

CHILD SAFE POLICY

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1. INTRODUCTION

1.1 Commitment to the Safety of Children and Young People

We are committed to providing a safe environment to all children and young people. Our policy complies with all relevant state-based legislation regarding Child Safety and aligns with the National Principles for Child Safe Organisations.

We value and respect children and young people and welcome all Aboriginal and Torres Strait Islander boys, including those who have diverse needs. Bullying and harassment won't be tolerated.

This policy, along with the Foundation's Code of Conduct and Statement of Commitment to Child Safety expresses in broad terms the ethical and moral standards and behaviours expected of all employees, contractors and volunteers of the Clontarf Foundation.

1.2 Scope

This policy applies to all employees, volunteers and board members referred to throughout the policy collectively as employees.

While this policy refers to children and young people who are primarily considered to be under 18 years of age, the Foundation expects the same standards of behaviour and professional boundaries to apply in interactions with students aged 18 years and over.

All employees are required to agree in writing to accept and act in accordance with this policy.

2. DEFINITIONS

Term	Definition
Child Abuse	Occurs when a child has been subjected to physical, sexual or emotional abuse and/or neglect which has resulted or is likely to result in significant harm to the child's wellbeing. It may involve ongoing, repeated or persistent abuse, or arise from a single incident.
Psychological/emotional abuse	This includes bullying, threatening and abusive language, intimidation, shaming and name calling, ignoring and isolating a child and exposure to domestic and family violence.
Physical abuse	This includes physical punishment, such as pushing, shoving, punching, slapping and kicking, resulting in injury, burns, choking or bruising.
Sexual abuse	This includes the sexual touching of a child, grooming and production, distribution or possession of child abuse material.
Grooming	This is a process where a person manipulates a child or group of children and sometimes those looking after them, including parents, carers, teachers and leaders. They do this to establish a position of 'trust' so they can then later sexually abuse the child.
Misconduct	This is inappropriate behaviour that may not be as severe as abuse but could indicate that abuse is occurring and would often be in breach of an organisation's Child Safe Code of Conduct. This could include showing a child something inappropriate on a phone, having inappropriate conversations with a child or an adult sitting with a child on their lap.

Term	Definition
Lack of appropriate care	This includes not providing adequate and proper supervision, nourishment, clothing, shelter, education or medical care.
Reasonable grounds	A belief or suspicion based on sufficient and credible information that would lead a reasonable person to conclude that a particular fact is true.
Alleged perpetrator	Someone who is accused of committing a crime or wrongdoing, but whose guilt has not been proven.
Clontarf Foundation Incident Report Form	https://intranet.clontarf.org.au/incident-report-form/

3. RESPONSIBILITIES

3.1 Responsibilities of General Manager, Zone Manager & Regional Manager

It is the responsibility of General Manager, Zone Managers and Regional Managers to:

- Oversee the implementation and compliance of this Policy.
- Ensure that all employees understand the Foundation's Policy and their roles and responsibilities in relation to this.
- Ensure all employees are aware of the relevant state/ territory's Education Department policies and procedures and relevant state legislation that apply to Foundation employees.

3.2 Responsibilities of Employees

It is the responsibility of **all** employees to:

- Notify the relevant Regional Manager, Zone Manager or General Manager of any breach of this policy as soon as practicable after becoming aware of the breach.
- Comply with all reporting obligations as determined by relevant state/ territory's legislation or education department procedures.
- Report any allegations of child harm or abuse and meeting any and all external reporting obligations.
- Uphold the Foundations commitment to child safety.
- Actively participate and provide feedback on all required training on Child Safety related policies, procedures.

From time to time, employees will interact with other Host School students, including females. These students are not Clontarf Academy Members, and any such interactions must be appropriate, respectful and consistent with the Foundation's Code of Conduct. Interactions must not involve programme delivery, entry into the Academy Room, or participation in Clontarf activities and events.

All employees must not:

- Develop any 'special relationships' with children and young people that could be seen as favouritism, such as, but not limited to; offering of gifts, special treatment, social media contact.
- Discriminate against any child or young person, because of age, religion, vulnerability or sexuality.

4. COMMUNICATION

This child safe policy and related documents are available to children, young people, their families and guardians on our website or on request. These documents are also provided to all employees as part of their induction following recruitment.

We encourage and respect the views of children and young people and involve them in decision making as appropriate. We provide clear, age-appropriate explanations to children and young people including their right to safety, their right to be listened to, and that they can provide feedback or make a complaint if they have a concern to any employee or ask their parent/ guardian to do this on their behalf. We will listen to, and act upon complaints or concerns that a child or young person raises with us.

5. CHILD SAFE OPERATIONS

5.1 Recruitment Processes

The Foundation approaches recruitment with a consistent and measured process including behavioural based interviewing and a due diligence process. This process is designed to understand the character of the candidate, along with their skills and abilities relevant to the role they have applied for and to identify the most suitable candidates to work with children and young people.

Prior to commencement employment with the Foundation, all employees are required to complete the following screenings:

- Australian Federal Police National Police Clearance.
- Working with Children Check pertinent to the State/ Territory in which they live/ will be working.
- Education Department Screening pertinent to the State/ Territory in which they live/ will be working.

5.2 Ongoing Employment

It is a condition of ongoing employment that employees hold and continue to hold:

- A satisfactory Working with Children Check.
- The ability to obtain a satisfactory Australian Federal Police check.
- A Nationally Coordinated Criminal History Check (NCCHC) clearance as per the relevant state Department of Education requirements.
- A driver's licence for a car and any other driver's licences necessary for the performance of their role, such as a bus licence.
- The ability to access any site, department or school necessary for the performance of their role.
- Senior first aid certification as per the relevant state Department of Education requirements.
- Water-based certification, such as a Surf Rescue Certificate or Bronze Medallion (as applicable).

5.3 Training

All employees participate in a comprehensive three-day induction at Central Office in Perth. This program includes the Foundation's Child Safe Policy, Code of Conduct and Commitment to Child Safety.

Induction for all employees occurs over the first six months of an employee's tenure. An 'Induction Checklist' is completed and a 3- and 5-month review is conducted with the relevant Manager.

All employees must complete ongoing training to understand our Child Safe Policy, our mandatory reporting obligations, how to build a culturally safe environment and our responsibilities to create a child safe and friendly environment.

5.4 Duty of Care Obligations

The Foundation has Service Level Agreements with each State and Territory government. Under the terms of these agreements, we are bound to comply with their duty of care standards and child safety requirements. This means:

- Risk Assessments are conducted for all excursions, camps and carnivals.
- State Policy and Procedure documentation is adhered to.
- Mandatory Reporting legislation is adhered to.
- School reporting, documentation and timeframes are adhered to.

5.5 Transporting Children

Best practice is to always have two adults travelling with students. If this is not possible, a suitable arrangement must be made between the Foundation and the parents of the children.

If a student is alone with an adult in a car, the student must sit in the back seat.

Every student should be accounted for at the end of a journey.

5.6 Social Media Use and Online Communication

Foundation Employees are prohibited from 'connecting' 'following' or 'being friends' with Academy Members or host School students. Employees must never communicate privately with children online or on social media. Any necessary online communication should include the child's parent or carer in the correspondence.

5.7 Photography and Use of Images

Photos and videos of children can only be taken with the written permission of parents or carers. Parents and carers must also approve any images used on our social media channels.

It is unacceptable for employees or volunteers to take photos or videos of children, other than their own, on personal devices, or to share images without permission.

5.8 Physical contact

All physical contact with students is guided by the following principles:

- Physical contact with students should be limited, appropriate and never initiated to meet the adult's needs.
- All contact with students must be transparent, age appropriate, culturally respectful and in line with Clontarf's code of conduct and role modelling expectations.
- Employees must maintain clear and healthy boundaries in all interactions, including physical, emotional and digital communication.

Acceptable physical contact

Physical contact should be non-intrusive, brief and public, examples could include high-fives, handshakes or a pat on the back.

In limited circumstances, physical contact may be necessary to:

- Provide immediate safety assistance (eg preventing injury or supporting a student in distress).
- Administer first aid.
- Guide a student, such as redirecting during sport or movement with minimal touch.

In these cases, the reason for contact should be explained beforehand wherever possible and consent should be sought (where appropriate).

In any causes where contact was significant, or could be misinterpreted, this should be documented by submitting an incident report and emailing a relevant manager.

Unacceptable physical contact

Physical contact when alone with a student or out of view of others should be avoided.

Employees should never initiate or tolerate any contact that could be misunderstood, including hugging, lap sitting, tickling, wrestling, or any form of corporal punishment.

5.10 Relational Boundaries

Employees must not engage in overly personal relationships with students or behave in a way that creates dependence, favouritism, or confusion about roles.

Communication with students must always remain professional, including in person, via phone, or online.

One on one situations must be minimised and where unavoidable, must be managed in line with approved procedures and documented as needed.

Academy members, or other Host School Students, must never be permitted to attend or sleep at Foundation Employees or Contractors houses.

5.11 Camps and Offsite Activities

Academy employees are responsible for ensuring the following:

- Consent of the parent or guardian is always sought in writing prior to an academy member attending a camp or offsite activity.
- Academy members must be always supervised by a minimum of two employees.
- Privacy of academy members for bathing, toileting and dressing must be provided, and supervised by a employee at all times (eg. Standing at the entrance of the bathroom facility).
- Adults must not shower, change or toilet while supervising academy members in the same area.
- Phones, cameras and recording devices must not be taken into or used in the showering, changing or toileting areas while occupied by academy members.
- Academy members have the right to contact their parents, or another adult if they feel unsafe, uncomfortable or distressed while on the camp or offsite activity.

5.12 Gifts and Benefits

Clontarf Employees are not permitted to give gifts to students, unless authorised by the appropriate Regional Manager, Zone Manager or General Manager.

5.13 Alcohol, Drugs and Smoking

Clontarf Foundation takes a zero-tolerance approach to Employees possessing and/or consuming alcohol or illicit drugs or possessing drug paraphernalia while at work including while transporting academy members.

While on school premises Employees are not permitted at any time to:

- Consume or possess alcohol or illicit drugs or drug paraphernalia; or
- Smoke, including the use of electronic cigarettes.

While on camps, transporting academy members or at offsite activities Employees are not permitted to:

- Consume or possess alcohol, illicit drugs (or drug paraphernalia) or prescription medication that has the potential to impair the judgement of Employees.
- Smoke or use electronic cigarettes, in any enclosed areas, Clontarf vehicles or areas not designated for smoking.

If an Employee is utilising a designated place for smoking it must never be in the presence of academy members.

If an Employee has a suspicion of academy members in possession of or using alcohol or illicit drugs, the Employee is to report their suspicions as soon as practically possible to the host school principal and complete a Foundation Incident Report form.

If an Employee has a suspicion of academy staff in possession of or using alcohol or illicit drugs, the Employee is to report their suspicions as soon as practically possible to the Regional Manager.

5.14 Secondary Employment

Employees are not permitted to offer child minding services of Academy Members unless they know the family or carer outside the organisation. If this is the case, they must request approval for this arrangement to commence and/ or continue by reporting to the COO for prior approval.

5.15 Privacy and Confidentiality

Clontarf Foundation respects and maintains privacy and confidentiality of all relevant student and family information. Documents containing confidential information will be stored securely and with restricted access. Digital files containing confidential information will be protected electronically with restricted access. Employees must not disclose information regarding any child or young person without the written consent of the child/ young person and their parent/ guardian unless legally required to.

5.16 Illness and Injury Management of Children

All employees are required to:

- Obtain and maintain a first aid certification.
- Report injuries to the first aid officer on duty,
- Administer first aid in a safe space within lines of sight of other adults, and
- all injuries must be reported via the Clontarf Foundation incident report form located on the intranet

6 REPORTING

6.11 Mandatory Reporting

When a Clontarf Foundation employee forms a belief on reasonable grounds, during the course of work as an employee, that a child is or has been the subject of sexual abuse, physical or emotional abuse, family violence or neglect (where the host school principal is not the alleged perpetrator). The following steps must be followed:

- Report to the host school principal and submit a Clontarf Foundation Incident Report Form (available on the Foundation's Intranet)
- Document all observations, relevant information and concerns
- Provide this documentation to the principal and attach to the Clontarf Foundation Incident Report

Clontarf Foundation employees must not:

- Inform parents/caregivers that a report has been made
- Interview the child or children involved
- Investigate the concern
- Collect photographic or video evidence

6.12 Reporting of Allegations of Abuse Perpetrated by Employees

Clontarf Foundation employees must:

- Report all allegations of abuse perpetrated by employees to the host school principal and complete a Clontarf Foundation Incident Report Form.
- If the principal is the alleged perpetrator or may be biased towards the staff member alleged to be responsible, inform the Regional Director of Education

Clontarf Foundation employees must not:

- Interview the child
- Investigate the allegation
- Inform the alleged offender that an allegation has been made

6.13 Record Keeping and Documentation

Clontarf Foundation employees must:

- Document all incidents of possible physical or behavioural indicators and concerns of child abuse,
- provide copies to the principal, and
- complete a Clontarf Foundation Incident Report

6.14 Confidentiality and Protection for Those Who Report Abuse

If a student discloses abuse or family violence, employees must not promise confidentiality, it is an obligation of all Foundation employees to follow mandatory reporting procedures.

Employees who have a concern for their own safety following making a report must inform the host school principal, Regional and Zone Manager. This will be escalated to Chief Operations Officer and General Manager Human Resources

7 REPORTING AND RESPONDING TO COMPLAINTS OR FEEDBACK

Providing opportunities for complaints or feedback ensures that children, young people and their families feel valued and respected, and enables us to improve the quality of our service.

Complaints or feedback can be provided verbally to any employee or direct to management by completing external stakeholder complaints process available on the Clontarf Foundation website, or email contact@clontarffoundation.com.au.

Clontarf foundation will deal with all complaints and feedback received promptly, sensitively and fairly. We will:

- listen to the complaint/ feedback,
- make a record of it using the Clontarf Foundation Incident Report form (if received verbally), and
- advise of the time expected for contact from the Foundation regarding the complaint.

8 COMMUNICATION WITH FAMILIES

Clontarf Foundation encourage communication with families to be frequent through methods including, but not limited to, in person, on the phone, through family visits and by parents and caregivers visiting Academies and attending carnivals, awards nights and excursions.

9 BREACH OF POLICY

Breach of this policy may result in disciplinary action, up to and including termination.

10 REVIEW

This Policy and its implementation will be reviewed on an ongoing basis in terms of its suitability and effectiveness. Internal control systems and procedures will be audited regularly to ensure that they are effective in minimising the risk of non-compliance with this Policy.

11 INTERNAL REFERENCES

- Clontarf Foundation Code of Conduct
- Statement of Commitment to Child Safety
- Social Media Policy
- IT Policy
- Motor Vehicle Policy
- External Stakeholder Complaints Policy
- Whistleblower Policy

12 FURTHER INFORMATION

For any employees seeking further clarification of any aspect of this policy, please raise it with your manager.

External stakeholders seeking further clarification of any aspect of this policy, please email contact@clontarffoundation.com.au.

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