



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.