup@knox.vic.edu.au
Ms Toni-Ann Bright	Head of Community, Culture and Operations	Toni-Ann.Bright@knox.vic.edu.au
Mr Simon Cowell	Head of Junior School	Simon.Cowell@knox.vic.edu.au
Ms Janelle Mathias	Head of Senior School	Janelle.Mathias@@knox.vic.edu.au
Mr Nathan Bower	Head of Sport, Strategy and Programs	Nathan.Bower@knox.vic.edu.au
Student Safety Officers can also be contacted via Reception on (03) 8805 3800 .		

The School has appointed the Principal as its senior Student Safety Officer. The Principal has an important role in the promotion and maintenance of a student safe culture at the School. The Principal is also responsible for ensuring overall School compliance with the processes outlined in this policy.

Where a concern relates to a Student Safety Officer, it should be reported to the senior Student Safety Officer.

As the safety and wellbeing of students is the School's paramount consideration, you are encouraged to make a report, whether or not you have formed a belief on reasonable grounds that child abuse or reportable conduct has occurred.

6.4 How Staff Will Deal with Their Own Concerns

Staff with, or who are aware of concerns about child abuse or reportable conduct must also address any concerns they may have in accordance with this policy.

6.5 Concerns about the Principal or the Board

Where a concern relates to the Principal or a Board member, concerns should be raised with the Chair of the Board via email at board.chair@knox.vic.edu.au

In those circumstances, the Chair of the Board will be responsible for meeting the Principal's responsibilities as set out in this policy.

6.6 The School's Response

This section sets out how the School will acknowledge a concern about child abuse or reportable conduct involving a student.

6.7 Receiving a Concern

A member of School staff, upon becoming aware of a concern, is required to:

- Listen to the concern in a considerate, patient and supportive manner (and appropriately where the concern is coming from a student).
- Identify the party or parties involved.
- Confirm the basic details, without seeking extensive information, casting judgment or asking suggestive or leading questions.
- Take a detailed file note.
- Remain balanced and not assess the validity of the concern(s) being raised.
- Explain that other people may need to be informed about the concern, in order to stop any inappropriate or unlawful behaviour and to comply with the School's legal obligations and procedures.
- Confirm that the School takes the concern seriously.
- Offer support to the student(s) involved in the concern, and their families. This may include encouragement to access confidential wellbeing and support services, either internal or external to the School.
- Outline the process that will be followed by the School in dealing with the concern, in accordance with this policy.

The member of School staff should then:

- Promptly and thoroughly manage the response of the School (including by monitoring the School's overall compliance with this policy and accounting for alternatives if the staff member allocated to resolve the concern is unable to perform their role).
- Comply with their personal reporting obligations as set out in this policy.
- Notify the Principal, a Student Safety Officer or member of the Executive Team, about the concern.
- If the Student Safety Officer or member of the Executive Team is the subject of the concern, notify the Principal about the concern.

- If the Principal is the subject of the concern, notify the Chair of the Board about the concern.

The School will then take such steps as it considers appropriate to protect any student connected with a concern until it is resolved, including by:

- Ensuring that any mandatory reporting obligations are met, and also, that allegations, suspicions or disclosures are made to relevant authorities (including but not limited to Victoria Police, Child Protection and SSR) have been met, regardless of whether there is a legal obligation to report.
- Implementing interim measures as required to ensure a student's safety. For example this could include directing a student to learn from home while the School investigates, or removing an international student from homestay accommodation to ensure their safety until such time that the concerns can be fully investigated.
- Having regard to the needs of international students in homestay accommodation and seeking to ensure that additional supports are provided in a manner that meets their particular needs.
- Having regard to the needs of vulnerable students and seeking to ensure that additional supports are provided in a manner that meets their particular needs.
- Offering wellbeing support at School.
- Working with the student and their family to determine what other considerations should be taken into account when seeking to protect the student until the grievance is resolved.

6.8 Resolving the Concern

The School will investigate the concern where appropriate, which will ordinarily require a determination, on the balance of probabilities, whether the concern is substantiated or not.

When doing so, the School will take into account the diversity and characteristics of the school community to ensure equity is upheld and act to reduce barriers to inclusion.

The decision-maker will usually be the Principal (or their nominee), although where the concern relates to the alleged conduct or misconduct of the Principal then the decision-maker will be the Chair of the Board. The School may rely on legal or third-party assistance to investigate or determine the concern.

Where a concern involves allegations against a staff member, the School will need to notify the staff member about those allegations (to the extent that it is appropriate to do so, which may initially involve only notification that there has been a concern), outline the process to be followed, and advise the staff member about the process pending the resolution of the concern (which may, in appropriate cases include the staff member being stood down, without judgment, while the concern is being dealt with).

To the extent that the School decides it is appropriate or practicable to do so, any investigation will usually involve:

- Interviewing the subject of the concern and key witnesses or individuals (noting that more than one interview may be required).
- Reviewing relevant documents, correspondence and materials of substance.
- Taking notes of any interviews (or where appropriate, transcripts of audio recordings of any interviews) during the investigation.
- The relevant decision-maker determining whether, on the balance of probabilities, the concern is substantiated.

Witnesses being interviewed will not be unreasonably refused a support person.

If a concern is substantiated, the School will take appropriate action (which may, in the case of a current staff member, potentially include summary dismissal for serious misconduct). Even if a concern is not substantiated, the findings made by the School during the course of investigating the concern may, in certain cases, still result in disciplinary action (including dismissal).

Following the conclusion of its investigation, the School will indicate the outcomes of the investigation to:

- The person, or student who raised the concern.
- The person subject of that concern (where appropriate).
- Any external authorities (including but not limited to SSR, Child Protection and Victoria Police) to whom a report is required to be made.

6.9 The School May Adjust This Policy to Reflect the Circumstances

This policy applies regardless of whether the alleged behaviour which is the subject of a concern, occurred on or outside School grounds, or concerns current or former students.

It may not be appropriate or possible for the School to investigate a concern in strict accordance with this policy where a concern is raised with the School and:

- An investigation by Victoria Police, SSR or VIT relevant to the concern is ongoing.
- Civil or criminal proceedings relevant to the concern are ongoing.
- The concern relates to the conduct of current or former students.
- The concern relates to the conduct of former staff.

In such circumstances, the School will seek and act on legal advice to comply with this policy to the extent it is appropriate to do so (and in particular to protect the safety and wellbeing of all current students of the School).

6.10 Keeping the School Informed

It is the School's preference that members of the school community (including students, staff, volunteers, parents, etc.) promptly inform the Principal, a member of the Executive Team or a Student Safety Officer of any matters on the subject of a potential reporting obligation under this policy which relate to the school community, so that the School can coordinate the information and support the Police and affected students and their families as required.

However, the School appreciates that in some cases it will be necessary for an external report to be made before the School is notified (and nothing in this policy is intended to limit a person's right, or obligation, to make external reports). At the very least, the Principal, a member of the Executive Team, or a Student Safety Officer should be notified after an external report is made.

6.11 Reflection and Continuous Improvement

It is important that the School's student safe practices are subject to continuous improvement.

The School will analyse concerns and incidents to identify causes and (if applicable) systemic changes to inform continuous improvement.

The School will report on the findings of relevant reviews of student safety and wellbeing practices to staff, students and the community, particularly where the School's usual practices are improved as a result.

7 Other Considerations

7.3 Concerns relating to other students

This policy also applies to concerns involving the behaviour of other students.

For example, mandatory reporting obligations are not limited to the actions of staff, and the failure to disclose offence can also apply to alleged sexual activity by adult students.

Where a concern involves child abuse or other inappropriate behaviour allegedly perpetrated by a student, the School will comply with its mandatory reporting obligations, and may otherwise exercise its discretion to inform the Sexual Offence and Child-Abuse Investigation Team (**SOCIT**).

Subject to any Police clearance which may be required, the School will otherwise deal with student-on-student behavioural issues in accordance with its student behavioural management procedures and any other relevant student discipline policies and procedures.

7.4 Information provided to students

Students are provided with age-appropriate information during class time and through School assemblies about what to do in response to an allegation of suspected child abuse and the need to promptly alert a member of staff if they believe that they, or a peer, is suffering from child abuse or reportable conduct.

Information provided to students includes, but is not limited to:

- Remain calm.
- Promptly seek help and speak to a trusted staff member (including a member of the Executive Team or a Student Safety Officer) about the concern.
- Remember this is not your fault, you are not to blame and are not in trouble.
- Tell the story in your own words, with as much detail as you can.

- Do not be afraid of saying the “wrong” thing.
- Listen carefully to any instructions you receive from staff (or if applicable, the Police or other authorities).
- Listen carefully to information you receive from staff about what will happen next (for example, and subject to the circumstances, authorities notified, parents informed, internal and/or external investigation).
- Be reassured that that you have done the right thing.

7.5 Records

The School will make, keep and secure clear and contemporaneous records of any concerns raised in accordance with this policy, and the steps taken by the School to respond to those concerns, in accordance with the *Student Safety and Wellbeing – Record Retention Policy*.

The School will also create, maintain and dispose of any records about student safety and wellbeing in line with the Public Record Office Victoria Recordkeeping Standards, including minimum retention periods regarding these obligations. In addition, the School will ensure all staff understand relevant obligations in relation to information sharing and record-keeping.

7.6 Support

The School will afford appropriate support to students the subject of, or otherwise connected to, concerns raised under this policy, particularly until the concern is resolved.

If a concern involves a student who identifies as Aboriginal or Torres Strait Islander, or is from a culturally and/or linguistically diverse background, has a disability or is otherwise vulnerable (including without limitation students who identify as LGBTQI+, or are unable to live at home), steps will be taken to ensure that the student, and their family, is supported to understand the situation and are supported (including via the use of an interpreter where required).

The School will also provide appropriate support to staff who make mandatory reports under this policy, or who are assisting the School or families with the process outlined in this policy.

7.7 Cooperation with authorities

The School will cooperate with any external authorities (including but not limited to SSR, Child Protection and Victoria Police) in relation to a concern or report (whether made under this policy or otherwise).

7.8 Confidentiality

Appropriate confidentiality will be maintained at all times when dealing with concerns under this policy, with information only being provided to those who have a right or otherwise, on a “needs to know” basis.

7.9 Communication

Where appropriate, the School will provide parents, carers and guardians with guidance and support

where a student is the subject of a concern.

Staff do not require consent from a student's parents before making a mandatory report in accordance with this policy. Similarly, staff are not required to disclose that a mandatory report has been made.

However, the School will keep families updated as it considers appropriate about the way in which it is dealing with concerns affecting that family's child.

7.10 Victimisation is Not Tolerated

The School will not tolerate victimisation towards someone because they have raised or participated in a process contemplated by this policy, including by raising a concern or making a mandatory report.

8 The School's Reporting Obligations

This section sets out the out the main mandatory reporting obligations that apply to the School and its staff.

The School treats seriously its reporting obligations and recognises that student protection is everyone's responsibility. Whilst the Principal, the Executive Team and Student Safety Officers are primarily entrusted with day-to-day responsibility for ensuring that these reporting obligations are met, all staff and appropriate personnel are required to uphold the ethos of this policy by ensuring that student safety and wellbeing matters are reported internally, and externally where required.

Staff will receive training on their personal reporting obligations to achieve this, which are summarised below:

8.3 Reporting a Sexual Offence: Failure to Disclose Offence

The *Crimes Act 1958*(Vic) makes it a crime to fail to disclose a sexual offence against a child.

As a result, anyone (and not just a not just professionals who work with the School's students, or with children and young people generally) aged 18 or over must make a report to Victoria Police if they form a reasonable belief that a sexual offence has been committed against a child under the age of 16 years, by a person aged 18 years or over.

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 student states that they have been sexually abused.
- A student states that they know someone who has been sexually abused (sometimes the student may be talking about themselves).
- Someone who knows a student states that the student has been sexually abused.
- Professional observations of the student's behaviour or development leads a

professional to form a belief that the student has been sexually abused or is likely to be abused.

- Signs of abuse lead to a belief that the student has been sexually abused.

If you are not sure whether you have a reasonable belief, you must consult with the Principal, a member of the Executive Team, a Student Safety Officer or the appropriate body to which a report must be made.

If you have formed a reasonable belief in relation to a sexual offence, you must immediately report the belief to Victoria Police by calling 000 in an emergency or otherwise, to SOCIT.

You must then make a further report on each occasion on which you become aware of any further reasonable grounds for the reasonable belief.

Please note that fulfilling the roles and responsibilities contained in this policy do not displace or discharge any other obligations that arise if you reasonably believe that a child is at risk of child abuse.

Failure to make a report without reasonable excuse is an offence under section 327 of the *Crimes Act 1958*(Vic) and carries a potential term of imprisonment.

However, it may not be an offence not to disclose a sexual offence against a child to Victoria Police if you have a reasonable excuse. You may have a reasonable excuse if you:

- Have a reasonable fear that reporting your reasonable belief to Victoria Police may pose a risk to your own or another person's health and safety (including the relevant child or young person, but not including the alleged perpetrator of sexual offence).
- Were told about the sexual offence by the alleged victim, who was 16 or older at the time they disclosed the abuse, and they have asked you not to report the abuse.
- Believe on reasonable grounds that the information has already been disclosed to Victoria Police by another person (such as a Child Protection authority) and you have no further information.

If there is uncertainty about the need for a report to Police (or another body) you should seek advice from the Principal, the Executive Team or a Student Safety Officer about whether you are still required to make a report.

8.4 The Reportable Conduct Scheme

The *Children Wellbeing and Safety Act 2005* (Vic) established the Reportable Conduct Scheme (**Scheme**) managed by SSR. The Scheme requires the School to report and investigate reportable allegations (as defined in Schedule 1: Student Safety and Wellbeing Definitions in the *Student Safety and Wellbeing Policy*) against a current member of staff.

The Principal (or their delegate) will notify SSR of any alleged reportable conduct or alleged misconduct that may involve reportable conduct in respect of a staff member.

A disclosure can be made using an online form available on SSR's website. SSR may also be

contacted by phone on 1300 310 778 or by email at contact@ssr.vic.gov.au in relation to any queries.

Further, the Scheme requires the head of an entity (the Principal) to do certain things upon becoming aware of a reportable allegation about a member of staff. These obligations include, but are not limited to, managing any immediate risks to students, making reports as required by law and investigating the allegations when appropriate clearance has been received (refer below).

Where a reportable allegation is about the Principal, the Chair of the Board will assume responsibility for complying with the head of entity's obligations under the Scheme.

As soon as practicable after becoming aware of a reportable allegation, the head of the entity must respond to the reportable allegation by making the notifications to SSR and investigating the allegation:

- Initial notification – within three (3) business days after becoming aware of the reportable allegation.
- Update – as soon as practicable and within thirty (30) calendar days after becoming aware of the reportable allegation.
- Advice about investigation – as soon as practicable.
- Outcome(s) of investigation – as soon as practicable.

8.5 Mandatory Reporting

Mandatory reporters (as defined in Schedule 1: Student Safety and Wellbeing Definitions in the *Student Safety and Wellbeing Policy*) have mandatory reporting obligations under the *Children, Youth and Families Act 2005* (Vic). Failure to make a mandatory report can constitute an offence under that Act.

If you are a mandatory reporter, and you have formed a reasonable belief that:

- a child has suffered, or is likely to suffer, significant harm, as a result of physical injury or sexual abuse; and
- the child's parents have not protected, or are unlikely to protect, the child or young person from harm of that type.

You must immediately report the belief to Child Protection by calling 1300 655 795 during business hours, or 13 12 78 after hours. Additional reports must be made on each occasion where a mandatory reporter becomes aware of any further reasonable grounds for the belief.

Staff must check whether they are mandatory reporters.

A mandatory reporter must make a report even if a SSO does not share their belief that the report must be made. The School will afford support where appropriate to mandatory reporters who make a report under this policy.

8.6 Victorian Institute of Teaching (VIT)

In accordance with the *Education and Training Reform Act 2006* (Vic), the School must notify VIT if it has taken any action against a registered teacher in response to allegations:

- Of serious incompetence.
- Of serious misconduct.
- That the teacher is unfit to be a teacher.
- That the teacher's ability to practice as a teacher is seriously detrimentally affected, or likely to be seriously affected, because of an impairment.
- Any other actions against a registered teacher that may be relevant to their fitness to teach.

The School must also notify VIT if it becomes aware that a registered teacher has been:

- Charged with, convicted or found guilty of certain criminal offences that affect the right to hold a Working with Children Check (WWCC).
- Given a negative notice in relation to a WWCC.

8.7 Referral to Child FIRST/Orange Door

A referral to Child FIRST/Orange Door should be considered if, after taking into account the available information, a staff member forms a view that the concerns have a low-to-moderate impact on the wellbeing of a student under the age of 17 years, but the student is not at risk of significant harm (meaning a mandatory report is not required).

Anyone with a concern for a student's wellbeing can make a referral to Child FIRST/The Orange Door. If the Principal does not wish to make a mandatory report, this does not discharge the mandatory reporter's legal obligation to do so *if the mandatory reporter continues to hold a reasonable belief that abuse or a sexual offence may have occurred* (including in circumstances where the student's parents have not or are unlikely to protect their child from that harm). In that circumstance, the mandatory reporter must still make a report to Child Protection or a referral to Child FIRST/Orange Door and in the case of a sexual offence, Victoria Police.

Examples of situations where a referral to Child FIRST/The Orange Door may be appropriate include:

- Significant parenting problems that may be affecting the student's development.
- Family conflict, including family breakdown.
- A family under pressure due to a family member's physical or mental illness, substance abuse, disability or bereavement.
- Young, isolated and/or unsupported families.
- Significant social or economic disadvantage that may adversely impact on a student's care or development.

Many cases will not fit neatly into these categories. For guidance about whether a referral to Child FIRST/The Orange Door should be considered, staff can refer to the School's Student Safety Officers and information available on the DFFH's website.

Please note that whilst Child FIRST acts as the access point for family services, it is progressively transitioning to the Orange Door. Child First/Orange Door can be contacted at 1800 319 353.

9 Communication and Implementation

9.3 Communication

This policy is made publicly available on the School's website.

This policy is available to staff as part of the School's and the Board's internal policies and procedures. Aspects of (and updates to) the School's student safety and wellbeing framework, including this policy will be addressed in the School's professional development updates, training programs, bulletins and newsletters.

9.4 At Board / Principal Level

To properly implement this policy:

- (a) The Board and Principal will review this policy and the School's student safety and wellbeing practices at least every two years (or more frequently after a significant student safety and wellbeing incident) and implement improvements where applicable.
- (b) Families and the school community will be afforded the opportunity to contribute to the review and development of the School's student safety and wellbeing policies and practises (including this policy).
- (c) Periodic training and refresher sessions on this policy are provided to all staff.
- (d) The Principal is responsible for monitoring staff compliance with this policy. All staff must ensure that they abide by this policy and assist the School implementing this policy.

9.5 At Other Levels

To properly implement this policy, all staff must ensure that they will abide by this policy and assist the School in the implementation of this policy.

Student Safety and Wellbeing – Recruitment and Employment Policy

Last Review: 5 th June 2026	Constructed: Russell Kennedy Lawyers.
	Reviewed by: Executive
Next Review: 5 th June 2027 (and every two years thereafter in accordance with TKS's review cycle, or more frequently as required)	Approval Required: Board
	Board Sign Off Date: 23 rd June 2026

1 Statement of Context and Purpose

The Knox School ("TKS") is committed to continuous improvement in the quality of the organisation through the recruitment of high calibre staff at all levels and maintaining a consistent recruitment and selection process that applies the principle of merit-based selection. This consists of an assessment of overall level of skill, knowledge, experience and relevant qualifications, in accordance with the requirements of the Position Description. The methods used to assess the most suitable candidates may include but not be limited to, interviews, reference checks, classroom observation lessons and capability-based assessments including psychometric testing.

TKS is committed to recruitment practices that do not discriminate and are in compliance with all relevant legislation, in particular, anti-discrimination and student safety laws. All persons undertaking a recruitment process must have sufficient understanding of these laws and must seek appropriate assistance from TKS to ensure these obligations are met.

TKS will recruit new staff fairly and based on merit – that is, the candidate who is the best person for the job.

The purpose of this policy is to establish an employment practices framework that gives effect to these objectives.

Global Student Safety Mandate:

All recruitment and employment practices at The Knox School (TKS) must explicitly prioritise student safety and wellbeing. Individual capability, qualifications, and safety screening are assessed at every stage of the lifecycle below. For detailed compliance rules, indicators of harm, and ongoing training frameworks, see Section 30 (Overarching Recruitment Principles) and Section 155 (Ensuring Student Safety Post Recruitment)

2 Summary

End-to-end recruitment lifecycle

Please follow these eight sequential phases for every standard recruitment process:

2.1 Prepare Position Description:

Phase 1

Draft a comprehensive position description detailing the nature of the role, essential duties, values, and key selection criteria. If the role involves child-connected work, it must explicitly outline specific student safety requirements and responsibilities.

2.2 Advertise Role:

Phase 2

Publicly market the vacant position. All recruitment advertisements must feature a clear, mandatory statement setting out the school's zero-tolerance stance on child abuse and the occupant's essential qualifications and attributes regarding student safety.

2.3 Screen Applications:

Phase 3

Acknowledge all applications and screen resumes against the position description. Perform initial validation to ensure candidates hold a current, valid Victorian Institute of Teaching (VIT) registration or Working with Children Check (WWCC) clearance status.

2.4 Conduct Interviews:

Phase 4

Convene a recruitment panel of at least two staff members to conduct an interview (face-to-face where possible). Use technical, behavioural, and cultural questions to objectively assess merit, values alignment, and suitability for working with students.

2.5 Complete Reference Checks:

Phase 5

Obtain applicant permission during the interview to contact at least two former or current employers. Conduct targeted reference checks that explicitly address the applicant's historical suitability for student-connected work and safe environment practices.

2.6 Verify Documents:

Phase 6

Collect and formally verify mandatory credentials. This includes sighting a minimum of 100 points of personal identification, certified proof of professional qualifications, a satisfactory National Police Check, and right-to-work documentation.

2.7 Make Conditional Offer:

Phase 7

Issue an employment agreement. All formal offers of employment remain strictly conditional upon the successful verification of all screening checks, references, signed pre-employment health declarations, and any required medical fitness assessments.

2.8 Complete Induction and Training:

Phase 8

Ensure all newly appointed staff, volunteers, and contractors complete the compulsory TKS induction program prior to commencement. This includes passing mandatory student safety modules, reviewing the Staff Code of Conduct, and logging completed records in Synergetic.

3 Application

This policy applies to all Board members, the Principal, employees, volunteers, contractors, labour hire workers, secondees, homestay providers, approved student support providers and other authorised personnel who offer facilities or services to TKS, or are required to perform functions on TKS's premises, or at School-organised activities and events. Collectively, these individuals are referred to as **'staff'**.

Any concerns or discrepancies identified during the screening or reference check stages must be immediately escalated to People & Culture (Human Resources) or the Principal before any further steps are taken in the recruitment process.

4 Related Documents

4.1 Legislation

- *Crimes Act 1958*(Vic)
- *Worker Screening Act 2020*(Vic)
- *Equal Opportunity Act 2010*(Vic)
- *Fair Work Act 2009*(Cth)
- *Education and Training Reform Act 2006*(Vic)
- *Child Wellbeing and Safety Act 2005*(Vic)
- Ministerial Order No. 1359 Policies
- VRQA Guidelines of the Enrolment of Overseas Students Aged Under 18 Years
- National Code of Practice of Education and Training to Overseas Students 2018

4.2 Policies

- Student Safety and Wellbeing Policy
- Student Safety and Wellbeing Policy - ELC
- Student Safety and Wellbeing – Staff Code of Conduct

- Student Safety and Wellbeing – Raising and Responding to Concerns Policy
- Student Safety and Wellbeing – Record Retention Policy

5 Overarching Recruitment Principles (Section 30)

TKS is committed to applying the following overarching principles throughout the recruitment process:

Strategic alignment

TKS's recruitment, selection and appointment practices will support the achievement of TKS's strategic and operational objectives. Decisions to recruit should be made with regard to student safety, workforce planning and the goal of improving the performance and standing of TKS.

Merit based

TKS's merit-based selection methods are to ensure recruitment processes deliver high quality staff and selection decisions that are fair, equitable, transparent and consistent. In this context, merit is defined as the skills, knowledge, qualifications, suitability, previous experience and personal attributes that relate to the requirements of the position.

Fairness

All those involved in the recruitment process should carry out their duties without bias or favouritism. Any potential or perceived conflict of interest between parties in the recruitment process should be declared to People & Culture (Human Resources) and Panel Members and is to be avoided, where practicable.

Compliance

TKS will comply with all relevant federal and state legislation in the recruitment and appointment of staff.

Equal opportunity

TKS values equity and diversity and seeks to embody these values in its staff. TKS welcomes applications from Aboriginal & Torres Strait Islander peoples, international people, people from culturally and/or linguistically diverse backgrounds and people with a disability.

Efficiency and candour

TKS recognises that timely decision-making can be critical in securing the best possible applicant, and all processes should be conducted without undue delay. All applicants should be treated with respect and communicated with in a timely manner throughout the recruitment process.

Student safety

TKS takes a zero-tolerance approach to any behaviours that jeopardise student safety (including child abuse and reportable conduct). TKS regards its student safety responsibilities with the utmost importance and strives to deliver an academic curriculum that promotes TKS's values.

TKS is committed to student safe recruitment as required by *Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and Boarding Premises*.

TKS is also committed to ensuring that its recruitment of approved student support providers and homestay families is consistent with the requirements under Ministerial Order No. 1359 and the *VRQA Guidelines for the Enrolment of Overseas Students Aged Under 18 and the Child Safe Standards*.

All applicants for positions involving student-related work are informed about TKS's Student Safety Framework, including the Student Safety and Wellbeing Policy, Student Safety and Wellbeing – Raising and Responding to Concerns Policy, Student Safety and Wellbeing – Staff Code of Conduct and Student Safety and Wellbeing Policy – ELC. All staff (including but not limited to Board members) are required to provide evidence of having completed compulsory student safety training and other training as required before commencing at TKS.

6 Advertising the Position

Position Description

A position description is to be prepared for vacant positions. The position description will describe:

- The nature of the position.
- Essential duties and requirements.
- Key selection criteria (including personal attributes, skills, experience and qualifications, as well as any desired skills and abilities).
- TKS's values.
- Where the role involves child-connected work, will contain:
 - A clear statement that sets out the position's requirements, duties and responsibilities regarding student safety.
 - The essential or relevant qualifications, experience and attributes in relation to student safety required to fulfil the position.

Student safety screening

All applications will be responded to with an acknowledgement of receipt email.

Resumes will be screened against the position description so that initial assessments can be made of the applicant's suitability for the role.

Screening requirements will depend on the role that is being applied for, and whether the position is for an employee, volunteer, labour hire, secondee or contractor position.

TKS will collect and keep a record of all relevant documentation obtained or sighted when screening a prospective staff member's (as defined earlier in this policy) suitability for a role at TKS on its online management system, Synergetic (or otherwise, in hard copy or digital email file prior to being uploaded to Synergetic) in accordance with all applicable laws relating to privacy, including the *Privacy Act 1988* (Cth).

Prospective staff

Suitable applicants for an employee position must:

- Hold, and provide TKS with evidence of, a current valid VIT registration or Working with Children Check (WWCC) clearance status.
- Provide TKS with proof of their personal identity (at least 100 points of identification is required).
- Have a current National Police Check or be willing to obtain one prior to, and/or during the course of their employment. Please note that a National Police Check forms part of the VIT registration process (whereas a WWCC clearance involves a narrower police check).
- Provide TKS with proof of their professional or other essential or relevant qualifications for the role and other experience and attributes relating to student safety and wellbeing.
- Detail and provide to TKS their history of student-connected work.
- Satisfy a reference check that addresses the applicant's suitability for the position and working with students.
- Be informed of, familiar with and agree to abide by TKS's policies and student safety framework prior to commencing at TKS. Suitable applicants are invited to interview.

Applicants who do not meet screening or safety requirements will not be appointed under any circumstances.

Volunteers

All volunteers must agree to abide by TKS's policies and student safety framework prior to commencing at TKS.

All volunteers must present their WWCC number at Reception when signing in using the VPass digital sign-in. Records of this are kept by the School.

Direct contact volunteers

A direct contact volunteer means a person who is involved in providing support, guidance and supervision directly to students and/or who could potentially have direct contact with students during the normal course of their volunteer service.

All direct contact volunteers are subject to student safety screening prior to their engagement by TKS and must:

- Hold and provide TKS with evidence of a current valid WWCC clearance status (or similar check).
- Provide TKS with proof of their personal identity (at least 100 points of identification is required).
- Have a current National Police Check or be willing to obtain one prior to commencement.

- Provide TKS with certified evidence of their professional or other qualifications relevant to the role.
- Detail and provide to TKS their history of student-connected work.
- View relevant student safety documentation, including the Student Safety Handbook, Student Safety Induction Presentation and TKS Parent Volunteer Guidelines, and complete the TKS Student Safety Declaration Form. Where appropriate, satisfy a reference check that addresses the person's suitability to volunteer and work with children and other students (this requirement is a matter of best practice and is particularly relevant for large-offsite events, overnight excursions and camps).
- Comply with any additional screening requirements implemented by TKS (i.e. in the Homestay Information Handbook).

Indirect contact volunteers

An indirect contact volunteer means a person who is involved in providing support and services at TKS whilst not directly assisting a child or specific group of students. For example, this would include a person assisting with school administration functions.

All indirect contact volunteers are subject to student safety screening prior to their engagement by TKS and must:

- Hold and provide TKS with evidence of a current valid WWCC clearance status.
- Provide TKS with proof of their personal identity (at least 100 points of identification is required).

Third party contractors

Third party contractor(s) include maintenance and building personnel, consultants, tutors, support providers, VET providers, sports coaches and cleaners who either attend TKS, or other activities and events associated with TKS, for the purpose of performing contracted services or provide TKS with access to their facilities

Where a third-party contractor could have direct or indirect contact with students during the ordinary course of providing their services to TKS, they will be subjected to the equivalent screening processes for volunteers. Child-facing contractors must present their WWCC number at Reception when signing in using the VPass digital sign-in. Records of this are kept by the School.

Interviews

Applicants are typically interviewed by at least two staff members and at least one interview is face to face (where possible).

Personal relationships do not influence TKS's recruitment and selection process because recruitment and selection decisions are based on merit and not personal relationships.

The purpose of an interview is to provide and obtain information that will assist in making a decision about an applicant's suitability for the role.

Interview questions will include those from the following categories:

- Technical – used to determine the skills and qualifications of the applicant.
- Behavioural – past behaviour indicates future behaviour.
- Cultural – to assess a fit with TKS’s vision, ethos and values of *Achievement, Care, Empathy, Resilience, Responsibility and Respect*.

Interview questions also relate to the applicant’s work history, skills and attributes as well as addressing selection criteria for the role. Interview questions are not discriminatory.

During the interview, applicants are provided information about TKS, particularly, TKS’s focus on student safety and wellbeing.

The recruitment panel will make detailed notes of the interview.

Suitable applicants may be invited to attend a second interview with a senior member of staff. Interviewed applicants who are not subsequently selected are notified.

7 Background Checks and Required Certifications

All appointments (including those involving child-connected work) will be conditional on the presentation of:

- Evidence that all screening checks required have been satisfied (refer above), which depending on the position, may include:
 - Evidence of current registration with the VIT.
 - A satisfactory National Police Check.
 - A current WWCC.
 - Proof of personal identity (at least 100 points of identification).
- Proof of any professional or other qualifications (including if applicable, evidence that a teacher is suitably qualified and experienced to deliver a junior school/ senior school course);
- Evidence of the person's history of work involving children and young people.
- Completion of psychometric testing and/or technical skills testing, which TKS may require candidates to undertake from time to time.

TKS will verify and keep appropriate records regarding the above information.

8 Reference Checking

TKS will require at least two references from former and current employers of the applicant. TKS’s reference checking process also involves enquiries about the applicant’s suitability for working with students, or student connected work, including in a school specific context.

Permission from the applicant to contact any nominated referees and to perform a full employment background check, should they be the preferred candidate, must be obtained during the interview.

All notes taken during the recruitment process (including the interview and reference check) will be placed on the staff member’s file if the applicant is successful.

If a reference cannot be undertaken until the preferred applicant resigns from the current position, any employment offer will be made subject to the satisfactory completion of reference checks.

9 Entitlement to Work in Australia

All applicants must provide valid documentation of their right to work in Australia. It is the applicant's responsibility to advise TKS of visa expiry dates.

An applicant's citizenship or other immigration/visa status will be considered only as required by applicable laws and regulations for employment.

10 Pre-Employment Medical Requirements

Pre-employment health declarations

Legislation requires that TKS must:

- Ask the applicant, in writing, to disclose any pre-existing injury or illness that could be affected by the nature of the proposed duties.
- Explain, in writing, to the applicant that a failure to disclose, or a misleading disclosure concerning pre-existing injuries or illnesses may result in a loss of entitlement to workers compensation, should the injury recur.

To meet this requirement, new staff (which include ex-employees returning to TKS) are required to complete a pre-employment health declaration prior to commencing employment.

Pre-employment medical assessments

TKS may require an applicant to undergo a pre-employment medical assessment.

This will occur if TKS forms the view that it is prudent to independently confirm a prospective recruit's medical fitness to perform the duties that relate to the role that the prospective staff member is applying for. Such an assessment will be conducted by a registered medical practitioner of TKS's choice.

If the registered medical practitioner is unable to recommend employment of the applicant, TKS may withdraw the offer of employment (if the offer has already been made).

11 Ensuring Student Safety Post Recruitment (Section 155)

Regular screening practices and obligations to disclose

TKS will review the currency of VIT registration and WWCC clearances (or similar checks) annually (or more frequently as required).

All staff are required to immediately notify TKS if their VIT registration or WWCC clearance (or similar check), is suspended, cancelled or otherwise under investigation.

All staff are prohibited from engaging in student-connected work in the absence of a valid VIT registration or WWCC clearance (or similar check).

Induction

TKS requires all staff to undergo appropriate induction upon commencement at TKS, including in relation to the student safety framework (including the Student Safety and Wellbeing Policy, Student Safety and Wellbeing - Staff Code of Conduct, Student Safety and Wellbeing – Raising and Responding to Student Concerns Policy and Student Safety and Wellbeing Policy - ELC).

Prior to commencing at TKS, all volunteers, Board members and third-party contractors must undergo appropriate induction, and be provided with TKS's key student safety policies and related policies and procedures. The induction process for incoming Board members must also address the requirement for TKS's governing body to:

- ensure that all people working at TKS are suited to do so and reflect TKS's student safety and wellbeing values in practice.
- ensure that recruitment advertisements for staff have a clear statement that sets out:
 - the jobs requirements, duties and responsibilities regarding student safety and wellbeing; and
 - the job occupant's essential or relevant qualifications, experience and attributes in relation to the student safety and wellbeing.
- otherwise comply with its obligations relating to suitable staff and volunteers under clause 10 of *Ministerial Order No. 1359*.

Once staff, Board members, volunteers, labour hire workers, secondees or contractors have completed TKS's induction program (which will be relevant to the role in question), this will be recorded by TKS and stored for record keeping purposes.

Supervision, monitoring and assessment

All staff

TKS requires that staff act professionally, and in a way that embodies TKS's commitment to student safety.

TKS's student safety framework is available on TKS's staff portal, and includes the Student Safety and Wellbeing Policy, Student Safety and Wellbeing - Staff Code of Conduct, Student Safety and Wellbeing – Raising and Responding to Concerns Policy, and the Student Safety and Wellbeing Policy - ELC.

Staff will otherwise be subject to regular supervision, monitoring, performance reviews and assessment, to ensure their ongoing suitability for student-connected work. This will be managed by the Executive Team, and will include:

- Effective use of probation periods and annual performance reviews for staff (or where applicable, site or accommodation visits), which shall include an assessment of a staff member's continuing suitability for student-connected work.
- Ensuring staff and volunteers receive training on implementing the Student Safety and Protection Policy, building culturally safe environments for children and young people, recognising indicators of harm (including that caused by other children and young people) and responding effectively to student safety issues and concerns, and

supporting colleagues who disclose harm. Ensuring staff (as defined earlier in this policy) receive training on TKS's record keeping, information sharing and reporting obligations.

- Ensuring staff and, where appropriate, volunteers receive ongoing student safety training that is tailored to the relevant needs of staff and volunteers, and factors in the complexity of child-connected work undertaken at TKS (including with regard to TKS's international students).
- Ensuring staff are aware of, understand and respect student's individual needs and differences (including Aboriginal and Torres Strait Islander students, international students, students from culturally and linguistically diverse backgrounds, students with a disability, LGBTIQ+ students and students who are unable to live at home).
- Monitoring staff to ensure their behaviour towards students is appropriate and to ensure compliance with TKS's student safety policies.
- Appropriate levels of supervision for all staff, and in particular staff and volunteers who have direct contact with students.
- Acting on concerns which are raised in accordance with the Student Safety and Wellbeing Policy, Student Safety and Wellbeing – Staff Code of Conduct, Student Safety and Wellbeing– Raising and Responding to Student Safety Concerns Policy and Student Safety and Wellbeing Policy - ELC.
- Taking appropriate disciplinary action where a staff member is found to have acted contrary to TKS's student safety framework.

In addition to appropriate training at induction, periodic refresher training will also occur for staff and relevant volunteers to ensure ongoing understanding of their legal and professional obligations. The purpose of the training is to equip staff and volunteers with the knowledge, skills and awareness required to keep students safe and otherwise provide information that is relevant with regard to the nature and responsibilities of the staff or volunteer's role. This includes annual Mandatory Reporting (MARAM) Training. This includes supervision, monitoring and assessment to ensure that teaching staff have the relevant skills, qualifications and experience to teach at TKS.

At least annually, TKS will ensure that appropriate guidance and training is provided to Board members and staff about:

- Individual and collective obligations and responsibilities for managing the risk of child abuse and reportable conduct.
- Child abuse and reportable conduct risks in TKS environment.
- TKS's current student safety framework.

Relevant information and details of modules completed by each member of staff is recorded and stored for record keeping purposes.

The Principal will be responsible for keeping the Board informed (via the Principal's report or otherwise, periodic updates) regarding any matters which relate to a staff member's continuing suitability for student-connected work, or which otherwise concern the appropriateness of TKS's arrangements for ensuring that staff engaged in student-connected work perform appropriately in relation to student safety (and in particular student safety).

TKS's International Student Program

In addition to the supervision, monitoring and assessment requirements for all staff (as set out above), further training requirements apply to the International Student Co-ordinator and those support staff involved in TKS's International Student Program.

Such staff will complete targeted training which covers:

- The Child Safe Standards.
- TKS's policies and procedures for managing emergency situations and critical incidents.
- Policies and procedures for verifying that an international student's accommodation is appropriate to the student's age and needs.
- Relevant requirements in the Education Services for Overseas Students Act 2000 (Cth) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 – as amended or replaced from time to time.
- The VRQA Guidelines for the Enrolment of Overseas Students Aged Under 18 Years.
- The VRQA Minimum Standards and any other VRQA guidelines that are issued from time to time.

Specific training for relevant staff involved in TKS's International Program is provided through a combination of methods, which includes but is not limited to online modules, internal training and external training (through providers such as the VRQA, ISANA (International Student Advisers Network of Australia), and Vision International).

12 Privacy and Confidentiality

Privacy legislation impacts the entire recruitment process, as applicants may seek to access any information relating to their application. This may include any notes made on their resume, any notes made during their interview and any information recorded after speaking with their referees. All information obtained about an applicant as part of the recruitment process is confidential and must not be distributed without authority of TKS. Consent to a full employment background check should be obtained from the prospective staff member during the interview.

13 Consequences of a Breach of this Policy

TKS emphasises the need to comply with the requirements of this policy. Any staff found to be in breach of the requirements of this policy may be subject to disciplinary action, up to and including termination of employment.

To properly implement this policy, all TKS's staff must ensure that they will abide by this policy and assist TKS in the implementation of this policy.

14 Communication and Implementation

This policy is available to staff as part of TKS's and the Board's internal policies and procedures. Aspects of (and updates to) TKS's student safety framework, including this policy will be addressed in TKS's professional development updates, training programs, bulletins and newsletters.

To properly implement this policy:

- It will be reviewed and endorsed every two years, or more frequently if required.
- All staff, volunteers, labour hire workers, secondees and contractors must ensure that they understand and abide by this policy and assist TKS in implementing this policy.

Student Safety and Wellbeing – Record Retention Policy

Last Review: 24 th June 2025	Constructed / Reviewed by: The Knox School, on advice from Russell Kennedy Lawyers and with input from the School Community.
Next Review: 24 th June 2027 (and every two years thereafter in accordance with the School's review cycle, or more frequently as required)	Approval Required: Board
Document Date: 24 th June 2025	Board Sign Off Date: 24 th June 2025

1 Statement of Context and Purpose

The Knox School (**the School**) is committed to protecting its students from all aspects of harm, and has established strategies, practices, policies and procedures to uphold this public commitment.

The School is committed to ensuring that it adopts recognised best practices with respect to the School's Records, particularly those Records that:

- are required to meet the prescribed minimum standards for the registration of schools;
- demonstrate the School's commitment to the care, safety and welfare of students;
- support the School's compliance with the Child Safe Standards; and
- are otherwise required to be kept at law.

This policy specifically responds to the Child Safe Standards contained in Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and Boarding Premises by adopting the central principles and requirements of the Public Record Office Victoria (**PROV**) Recordkeeping Standards, in particular clauses 6.2(f)-(h), with respect to Records relating to the care, safety and welfare of students.

This policy otherwise voluntarily adopts the PROV Recordkeeping Standards with respect to other Records.

This policy:

- defines the Records covered by this policy;
- sets out the retention period for the Records;
- sets out the manner in which the School meets the PROV Recordkeeping Standards, and in doing so details the Recordkeeping processes that the School has in place to demonstrate that the care, safety and welfare of students is embedded in the School's leadership, governance and culture.

2 Application

This policy applies to all Board members, employees, volunteers, contractors labour hire workers, secondees and other authorised personnel required to perform functions on the School's premises, or at School-organised activities and events. Collectively, these individuals are referred to as 'staff'.

This policy relates to Permanent Records and Temporary Records

3 Related Policies and Documents

3.1 Legislation

- *Crimes Act 1958* (Vic)
- *Corporations Act 2001* (Cth)
- *Education and Training Reform Act 2006* (Vic)
- *Education and Training Reform Regulations 2017* (Vic)
- *Fair Work Act 2009* (Cth)
- Ministerial Order No. 1359
- PROV Record Keeping Standards (see Glossary)

3.2 Policies

- Student Safety and Wellbeing Policy
- Student Safety and Wellbeing Policy - ELC
- Student Safety and Wellbeing – Staff Code of Conduct
- Student Safety and Wellbeing – Raising and Responding to Concerns Policy
- Student Safety and Wellbeing – Recruitment and Employment Policy

3.3 Documents

Procedures for Responding to or Making a Request for Information under the Child Information Sharing Scheme

3.4 Schedules to this Policy

- Schedule 1: Record Retention and Disposal
- Schedule 2: Guidelines

4 Retention Periods

Permanent Records are to be retained permanently. Temporary Records are to be retained for the greater of:

- the period set out in Schedule 1;
- the period required under the Laws, or
- where no such period is prescribed, seven years.

5 Policy, Planning, Governance and Accountability with Respect to Records

At all times, the governance of Records will be, to the extent relevant, informed by the PROV Pros 19/03 *Strategic Management Standard*.

6 Access to Records

At all times Records must be effectively managed to ensure that they can be retrieved and used for the period of time that they are required to be retained. Accordingly, Records must be described and managed so that they can be identified, retrieved and used for authorised purposes.

7 Creation, Preservation and Control of Records

In satisfaction of PROV Pros 19/05 *Create, Capture and Control Standard*:

- full and accurate Records must be systematically created and captured;
- Records must be preserved for the period of time that they must be retained including, but not limited to, ensuring that Records are survivable and readable for the required life of the Record, are sufficiently descriptive, are migratable if required, meet minimum metadata requirements and can be saved as Victorian Electronics Records Strategy (VERS) encapsulated objects;
- Records must be controlled in a manner that ensures Records are protected from unauthorised activity including that Records may only be accessed by staff with requisite written authority granted in accordance with approved delegations of the School; and
- the School will maintain a digitisation plan and digitised Records must be created in accordance with the School's digitisation plan, and original source documents cannot be destroyed after imaging unless the requirements of the PROV Recordkeeping Standards have been met.

8 Disposal of Records

In satisfaction of PROV Pros 10/13 *Disposal*:

- disposal and destruction of Records must be lawful; and
- records are only to be disposed in accordance with the principles set out in *PROV Pros 10/13 Disposal*, including when destroyed by authorised destruction protocols or through an authorised custody transfer to an approved place of deposit.

For the avoidance of doubt, Records (both Permanent Records and Temporary Records) may hold evidentiary value at law. The destruction or prevention of documents from being used as evidence in a legal proceeding is an offence under legislation including, but not limited to, the *Crimes Act 1958* (Vic).

9 Management and Storage of Records

In satisfaction of PROV Pros 19/04 *Operational Management Standard* and PROV Pros 20/02 *Storage Standard*:

Records must be managed and stored in accordance with the principles as they relate to the School set out in *PROV Pros 19/04 Operational Management Standard* and *PROV Pros 20/02 Storage Standard* and in accordance with the following specifications, to the extent applicable;

- (a) PROV Pros 20/02 S1: Apress
- (b) PROV Pros 20/02 S2: Specification for place appointed to store and manage state archives; and
- (c) PROV Pros 20/02 S3: Class B Place of Deposit Requirements.

10 Glossary

Term	Means
Permanent Record	A permanent record is a record that the School will retain forever. The School considers Permanent Records to be: 1. Records that are legislatively determined to be held as a Permanent Record. 2. Governance and operational records including: (a) governance documents, relating to the establishment and closure of the School, all strategic plans and formal planning documents and all Records relating to corporate identity; (b) documents relating to the structure, membership and operation of the School Board, Council, any Committees of the Board, Executive Management Team and Student Council and all records ordinarily related to the company secretarial function of the School; (c) all records relating to the acquisition and disposal of land or buildings including acquisition through purchase, donation, bequest or other forms of acquisition; (d) records relating to the accreditation, licensing and quality accreditation of the School including correspondences with its regulators and other government bodies including a master record of all accredited or approved courses, programs modules and units provided for staff of the School or of other Schools; (e) all records that summarises the School's financial position that are audited or are used for other reporting including but not limited to asset registers, annual financial statements, statutory financial reports and accompanying notes, building funds, trust funds, loans (made and received), and bequests; (f) records of delegation or formal exercise of power; (g) records evidencing the creation or registration of the intellectual property of the School; (h) a register of all contracts and agreements entered into by the School; (i) records of the development and review of all School policies and procedures; (j) records relating to major litigation especially those litigious matters that are in the public interest or are prone to controversy; and (k) records of insurance taken out by the School including property, contents, vehicles, public liability, professional indemnity and workers compensation; 3. Student records including:

	(a) records relating to students including but not limited to student enrolment records, performance records, attendance records; records relating to the development of and student participation in any student health and welfare records, and all incident and accident management Records; (b) all records pertaining to child protection, student safety and wellbeing, child abuse, including allegations investigated and not proven, all records of investigations, all records of determination and/or finding, and all records pertaining to the police or an enforcement body; and (c) all records of complaint made about the School, or about a teacher, student counsellors, or another student by a student; 4. Personnel Records including: (a) employment records of teachers and student counsellors and support workers including volunteers including name of individual, date of birth, date of appointment, date of separation, rates of salary and allowances, individual employment agreement, position titles and dates positions held, teach and non teacher practising registration, security check completion, evidence of professional learning, grievances, and disciplinary matters; 5. Recordkeeping records (a) record of the controls and actions taken with respect to recordkeeping systems and archival collections; 6. Other (a) any other record determined to be a Permanent Record by resolution of the School Board.
PROV Record Keeping Standards	1. Access Standard Pros 19/06 https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1906-access-standard 2. Creation, Capture and Control Standard Pros 19/05 https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1905-create-capture-and-control-standard 3. Specification Pros 19/05 S1: Digitisation https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1905-s1-digitisation-specification 4. Specification Pros 19/05 S2: Minimum Metadata Requirements https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1905-s2-minimum-metadata-requirements-specification 5. Specification Pros 19/05 S3: Long Term Sustainable Formats https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1905-s3-long-term-sustainable-formats-specification 6. Specification Pros 19/05 S4: Constructing VEO's https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1905-s4-constructing-veos-specification

	7. Specification Pros 19/05 S5: Adding metadata packages to VEO's https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1905-s5-adding-metadata-packages-veos 8. Standard Pros 10/13 Disposal https://prov.vic.gov.au/recordkeeping-government/document-library/pros-2204-disposal-standard 9. Operational Management Standard Pros 19/04 https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1904-operational-management-standard 10. Storage Standard Pros 20/02 https://prov.vic.gov.au/recordkeeping-government/document-library/pros-2002-storage-standard 11. Specification Pros 20/02 S1: Apress https://prov.vic.gov.au/recordkeeping-government/document-library/pros2002s1-apress-specification 12. Specification for place appointed to store and manage state archives Pros 20/02 S2 https://prov.vic.gov.au/recordkeeping-government/document-library/pros-2002-s2-places-appointed-manage-state-archives 13. Specification Pros 20/02 S3: Class B Place of Deposit Requirements https://prov.vic.gov.au/recordkeeping-government/document-library/pros-2002-s3-class-b-place-deposit-requirements 14. Strategic Management Standard Pros 19/03 https://prov.vic.gov.au/recordkeeping-government/document-library/pros-1903-strategic-management-standard
Record	A document or other source of information that has been collated, recorded or stored in written or electronic form. Examples of Records include, but are not limited to, student records, employment records, accounting and financial documents, contracts, legal documents, litigation, payroll documents, taxation documents, property documents, health and safety documents. A record must be either a Permanent Record or a Temporary Record.
Temporary Records	A temporary Record is a record that the School will retain temporarily. The School considers temporary Records to be: (a) Records that are legislatively determined to be held as a temporary record; (b) A Record that is not a Permanent Record.

11 Additional Resources

For additional guidance, staff may refer to the Records Retention & Disposal Schedule for Non-Government Schools 2nd Edition published by the Australian Society of Archivists, as amended.

12 Communication and Implementation

12.1 Communication

This policy is made publicly available on the School's website.

This policy is available to staff as part of the School's and the Board's internal policies and procedures. Aspects of (and updates to) the School's student safety and wellbeing framework, including this policy will be addressed in the School's professional development updates, training programs, bulletins and newsletters.

12.2 At Board / Principal Level

To properly implement this policy:

- (a) The Board and Principal will review this policy and the School's student safety and wellbeing practices at least every two years (or more frequently after a significant Record-related incident) and implement improvements where applicable.
- (b) Families and the school community will be afforded the opportunity to contribute to the review and development of the School's student safety and wellbeing policies and practises (including this policy).
- (c) Periodic training and refresher sessions on this policy are provided to all staff.
- (d) The Principal is responsible for monitoring staff compliance with this policy. All staff must ensure that they abide by this policy and assist the School implementing this policy.

12.3 At Other Levels

To properly implement this policy, all staff must ensure that they will abide by this policy and assist the School in the implementation of this policy.

Schedule 1: Record Retention and Disposal

Document Category	Document Sub-category	Guidelines Re Retention Period (Note: documents must not be destroyed if the School is on notice of a potential claim for which the working documents may be relevant)
Agreements, administrative documents, and general documents	Agreements and memoranda	7 years after their conclusion
	Any agreement reduced to a deed	12 years (and indefinitely in the case of trust funds, deeds of gift and/or bequests under wills)
	General School administrative documents	2 years after administrative use concluded
	Working documents (drafts, duplicates, administrative emails)	Destroyed once use is no longer required
	Any other agreements, administrative documents and general documents not falling into the above sub-categories	7 years
Board documents	Notices; papers; minutes and correspondence	7 years
Student safety and wellbeing and duty of care policies, procedures and staff training records		Ideally, indefinitely with version control; otherwise, at least 25 years after the date the relevant version of the policy ceased to be in force (unless there is a record of a student safety and wellbeing or duty of care allegation, in which case relevant versions should be kept indefinitely).
Company documents	ASIC records; AGM/SGM notices, papers and minutes, membership or share registers	Indefinitely where practicable, and 7 years in the minimum

School policies and procedures (which do not relate to student safety and wellbeing or duty of care policies) generally		At least 7 years after the date of each version
Staff records	Registers of staff service periods	Indefinitely
	Other	7 years after the staff member's employment ends (unless there is a record of a student safety and wellbeing or duty of care allegation against the staff member, in which case relevant records should be kept indefinitely)
Student Records	Health information (including counselling and psychologist session records) and Nationally Consistent Collection of Data on School Students with Disability (NCCD) information	At least until the student reaches 25 years of age (unless there is a record of a student safety and wellbeing or duty of care allegation, in which case relevant records should be kept indefinitely)
	Other / student records generally	50 years after the student's date of birth (unless there is a record of a student safety and wellbeing or duty of care allegation, in which case relevant records should be kept indefinitely)
Rosters and timetables		7 years (unless there is a critical incident, in which case the relevant rosters and timetables should be stored on the relevant staff, student or critical incident record)



Schedule 2: Guidelines

1 Where We Keep Records Related to Student Safety and Wellbeing

The Principal is responsible for keeping all records relating to student safety and wellbeing incidents or concerns, including records of allegations, investigations and findings made, up to date and secure.

Hardcopy records relating to actual or alleged child abuse and reportable conduct are stored in a fireproof, locked safe in an onsite secure room. Softcopy records are stored on the School's Record of Communication (ROC) system.

Where a student safety and wellbeing incident or concern relates to an allegation against a staff member (including about breaches of the *Student Safety Staff Code of Conduct*), records may also be maintained as part of Reportable Conduct records and People and Culture Management records.

2 Documenting the Student Safety and Wellbeing Incident or Concern and the School's Response

Documenting observations and communications about all student safety and wellbeing incidents or concerns, including those that do not meet the relevant threshold for external reporting, ensures that:

- all information about individual students can be taken into account should future student safety and wellbeing incidents or concerns arise,
- any patterns that might arise from student safety and wellbeing incidents or concerns can inform reviews of the School's student safety and wellbeing strategies.

Therefore, all observations of and verbal and written communications about student safety and wellbeing incidents or concerns (including notes of observations, student disclosures, meetings and telephone calls) must be properly documented, regardless of whether or not the student safety and wellbeing incident or concern meets the relevant thresholds for external reporting. The records should include dates and times and enough detail to record key observations or conversations, especially those relating to the student's disclosure.

In addition, where a staff member:

- believes on reasonable grounds that a student is in need of protection as a result of physical or sexual abuse, such that a Mandatory Report to Child Protection has been or will be made,
- believes on reasonable grounds that a student is in need of protection for any reason or is in need of therapeutic treatment for sexually abusive behaviour, such that a Non-Mandatory Report to Child Protection has been or will be made,
- has significant concerns for the wellbeing of a student, such that a Non-Mandatory Report to Child Protection has been or will be made,
- believes on reasonable grounds that a sexual offence has been committed against a child, or that student sexual offending has occurred, such that a Report to Police has been or will be made,

- believes that other circumstances exist such that a Non-Mandatory Report to Police is required, they must record written and dated notes of their observations and concerns to assist in reporting the concerns to Child Protection or Police.

3 How to Document the Student Safety and Wellbeing Incident or Concern

The School requires a Student Safety ROC to be completed to record all student safety and wellbeing incidents and concerns. Student Safety ROC which must be completed by a Student Safety Officer.

Staff members should document all student safety and wellbeing incidents and concerns, including observations, beliefs, suspicions, disclosures or allegations of student abuse or other harm. This form must be used regardless of whether the alleged perpetrator may be a parent/carer, other student, staff member, or any other person and must be attached to the Student Safety ROC.

For volunteers, contractors labour hire workers and secondees, a Student Safety Officer can complete a form on their behalf.

Staff members should only record what information is observed or offered during the incident, disclosure or allegation and then be sure to report the matter in accordance with the *Student Safety and Wellbeing – Responding to Concerns Policy*.

The ‘Process of Review’ section in the form must be completed between four to six weeks after an incident, suspicion or disclosure of abuse, in conjunction with the Principal, a Student Safety Officer or, if the incident or concern involves the Principal, the Chair of the School Board.

The Student Safety ROC must be updated by a Student Safety Officer as Critical Actions are completed. All Critical Actions listed on the form must be completed for the incident to be closed.

Any other notes and records obtained or made by staff members regarding student safety or wellbeing incidents or concerns should also be given to the Principal or a Student Safety Officer and attached to the Student Safety ROC. Notes and records may include:

- handwritten notes taken during a disclosure by a student,
- copies of any written reports made to the Police or external bodies about the matter,
- if the allegation includes claims of inappropriate online activity, any digital copies of correspondence between the student and the person or staff member who is the subject of the allegation.

4 Working with Children Check Documentation

It is the responsibility of the Head of People & Culture (Human Resources) to verify and monitor the WWCC clearance status of all staff members.

The status of volunteer, contractor labour hire workers, secondees WWCC clearances is monitored by the Schools Student Information System platform, a third-party platform subscribed to by the School.

The following information for all staff members who are required to hold a WWCC clearance is recorded electronically in a consolidated register, which is updated regularly:

- first name
- family name
- WWCC Application Receipt Number

- WWCC Card Number
- WWCC clearance expiry date
- notices sent by Working with Children Check Victoria
- notices provided by the worker.

The School also maintains records (electronic or hard copy format) of relevant volunteers who are required to hold a WWCC clearance including:

- first name
- family name
- WWCC Application Receipt Number
- WWCC Card Number
- WWCC clearance expiry date
- notices sent by Working with Children Check Victoria.

The School maintains the WWCC registers and other WWCC documentation indefinitely

5 Records of Teacher Registration and VIT Notifications

The School maintains a register of the registration status of all teachers at the School. This register includes:

- full name
- registration number
- the VIT category of registration
- the expiry and renewal date
- a record of the date and type of any notifications made to the Victorian Institute of Teaching (**VIT**) by the School about a registered teacher.

It is the responsibility of the Head of People & Culture (Human Resources) to ensure that the register of teachers is maintained up to date with relevant notifications

6 Reportable Conduct Records

When a reportable allegation is made, the School must document certain information throughout the Reportable Conduct process:

- the allegation
- the School's initial response to the person making the allegation, the alleged victim(s) and the employee who is the subject of the allegation
- any communication with the Police or other authorities
- the Investigation Plan, detailing how the investigation is to be carried out
- the Stage One risk assessment conducted by the Principal
- all interviews including details of questions and responses. Details should also include the location of the interview, who was present and start and finish times

- any decision made, both during and at the conclusion of the investigation, including the person making the decision's rationale, the position and name of the person making the decision and the date that the decision was made
- any personal contact, discussions or emails with anyone about the matter (including dates, details of discussions, questions, advice, outcomes, the name of the person making the contact, details of their position and where appropriate, the reason for the contact)
- the Investigation Report
- the final report for the Social Services Regulator (SSR) that sets out details of the findings in relation to each allegation and the reasons for the findings, the final risk assessment which includes any final decision about the employee and the factors that have been considered and any subsequent action that is to be or has been taken.

All records created in accordance with the Reportable Conduct Scheme, including all allegations, outcomes of internal investigations and decisions to make or not make a report to the SSR are maintained by the Principal.

The School keeps these records in a file that is separate to the employee's personnel file and retains them indefinitely.

7 Record Keeping About Information Sharing

The School must record the following information when sharing, or responding to a request to share, information about the safety, welfare and wellbeing of a student (Information):

- who requested the Information and the date of the request (if any)
- who shared the Information
- why the Information was shared (e.g. whether it was shared pursuant to a statutory or other legal obligation)
- who the Information was shared with
- whether informed consent was sought from, and if so whether it was provided by, the student and/or their parent/carer
- the approval of the Principal's EA to share the Information
- the date that the Information was shared.

Whenever a request for Information is made to the School or the School otherwise shares Information, the person managing the Information sharing request or disclosure must record the above information.

Completed forms must be attached to the Information Sharing Scheme ROC which must be completed by a Student Safety Officer.

8 Other Student Safety People and Culture Management Records

It is the responsibility of the Head of People & Culture (Human Resources) to record and maintain (electronically or hard copy format) all records relating to student safe human resources management, including records in relation to:

- recruitment

- screening and suitability assessment
- supervision, performance monitoring and development
- personnel files.

Through the School's Staff Learning System, the School creates and maintains electronic records of all student safety and wellbeing training completed by staff members.

The School maintains these records indefinitely.

9 Recording Other Student Safety and Wellbeing Actions

Section 91 of the *Wrongs Act 1958* (Vic) (**Wrongs Act**) imposes a duty of care on the School, as a child-related organisation, schools to take reasonable precautions to:

- prevent the physical or sexual abuse of a student under its care, supervision or authority;
- by an individual associated with the School.

If a victim of physical or sexual abuse alleged to have occurred at the School or to have involved staff brings a negligence claim against the School, a court will presume that the School breached its duty of care unless the School can prove that it took reasonable precautions to prevent the abuse.

Whether or not the School took reasonable precautions will be assessed by the court in accordance with considerations set out in the *Wrongs Act* and case law.

It is critical that the School maintains accurate and comprehensive records not only of student safety and wellbeing incidents and concerns involving staff, but also of:

- actions taken in response (including systemic reviews and resulting improvements);
- biennial reviews of and improvements to the School's student safety and wellbeing policies, procedures, work systems and strategies, as these could be required as evidence in relation to possible future negligence claims against the School for damages in respect of student physical or sexual abuse.

The following records may assist in demonstrating reasonable precautions taken by the School to prevent the physical or sexual abuse of its students:

- (a) records that document actions taken by the School in response to specific student safety and wellbeing incidents and concerns (refer to How to Document the Student Safety and Wellbeing Incident or Concern and the *Student Safety and Wellbeing – Responding to Concerns Policy*, above);
- (b) records that document the implementation of the School's student safety and wellbeing risk management strategies;
- (c) records that document reviews and improvements of our student safety policies, procedures, work practices and systems;
- (d) records that document the student safety and wellbeing training provided to and completed by staff members.