

# Child Safety Policy

Author	Date	ED Approval	Board Adoption
EJT	April 2023	April 2023	April 2023

**MIT'S Purpose:** Supporting Indigenous students to achieve their educational aspirations in Melbourne

**MIT'S Vision:** Empowered Indigenous students inspiring strong communities

**MIT'S Values:** Respect Courage Culture Care

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## 1 Introduction

Melbourne Indigenous Transition School (MITS) has developed the following Child Safety Policy. This policy provides key elements of our approach to protecting children from abuse.

The policy forms the foundation of MITS's procedures, practices, decision-making processes and ultimately MITS's culture with respect to child safety.

It is designed to be published on our public website as well as communicated through other mediums such as newsletters, our annual report and in induction and welcome packs for Board of Directors, staff and Volunteers.

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## 2 Purpose

This Policy outlines how MITS prioritises the safety of children and what steps we will take to do this.

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## 3 Scope

This policy applies to all staff, volunteers, children, Board members, host families who provide accommodation for our students and other individuals involved in our organisation. This policy applies to all activities – classes, boarding activities or otherwise – conducted by MITS.

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## 4 Commitment to child safety

MITS is committed to child safety. We want children to be safe, happy and empowered. We support and respect all children, as well as our staff and volunteers. Child safety is everyone's responsibility.

As a school for Indigenous students, we are committed to the cultural safety of Indigenous children, and to the cultural safety of children from culturally and/or linguistically diverse backgrounds. We are also committed to providing a safe environment for children with disabilities.

We have zero tolerance of child abuse, and all allegations and safety concerns will be treated very seriously and consistently with our robust policies and procedures and all external reporting obligations.

We all have a responsibility to report an allegation of abuse if we have a reasonable belief that an incident took place. Factors contributing to reasonable belief may be:

- (a) a child states they or someone they know has been abused (noting that sometimes the child may in fact be referring to themselves);
- (b) behaviour consistent with that of an abuse victim is observed;

- (c) someone else has raised a suspicion of abuse but is unwilling to report it;
- (d) observing suspicious behaviour.

MIT S is committed to preventing child abuse, identifying risks early, and removing and reducing these risks.

We have specific policies, procedures and training in place that support our Executive Team, Child Safety Officers, staff, Board members and volunteers to achieve these commitments. Importantly in relation to our obligations to report child abuse, all MIT S staff and volunteers should have read, and be compliant with, the Reportable Conduct Policy.

We support and respect all children, as well as our staff and volunteers.

**If you believe a child is at immediate risk of abuse phone 000.**

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## 5 Definitions

**Executive Team** means the Executive Director, the Principal, the Head of Cultural Strength and the Head of Wellbeing.

**Child abuse** means:

- a sexual offence committed against a child
- an offence committed against a child under section 49M(1) of the Crimes Act 1958 (Vic), such as grooming
- physical violence or Harm against a child
- causing serious emotional, psychological or cultural Harm to a child
- serious neglect of a child

whether physical or online.

**Harm** is damage to the health, safety or wellbeing of a child, including as a result of child abuse by adults or the conduct of other children. It includes physical, emotional, cultural, sexual and psychological harm. Harm can arise from a single act or event and can also be cumulative, that is, arising as a result of a series of acts or events over a period of time.

**Child/Children** means a person who is under the age of 18 years.

**Concern** refers to any potential issue that could impact negatively on the safety and wellbeing of children.

**Complaint** is an expression of dissatisfaction to MIT S related to one or more of the following:

- our dealings with individuals in relation to child safety
- allegations of abuse or misconduct by a staff member, a volunteer or another individual associated with MIT S
- disclosures of abuse or harm made by a child or young person
- the conduct of a child or young person at MIT S that may constitute Child Abuse
- the inadequate handling of a prior child safety concern
- general concerns about the child safety of a group of children or activity.

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## 6 What is the role of the MIT S Board?

This Child Safety Policy has been approved and endorsed by the School's Board and is reviewed annually by the Board.

The Board acknowledges that it is the body directly responsible for the adoption by MITS of all necessary child safety policies, procedures and practices, and that that duty cannot be delegated although certain roles and responsibilities can be assigned to management.

The Board will:

- Oversee the promotion of a child safe culture within the broader MITS community;
- Ensure that child safety is a standing agenda item at Board meetings so that a culture of child safety is being embedded and Board members are informed and understand any issues of a child safety concern;
- Undertake annual training on child safety;
- Approve updates to, and act in accordance with the MITS Child Safety Code of Conduct to the extent that it applies to Board members; and
- when appointing Board members, ensure that there are appropriate selection and screening processes.

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## 7 What is the role of the MITS Executive Team?

The Executive Team has the role of making sure MITS prioritises children's safety and that action is taken when anyone raises concerns about children's safety.

The Executive Team will champion and model a child safe culture at MITS. We encourage anyone involved with the organisation to report a child safety concern. The Executive Team will work to create a positive culture around reporting so that people feel comfortable to raise concerns.

The Executive Team is responsible for receiving and managing allegations or disclosures of child abuse, responding appropriately to children who make or are affected by allegations of child abuse, managing complaints, ensuring compliance with this Policy and, where necessary, managing an alternative procedure where a member of the Executive Team cannot perform his or her role.

Everyone at MITS has a role in identifying and managing risks of child abuse and harm. The roles and responsibilities set out in this policy do not displace or discharge any other obligations that arise (for example, mandatory reporting obligations) if a person reasonably believes that a child is at risk of child abuse.

The Executive Team will make sure that staff are conducting risk assessments and taking action to manage risks in accordance with this policy. They will also ensure that appropriate child safety training for staff, volunteers, Board members and any other third party identified as requiring training is identified and completed.

The Executive Team will meet termly to review how effectively MITS is delivering child safety and wellbeing. The input of people involved with MITS may be sought as part of these meetings and the outcomes of each review will be documented.

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## 8 What is the role of MITS's Child Safety Officers?

MITS's Boarding Managers, Head of Wellbeing, our Mental Health Practitioners and the Head of Teaching and Learning have responsibility for acting as MITS's Child Safety Officers. In that capacity, they receive specific child safety training (including site-specific training relating to their location at MITS) and are responsible, as the nominated first point of contact, for responding to any child safety related complaints or concerns.

Children and staff are informed of the role of the Child Safety Officers in relation to child safety so they know and understand who they are, and how and when they may contact them. Photos and names of the Child Safety Officers are displayed across MITS sites.

Notwithstanding the above, all children at MITS should feel empowered to approach any staff member with concerns relating to child safety.

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## 9 What does MITS do to ensure the empowerment and participation of children?

MITS is a child-centred organisation. This Policy is intended to empower children who are vital and active participants in our organisation. We involve them when making decisions, especially about matters that directly affect them. We listen to their views and respect what they have to say.

We want children to develop new communities through MITS and encourage children to be supportive of each other. We do not tolerate bullying or abusive behaviour between children and take action if this occurs.

We respect the rights of children and provide them with information about their rights including the right to be safe at MITS. We actively seek to understand what makes children feel safe in our organisation. We regularly communicate with children about what they can do if they feel unsafe.

MITS values the voices of children and will act on safety concerns raised by children or their families. MITS supports children's participation in the following ways:

- Early in each school year, providing education and training for students on their rights in relation to child safety, and how to raise concerns and access support services.
- Regular discussions between MITS teachers, boarding staff, the Wellbeing Team and children about child safety, including child-led conversations on what makes them feel safe and unsafe.
- Consultation with children about any proposed significant changes to the physical environment, policies, procedures, programs or staffing. Children's views are considered in the decision-making process.
- Information provided to children and families about MITS operations, staffing and programs are made suitable for different age groups and diversity of the children. Child safety information sessions will be offered in language where needed.
- By running a Student Representative Council, which considers all matters related to student experience at MITS, including child safety.

We promote diversity and tolerance in our organisation, and people from all walks of life and cultural backgrounds.

MITS students will be offered access to sexual abuse prevention programs (including relating to online environments) and associated information that are age appropriate.

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## 10 What does MITS do to involve families and communities?

MITS recognises the important role of families and involves parents and carers when making significant decisions about their child.

Parents, families and communities are welcome to provide feedback at any time by telephone or email and are encouraged to raise any concerns they have with MITS. From time to time, MITS will seek input from parents on matters relating to child safety, through surveys or direct contact.

MITS provides information to families and community about our child safe policies and practices including through:

- publishing this Child Safety Policy and Code of Conduct on our website; and
- including information about our child safety approach, our operations and management structure so far as they relate to child safety and wellbeing, in communications with MITS parents and carers, including at orientation events.

MITS will actively involve parents and carers in any decisions that relate to their child's safety or wellbeing. Family members will be briefed on this Policy at the orientation of their child to MITS and are encouraged to read and abide by this Policy.

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## 11 How does MITS create culturally safe environments for our Indigenous children and their families?

MITS is committed to creating environments where Indigenous cultures are celebrated and Indigenous children, families and community members are welcomed and included. Strategies to embed cultural safety for Indigenous children include:

- the creation of a designated role overseeing cultural safety and strength, being the Head of Cultural Strength;
- the creation and delivery of MITS's Reconciliation Action Plan;
- an Acknowledgement of Country before classes each day and before any public MITS events;
- consulting with families and members of our students' communities and the local Aboriginal community in Melbourne to identify opportunities to promote Indigenous cultures and practices at MITS;
- providing opportunities for children to share their cultural identity and express their culture;
- supporting children who wish to explore their culture, including consulting with their family and relevant Indigenous organisations;
- providing training for staff and volunteers on the strengths of Indigenous cultures and its importance to the wellbeing and safety of Indigenous children;
- celebrating NAIDOC Week and acknowledging significant cultural dates and events including National Sorry Day and National Reconciliation Week;
- seeking feedback from our students, families and communities on their experience at MITS, and from our Indigenous staff, particularly on how safe they feel expressing their identity including their culture;
- striving to reflect the diversity of our community through representation in our staff, Executive Team members and Board of Directors – we are committed to having representatives of First Nations background on our Executive Team and throughout our workforce;
- having a physical and online environment that actively celebrates diversity and inclusion of First Nations People;
- adopting measures in accordance with MITS's Racism Prevention Policy to ensure racism is identified, confronted and not tolerated and that appropriate consequences flow from any incident of racism.

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## 12 How does MITS value diversity?

We value diversity and equity for all children and pay particular attention to the needs of diverse students. To achieve this, we:

- provide training for all staff and volunteers on understanding diversity and how to support diversity and inclusion;
- welcome and support participation of all children, including children with disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, LGBTIQI children and their families;
- offer students and families through our enrolment forms the opportunity to provide information about themselves, including any specific needs to participate fully in our programs;
- have zero tolerance of racism and other forms of discrimination and take action when discrimination or exclusion is identified;
- deliver programs that reflects the diversity of our students, their interests and cultures;
- commit to ensuring our facilities and online activities promote inclusion of children of all abilities.

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## 13 Code of Conduct

MIT S has a Child Safety Code of Conduct. Staff and volunteers must comply with the Code of Conduct at all times. Breaches of the Child Safety Code of Conduct may result in disciplinary action including termination of a person's employment or involvement with MIT S.

All third-party contractors are also expected to abide by the Child Safety Code of Conduct, and where they are engaging with children may be required to sign an agreement to comply with the Code, prior to delivering any services.

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## 14 Recruiting staff and volunteers

MIT S puts child safety and wellbeing at the centre of recruitment and screening processes for staff and volunteers. We only recruit staff and volunteers who are appropriate to engage with children. Members of the MIT S Board must also be screened.

We require a Working with Children Clearance and referee checks (including enquiring about their history of working with children) for all staff and volunteers. We require staff to provide proof of personal identity, have appropriate qualifications for their roles and check regularly to make sure these qualifications are valid.

Members of the MIT S Board must also hold a valid Working with Children Clearance.

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## 15 How does MIT S support staff and volunteers to ensure child safe environments at MIT S?

All MIT S Board members, staff and volunteers are required to complete annual child safety training. Training records will be maintained on MIT S's databases.

Issues or concerns about behaviour with children will be raised immediately and addressed in line with our Code of Conduct and Complaints Handling Policy.

Our organisational culture aims for all staff and volunteers (in addition to parents/carers and children) to feel confident and comfortable in discussing any allegations of child abuse or child safety concerns.

Staff and volunteers will receive induction training, annual training and supervision:

- **(Policy and Code of Conduct)** to support their engagement with children and for compliance with our Child Safety Code of Conduct, Child Safety Policy, our Reportable Conduct Policy and all external reporting obligations (such as mandatory reporting);
- **(Complaints Handling Policy)** in the execution of our Complaints Handling Policy;
- **(child abuse risk factors)** in the identification, assessment, and minimisation of risks of child abuse, whether by an adult or a child, and to detect potential signs of child abuse, without compromising a child's right to privacy, access to information, social connections and learning opportunities;
- **(children's rights)** in the understanding of children's rights;
- **(cultural safety)** in the promotion of the cultural safety of Indigenous children, the cultural safety of children from linguistically diverse and/or diverse backgrounds, and the safety of children with a disability;
- **(Indigenous cultures)** in the strengths of Indigenous cultures and their importance to the wellbeing and safety of Indigenous children;
- **(diversity)** in understanding diversity and how to support diversity and inclusion;
- **(record keeping)** in MIT S's record keeping and information sharing policies and processes; and
- **(risk assessment)** in the development of their skills in risk assessment and management.

All employees and volunteers, but particularly new employees and volunteers, will be supervised

regularly, as well as checking that their behaviour towards children is safe and appropriate (please refer to the Child Safety Code of Conduct to understand appropriate behaviour further).

Any inappropriate behaviour will be reported by MITS to relevant bodies, including the Department of Health and Human Services, the Commission for Children and Young People (the 'Commission') and Victoria Police, depending on the severity and urgency of the matter.

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## 16 How does MITS handle complaints and report child safety concerns?

All reports of child abuse and child safety concerns will be treated seriously, whether they are made by an adult or a child and whether they are about the conduct of an adult or a child. All complaints and child safety concerns will be responded to promptly and thoroughly.

MITS has a Complaints Handling Policy that includes information for staff and volunteers about how a complaint or child safety concern will be responded to. An easy-to-understand complaints information sheet will be provided for children, families and the community to know about the complaint process and the supports available to those making a complaint and those involved in the complaint process.

If a complaint includes an allegation or incident of child abuse or harm, then staff and volunteers at MITS must report it in accordance with the Complaints Handling Policy and/or the Reportable Conduct Policy. MITS staff and volunteers are required to prioritise children's safety in any response and to report all potentially criminal conduct to Victoria Police, the Department of Health and Human Services and/or the Commission. Under the Complaints Handling Policy, staff and volunteers may be subject to actions to support child safety including:

- being stood down during an investigation or terminated following an investigation;
- having their duties altered so they do not engage with children at MITS;
- not allowing unsupervised contact with children at MITS;
- removing their access to the MITS's IT system and facilities.

To raise a complaint, you can contact any member of the Executive Team or a Child Safety Officer.

The safety and wellbeing of children is our primary concern. We are also fair and just to staff and volunteers. The decisions we make when recruiting, assessing incidents, and undertaking disciplinary action will always be thorough, transparent, and based on evidence.

Reportable Conduct of staff, volunteers and others should be reported in accordance with the Reportable Conduct Policy.

We record all allegations of abuse and safety concerns using a copy of our Child Safety Reporting Template, including investigation updates. All records are securely stored.

If an allegation of abuse or a safety concern is raised, we provide regular updates to children and families on progress and any actions we as an organisation take.

Fulfilling the roles and responsibilities in the complaints handling policy does not displace or discharge any other obligations that arise if a person reliably believes that a child is at risk of child abuse.

**If there is concern for the immediate safety of a child, immediately call 000.**

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## 17 How does MITS keep records in relation to child safety?

MITS is committed to making and keeping full and accurate records about all child-related complaints or safety concerns and all MITS staff, volunteers and Board Members will receive training to ensure full understanding of their obligations in this regard.

All child safety complaints, concerns, incidents and near misses will be recorded on MITS's IT systems, and to the extent necessary, usually where an incident has occurred that needs to be mandatorily

reported, will be supplemented by additional reporting in the Child Safety file accessible only by the Executive Team.

Records which may assist with the investigation of a complaint or safety concern will be identified and kept as part of the record of an investigation. Records will be kept even if an investigation does not substantiate a complaint.

We will record and keep the outcome of any investigations, and the resolution of any complaints. This includes findings made, reasons for decisions and actions taken.

With regards to child safety records, these will be stored securely and kept by MITS in accordance with the current standards of the Public Records Office Victoria.

Documentation relating to the organizational response to child sexual abuse will be retained:

- for at least 45 years in respect of training and development records;
- for 99 years in respect of reporting and investigation records; and
- indefinitely in respect of the development of policy, strategy and procedure.

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## 18 Information sharing

MITS may share relevant information to promote the safety and wellbeing of children, where it is appropriate and in their best interests.

We may also need to share information about incidents or complaints with external authorities to comply with the law or to prioritise safety. More information is available in our Complaints Handling Policy.

All personal information considered or recorded will respect the privacy of the individuals involved, whether they be staff, volunteers, parents or children, unless there is a risk to someone's safety. We have safeguards and practices in place to ensure any personal information is protected. Everyone is entitled to know how this information is recorded, what will be done with it, and who will have access to it. Personal information will always be treated in accordance with MITS's Privacy Policy and our Employee Records Policy.

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## 19 How does MITS manage child safety risks?

In Victoria, organisations are required to protect children when a risk is identified. In addition to general occupational health and safety risks, we proactively manage risks of abuse to our children. We recognise the importance of identifying and managing risks of child harm and abuse in the physical and online environments operated by MITS.

We have risk management strategies in place for all sites from which we operate to identify, assess, and take steps to minimise child abuse risks, which include risks posed by physical environments (for example, any doors that can lock), and online environments (for example, no staff or volunteer is to have contact with a child on social media).

We conduct regular risk assessments and have a risk management plan for each site from which MITS operates to address the risk of child abuse and harm at MITS. The risk management plans will be reviewed and updated on a regular basis in consultation with our staff, volunteers, parent representatives and children. We will ensure that any risk controls put in place balance the need to manage harm with the benefits of participating at MITS. The Executive Team is responsible for approving our risk management plans.

Any contractors or other providers of services will always be supervised by a member of staff while working with us to ensure child safety and specific risk assessments for each instance of students' exposure to such services will be undertaken. We will review the child safety policies and procedures of third-party contractors to ensure compliance with child safety requirements and, if necessary, to require them to sign MITS's Child Safety Code of Conduct.



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## 20 Non-compliance with this policy and the Child Safety Code of Conduct

MITS will enforce this policy, the Child Safety Code of Conduct and any other child safety and wellbeing policies (see list below). Potential breaches by anyone will be investigated and may result in restriction of duties, suspension or termination of employment or engagement or other corrective action. More information can be found in our Complaints Handling Policy.

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## 21 Review

MITS (through the Executive Team) will review all child safe practices and policies, and their success or otherwise in ensuring that it provides a child safe environment, on a termly basis (or more frequently as required by legislation or regulation).

We also review relevant practices and policies in response to a child safety incident or 'near miss'.

Findings from reviews will be reported to the people involved in our organisation and also inform our approach to continuous improvement of our child safety practices.

Reviews are overseen by the Executive Team and will be informed by consultation with children, families and staff.

Specifically, we will review:

- whether MITS has fully implemented each of the Child Safe Standards;
- how MITS engages children, families, communities, staff and volunteers in review processes and provides feedback on review outcomes;
- how MITS regularly analyses complaints, concerns, incidents or significant breaches of policy to identify causes or systemic weaknesses and implements improvements; and
- how MITS communicates with its community about the findings and actions taken in response to reviews.

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## 22 Supporting documents – MITS child safety and wellbeing system

The following policies and procedures work together to support child safety and wellbeing across all of our operations:

- Child Safety Policy
- Child Safety Code of Conduct
- Student Health and Wellbeing Policy
- Reportable Conduct Policy
- MITS's site specific Emergency Management Plans and incorporated risk assessment and management tables
- Complaints Handling Policy
- Employee Records Policy
- Privacy Policy
- Recruitment and Screening Policy
- Risk Management Plans
- processes to ensure the documents listed above are informed by stakeholder consultation
- processes to ensure MITS uses information from experts and other organisations to inform its policies and procedures
- display of identities of Child Safety Officers

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## 23 Supporting legislation

Our organisation takes our legal responsibilities seriously, including:

- (a) **Failure to disclose:** Reporting child sexual abuse is a community-wide responsibility. All adults in Victoria who have a reasonable belief that an adult has committed a sexual offence against a child under 16 have an obligation to report that information to the police.
- (b) **Failure to protect:** People of authority in our organisation will commit an offence if they know of a substantial risk of child sexual abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so.
- (c) **Any** personnel who are **mandatory reporters** must comply with their duties.
- (d) **Other relevant legislation** with which our organisation needs to be compliant includes:
  - Ministerial Order No. 1359 – Implementing the Child Safe Standards
  - Child Wellbeing and Safety Act 2005 (Vic) (including Child Safe Standards)
  - Children, Youth and Families Act 2005 (Vic) (including reporting to Child Protection)
  - Crimes Act 1958 (Vic) (including Failure to Protect and Failure to Disclose offences)
  - Wrongs Act 1958 (Vic) (including Part XIII – Organisational liability for child abuse)
  - Wrongs Act 2018

**25 What we say we will do, who will do it and how often**

Para	What	Who	When
6	School Board to approve and endorse, and review annually the Child Safety Policy	Board	Annually
7	Ensure that staff are conducting risk assessments and taking action to manage risks in accordance with this policy.	Executive Team	In accordance with this policy
7	Ensure that appropriate child safety training for staff and volunteers is identified and completed.	Executive Team	In accordance with this policy
7	Conduct a termly review of how effectively MITS is delivering child safety and wellbeing. The input of people involved with MITS will be sought as part of this review.	Executive Team	Each term
8	Involve students when making decisions relating to Child Safety	All staff and volunteers	At all times
8	Actively seek to understand what makes children feel safe in our organisation. Regularly communicate with children about what they can do if they feel unsafe.	All staff and volunteers	At all times



9	<p>Provide information to families and community about our child safe policies and practices including through:</p> <ul style="list-style-type: none"> <li>publishing this Child Safety Policy and Code of Conduct on our website; and</li> <li>Include information about our child safety approach, our operations and management structure so far as they relate to child safety and wellbeing, in communications with MITS parents and carers, including at orientation events.</li> </ul>	Executive Team	As required
10	Consult with families and members of our students' communities and the local Aboriginal community in Melbourne to identify opportunities to promote Indigenous cultures and practices at MITS	All staff	Regularly
10	Seek feedback from our students, families and communities on their experience at MITS, and from our Indigenous staff, particularly on how safe they feel expressing their identity including their culture;	Executive Team	Regularly
11	Offer students and families through our enrolment forms the opportunity to provide information about themselves, including any specific needs to participate fully in our programs	Executive Team	On enrolment
12	Require all third-party contractors to abide by the Child Safety Code of Conduct, and where they are engaging with children potentially require them to sign an agreement to comply with the code, prior to delivering any services	Anyone procuring services of a 3 <sup>rd</sup> party contractor	As required
13	<p>Require a Working with Children Clearance and referee checks (including enquiring about their history of working with children) for all staff and volunteers.</p> <p>Require staff to provide proof of personal identity, have appropriate qualifications for their roles and check regularly to make sure these qualifications are valid.</p>	People and Capability Manager	Prior to start of employment at MITS

13	Require members of the MITS Board to hold a valid Working with Children Clearance	People and Capability Manager	Prior to commencement of role as Director
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14	<p>Provide all staff and volunteers with induction training, annual training and supervision:</p> <ul style="list-style-type: none"> <li>• <b>(Policy and Code of Conduct)</b> to support their engagement with children and for compliance with our Child Safety Code of Conduct and Child Safety Policy and all external reporting obligations (such as mandatory reporting);</li> <li>• <b>(Complaints Handling Policy)</b> in the execution of our Child Safety Complaint Handling Policy</li> <li>• <b>(Reportable Conduct Policy)</b> in the execution of our Reportable Conduct Policy</li> <li>• <b>(child abuse risk factors)</b> in the identification, assessment, and minimisation of risks of child abuse, whether by an adult or a child, and to detect potential signs of child abuse, without compromising a child's right to privacy, access to information, social connections and learning opportunities;</li> <li>• <b>(children's rights)</b> in the understanding of children's rights;</li> <li>• <b>(Cultural safety)</b> in the promotion of the cultural safety of Indigenous children, the cultural safety of children from linguistically and/or diverse backgrounds, and the safety of children with a disability;</li> <li>• <b>(Indigenous Culture)</b> in the strengths of Indigenous cultures and its importance to the wellbeing and safety of Indigenous children;</li> <li>• <b>(Diversity)</b> in understanding diversity and how to support diversity and inclusion;</li> <li>• <b>(record keeping)</b> in MITS's record keeping and information sharing policies and processes; and</li> <li>• <b>(risk assessment)</b> in the development of their skills in risk assessment and management.</li> </ul>	Executive Team	Annually
		Executive Team	On induction
		Executive Team	On induction
		Executive Team	On induction
		Executive Team	On induction
		Executive Team	On induction
		Executive Team	On induction
		Executive Team	On induction
		Executive Team	On induction
		Executive Team	On induction



		Executive Team	On induction
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14	All employees and volunteers, but particularly new employees and volunteers, will be supervised regularly	Boarding and teaching staff	For at least probation period
15	Provide a Complaints Handling Policy to staff and volunteers about how a complaint or child safety concern will be responded to.	Executive Team	On induction
15	Provide an easy-to-understand complaints information sheet to students, families and the community to inform them about the complaint process and the supports available to those making a complaint and those involved in the complaint process	Executive Team	On enrolment
15	Record all allegations of abuse and safety concerns using our incident reporting form, including investigation updates. Store all records securely.	Executive Team	As required
15	If an allegation of abuse or a safety concern is raised, provide updates to children and families on progress and any actions we as an organisation take.	Executive Team	As required
16	Identify and appoint MITS Child Safety Officers	Executive Team	Ongoing
16	Inform students and staff of the role of the Executive Team in relation to child safety so they know and understand who they are, and how and when they may contact them.	Executive Team	Ongoing
16	Display photos and names of the Child Safety Officers across MITS sites	Executive Team	Ongoing
17	Securely record all child safety complaints, concerns, incidents and near misses in Sentral, and to the extent necessary supplemented those records with additional reporting in the Child Safety file accessible only by the Executive Team	Executive Team	As required

17	<p>For documentation relating to the organizational response to child sexual abuse, retain:</p> <ul style="list-style-type: none"> <li>• for at least 45 years in respect of training and development records;</li> <li>• for 99 years in respect of reporting and investigation records; and</li> <li>• indefinitely in respect of the development of policy, strategy and procedure</li> </ul>	Executive Team	As required
18	Treat personal information in accordance with MITS's Privacy Policy and our Employee Records Policy	All staff and Board Members	Always
19	Conduct regular risk assessments and have a risk management plan for each site from which MITS operates to address the risk of child abuse and harm at MITS.	Executive Team	Regularly
19	Review and update risk management plans on a regular basis in consultation with our staff, volunteers, parent representatives and children.	Executive Team	Regularly
19	Supervise any contractors or other providers of services while working with MITS to ensure child safety and conduct specific risk assessments for each instance of students' exposure to such services.	Procurer of 3 <sup>rd</sup> party services	As required
19	Review the child safety policies and procedures of third-party contractors to ensure compliance with child safety requirements and, if necessary, require them to sign MITS's Child Safety Code of Conduct	Procurer of 3 <sup>rd</sup> party services	As required
21	Review all child safe practices and policies, and its success or otherwise in ensuring that it provides a child safe environment.	Executive Team	At least termly (or more frequently as required by legislation or regulation)
21	Review relevant practices and policies in response to a child safety incident or 'near miss'.	Executive Team	As required
21	Report findings from reviews to the people involved	Executive Team	As required
21	Inform reviews through consultation with children, families and staff.	Executive Team	As required

21	<p>Ensure that reviews cover:</p> <ul style="list-style-type: none"> <li>• Whether MITS has fully implemented each of the Child Safe Standards;</li> <li>• How MITS engages children, families, communities, staff and volunteers in review processes and provides feedback on review outcomes;</li> <li>• How MITS regularly analyses complaints, concerns, incidents or significant breaches of policy to identify causes or systemic weaknesses and implements improvements</li> </ul>	Executive Team	As required
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## 26 MITS Implementation of Child Safe Standards

Cultural safety for Aboriginal children	Where covered in MITS Child Safety Policy
<p><b>Child Safe Standard 1:</b> <i>Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued.</i></p>	<p><b>Paras 4, 10, 11, 12, 15</b></p>
<p>Describe strategies used by the organisation to create a culturally safe environment for Aboriginal children.</p> <p>Consider:</p> <p>How the organisation will describe its commitment to the cultural safety of Aboriginal children.</p> <ul style="list-style-type: none"> <li>• Outlining the key actions the organisation will take to create an inclusive and welcoming physical and online environment for Aboriginal children and their families.</li> <li>• How the organisation will support, guide or train staff and volunteers and leaders to understand, respect and value Aboriginal culture and to understand the importance of this to the safety and wellbeing of Aboriginal children.</li> <li>• How staff and volunteers will encourage and support children to express their culture and enjoy their cultural rights.</li> <li>• How the organisation will support and facilitate participation and inclusion within the organisation by Aboriginal children and their families.</li> <li>• What the organisation’s approach is to racism.</li> <li>• How the organisation promotes the participation and inclusion of Aboriginal children and their families.</li> </ul>	

A commitment to child safety and wellbeing	Where covered in MITS Child Safety Policy
<p><b>Child Safe Standard 2:</b> <i>Child safety and wellbeing is embedded in organisational leadership, governance and culture.</i></p>	<p><b>Paras 4, 8, 13, 18, 19, 21, 21</b></p>
<p>Describe how the organisation puts into practice its commitment to child safety and wellbeing and how a child safe culture is championed and modelled at all levels of the organisation.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• How the organisation will describe its commitment to child safety and wellbeing.</li> <li>• What the organisation’s expectations and practices are about child safety and wellbeing and what the governance arrangements are to ensure this is achieved.</li> <li>• How leaders, staff and volunteers will champion a child safe culture and the expectations around child safety and reporting.</li> <li>• How and when leaders will monitor and review the organisation’s performance in delivering child safety and wellbeing.</li> </ul>	

<ul style="list-style-type: none"> <li>• What should be in the organisation’s Code of Conduct, who needs to comply with it, and what happens if a person breaches it.</li> <li>• What the organisation’s approach is to record keeping and information sharing.</li> </ul>	
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<b>Taking child participation and empowerment seriously</b>	<b>Where covered in MITS Child Safety Policy</b>
<b>Child Safe Standard 3:</b> <i>Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.</i>	<b>Paras 9, 15</b>
<p>Describe strategies used by the organisation to empower children to know their rights and have their rights respected, participate in decision-making and have their voices heard.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• How the organisation will educate and engage with children about their rights, safe environments and how to raise concerns and access support services.</li> <li>• Key processes or opportunities for children to participate in the organisation and contribute to decision-making.</li> <li>• Ways the organisation seeks the views of children and encourages their participation, including on safety and wellbeing issues.</li> <li>• Information or training provided to staff and volunteers so they understand the rights of children, are skilled at engaging with children and helping them participate in decision-making and can recognise and act on the signs of child abuse and harm.</li> <li>• Ways the organisation promotes friendships and peer support for children.</li> <li>• Whether sexual abuse prevention information will be offered to children.</li> </ul>	

<b>Involving families and communities</b>	<b>Where covered in MITS Child Safety Policy</b>
<b>Child Safe Standard 4:</b> <i>Families and communities are informed and involved in promoting child safety and wellbeing.</i>	<b>Paras 10, 11</b>
<p>Describe how the organisation puts into practice effective communication and participation strategies for engaging with, and responding to, the diversity of families and communities.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• How families can participate in decisions that impact their child.</li> <li>• How families and communities are given information about the organisation’s child safety and wellbeing policies.</li> </ul>	

<ul style="list-style-type: none"> <li>• How the organisation provides information about the organisation's governance and operations, complaints processes and disciplinary processes.</li> <li>• How the organisation seeks and responds to feedback from family and community members.</li> <li>• Ways the organisation seeks the input of families and communities on the organisation's approach to child safety and wellbeing.</li> <li>• How the organisation engages with families and communities to build cultural safety for children in the organisation.</li> </ul>	
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<b>Respecting equity and diversity</b>	<b>Where covered in MITS Child Safety Policy</b>
<p><b>Child Safe Standard 5:</b> <i>Equity is upheld and diverse needs respected in policy and practice.</i></p>	<p><b>Paras 9, 10, 11, 12, 15</b></p>
<p>Describe how the organisation creates an environment where children's diverse circumstances and needs are recognised, and all children feel safe, welcome and included.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• How the organisation will describe its commitment to equity and inclusion.</li> <li>• Ways the organisation will recognise and respect the diverse needs of all children and provide ways for children or their families to identify their individual needs.</li> <li>• How the organisation will provide children with access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.</li> <li>• How the organisation will respond to the needs of all children, with a particular focus on those experiencing vulnerability or disadvantage.</li> <li>• How the organisation upholds equity for all children and prevents child abuse and harm resulting from discrimination based on disability, race, ethnicity, religion, sex, intersex status, gender identity or sexual orientation.</li> <li>• Training for staff and volunteers on identifying and responding to children with diverse circumstances and needs.</li> </ul>	

<b>Ensuring that staff are suitable and supported</b>	<b>Where covered in MITS Child Safety Policy</b>
<p><b>Child Safe Standard 6:</b> <i>People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.</i></p>	<p><b>Paras 14, 15</b></p>
<p>Describe how the organisation puts into practice its recruitment and staff development policies including screening, induction and supervision to ensure that staff and volunteers reflect child safety and wellbeing values in practice.</p>	

<p>Consider:</p> <ul style="list-style-type: none"> <li>• How to describe the organisation's approach to recruitment, including advertising, position descriptions, selection criteria, pre-employment screening and referee checks.</li> <li>• How you will regularly check qualifications, Working with Children Check and other registration or ongoing screening checks remain valid.</li> <li>• What training will be provided for staff and volunteers on their child safety and wellbeing responsibilities, the organisation's child safety and wellbeing policies and procedures, external reporting obligations (such as mandatory reporting), the Code of Conduct, the complaints process, information sharing and record keeping.</li> <li>• The organisation's approach to supervision, support and performance management of staff and volunteers.</li> </ul>	
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<b>Child-focused complaint systems</b>	<b>Where covered in MITS Child Safety Policy</b>
<p><b>Child Safe Standard 7:</b> <i>Processes for complaints and concerns are child-focused.</i></p>	<p><b>Paras 16, 18, 19</b></p>
<p>Describe how the organisation ensures that it has accessible and responsive complaints management processes that are focused on the needs and rights of children.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• The organisation's approach to receiving, responding to and investigating concerns or complaints of child abuse or harm and how the organisation prioritises the safety and wellbeing of children.</li> <li>• How the organisation provides child-friendly and accessible information to children, families and community members about how they can raise concerns and how those concerns will be responded to and investigated.</li> <li>• The roles and responsibilities of staff and volunteers in the complaints process and how staff and volunteers should respond to children who disclose abuse.</li> <li>• The organisation's approach to privacy and confidentiality.</li> <li>• What must be reported to external authorities and how this should be done.</li> <li>• Record keeping and information sharing requirements.</li> <li>• What employment law obligations are relevant to complaint handling.</li> <li>• How the organisation will respond to concerns or complaints relating to abuse or harm caused to a child by another child.</li> <li>• What needs to be done to identify and respond to risks to the safety of children when a complaint or safety concern is raised.</li> <li>• What support is available to those making a complaint and those involved in the complaint process.</li> </ul>	



Staff knowledge, skills and awareness	Where covered in MITS Child Safety Policy
<p><b>Child Safe Standard 8:</b> <i>Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.</i></p>	<p><b>Para 15</b></p>
<p>Describe how the organisation promotes child safety and wellbeing by ensuring that staff and volunteers are provided with relevant knowledge and skills on an ongoing basis.</p> <p>Staff and volunteers need training and information on issues such as:</p> <ul style="list-style-type: none"> <li>• children’s rights</li> <li>• the organisation’s child safety and wellbeing policies and procedures</li> <li>• recognising signs of child abuse or harm</li> <li>• responding to disclosures</li> <li>• understanding and responding to harmful behaviours by a child towards another child</li> <li>• record keeping</li> <li>• risk assessment and management</li> <li>• external reporting obligations</li> <li>• creating culturally safe and inclusive environments and responding to racism.</li> </ul> <p>Consider:</p> <ul style="list-style-type: none"> <li>• How you will identify training needs for staff and volunteers and how you will record attendance.</li> <li>• How information will be made available to staff and volunteers and who is responsible for providing this.</li> <li>• How the organisation will provide support for staff and volunteers.</li> </ul>	

Safe physical and online environments	Where covered in MITS Child Safety Policy
<p><b>Child Safe Standard 9:</b> <i>Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.</i></p>	<p><b>Paras 16, 19</b></p>
<p>Describe how the organisation promotes child safety and wellbeing in physical and online environments in order to reduce the risk of harm.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• How the organisation will develop and implement risk management plans.</li> <li>• How risk management plans will be informed by and responsive to the views of staff, volunteers, parents and carers and children.</li> <li>• How to minimise risks of child abuse and harm without compromising children’s right to privacy, access to information, social connections and learning opportunities.</li> <li>• Online as well as physical environments.</li> </ul>	

<ul style="list-style-type: none"> <li>Any procurement by the organisation and how to ensure child safety and wellbeing when contracting third parties.</li> </ul>	
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Review of child safe policies and practices	Where covered in MITS Child Safety Policy
<p><b>Child Safe Standard 10:</b> <i>Implementation of the Child Safe Standards is regularly reviewed and improved.</i></p>	<p><b>Paras 8, 21</b></p>
<p>Describe how the organisation continues to reflect on and improve its child safety and wellbeing policies and practices.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>How frequently this policy, and the organisation's other child safety and wellbeing policies and procedures, will be reviewed and who is responsible.</li> <li>How you will make sure the organisation has fully implemented each of the Standards.</li> <li>How the organisation engages children, families, communities, staff and volunteers in review processes and provides feedback on review outcomes.</li> <li>How the organisation regularly analyses complaints, concerns, incidents or significant breaches of policy to identify causes or systemic weaknesses and implements improvements.</li> <li>How you will tell the organisation's community about the findings and actions taken in response to reviews.</li> </ul>	

Documenting policies and procedures	Where covered in MITS Child Safety Policy
<p><b>Child Safe Standard 11:</b> <i>Policies and procedures document how the organisation is safe for children and young people.</i></p>	<p><b>Para 22</b></p>
<p>Describe how the organisation documents and makes available its policies and procedures for ensuring the safety and wellbeing of children.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>What documents are needed to demonstrate how the organisation supports child safety and wellbeing (including a Code of Conduct, risk assessment and management plans, complaint handling policy, recruitment policy, human resources and volunteering policies, procurement policy and policies on record keeping and information sharing).</li> <li>Which information will be in the Child Safety Policy and which information will be in other policies and procedures, ensuring all policies and procedures together address all the requirements of the Standards.</li> <li>How to make sure these documents are informed by stakeholder consultation.</li> <li>How the organisation uses information from experts and other organisations to inform policies and procedures.</li> </ul>	

<ul style="list-style-type: none"><li>• How the organisation will monitor if leaders, staff and volunteers understand child safety and wellbeing policies and procedures, have implemented them and are following them.</li><li>• The expectations for leaders, staff and volunteers in complying with and implementing child safety and wellbeing policies and procedures.</li></ul>	
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