

Child Safety Policy

Author	Date	ED Approval	Board Adoption
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MITS Purpose: Supporting Indigenous students to achieve their educational aspirations in Melbourne

MITS Vision: Empowered Indigenous students inspiring strong communities

MITS Values: Respect Courage Culture Care

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 and young people 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 the Board of Directors, staff and volunteers.

2 Purpose

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

3 Scope

This policy applies to all directors, staff including non-student-facing staff and temporary or casual staff, volunteers (direct and indirect), children and young people, host families who provide accommodation for our students and other individuals involved in our organization, as well as third party contractors, consultants and service providers, teaching students on placement at MITS and visitors. This policy applies to all activities – classes, boarding activities or otherwise – conducted by MITS.

4 Commitment to Child Safety

MITS is committed to child safety. We want children and young people to be physically and psychologically safe, happy and empowered. We support and respect all children and young people, as well as the people who support and work with them. Child safety is everyone's responsibility.

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

We have zero tolerance of child abuse, and every allegation and safety concern will be treated seriously in line with our policies and, procedures and our 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 or if we have a concern about a potential risk of harm.

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 when talking about someone they know);
- (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; or
- (d) observing suspicious behaviour.

MITS 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 Board members, Executive Team, Child Safety Officers, staff, students and volunteers to achieve these commitments.

Importantly in relation to our obligations to report child abuse, all MITS staff and volunteers are required to have read, and be compliant with this policy and the Reportable Conduct Policy.

We support and respect all children and young people.

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

5 Definitions

Executive Team means the Chief Executive Officer, the Principal, the Head of Boarding and Wellbeing.

Child abuse means:

- a sexual offence committed against a child or any other sexual abuse of 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, including family violence;
- causing emotional, psychological or cultural Harm to a Child;
- serious neglect of a child;

whether physical, verbal 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 or young people. 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. Harm can be the result of the behaviour of an individual or a group of people.

Complaint is an expression of dissatisfaction to MITS 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 MITS;
- disclosures of abuse or harm made by a child or young person;
- the conduct of a Child or young person at MITS that may constitute Child abuse;
- the inadequate handling of a prior child safety concern; or
- general concerns about the child safety of a group of children or activity.

Wellbeing Team means the team at MITS responsible for the wellbeing of MITS students, managed by the Wellbeing Manager.

6 What is the role of the MITS Board?

This Child Safety Policy has been approved and endorsed by the School's Board and is reviewed at least every other year 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.

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 the safety of children and young people.

The Executive Team will champion and model a child safe culture at MITS. We require anyone involved with MITS, who has a child safety concern, to report it. 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 (but this does not derogate from any mandatory requirements to report elsewhere in addition), 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, or students need to be separated.

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 has been abused or 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 each term to review how effectively MITS is delivering on our child safety and wellbeing commitments. The input of people involved with MITS may be sought as part of these meetings and the outcomes of each review will be documented.

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 are 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 and adults at MITS should feel empowered to approach any staff member with any concerns relating to child safety.

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 and consider what they have to say.

We want children to develop new communities through MITS and encourage children to be supportive and respectful of each other. We do not tolerate bullying, discrimination and harassment 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 and feel 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, and children's views are considered in the decision-making process;
- information is provided to children and families about MITS operations, and staffing with programs that are made suitable for different age groups and diversity of the children;
- child safety information sessions will be offered in language where needed and interpreters will be used if helpful in disability related situations;
- by running a Student Representative Council, which considers all matters related to student experience at MITS, including child safety; and
- by ensuring that through the discovery, reporting, investigation and resolution of any allegation of child abuse, MITS will use every endeavour to care for and protect any student the subject of such an allegation, and any other student connected to the subject matter of the allegation, until its resolution.

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

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

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 a child or young person.

Parents, families and communities are welcome to provide feedback at any time by telephone, text, or email and are encouraged to raise any concerns they have with MITS. From time to time, MITS will seek input from parents/guardians 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/guardians and carers, including at orientation events.

MITS will actively involve parents/guardians 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.

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 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 our Board of Directors, Executive Team, 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 Executive Team, staff, volunteers and Board of Directors – we are committed to having representatives of First Nations background on our Executive Team, Board of Directors 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 and vilification are understood, identified, confronted and eliminated, ensuring that appropriate consequences flow from any incident of racism or vilification.

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 Board members, staff, volunteers and students 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, and LGBTQI children as well as 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 harassment, taking action when unacceptable behaviour including exclusion is identified;
- deliver programs that reflect the diversity of our students, their interests and cultures; and
- commit to ensuring our facilities and online activities to promote inclusion of children of all abilities.

13 Code of Conduct

MITS has a Child Safety Code of Conduct. Directors, staff and volunteers and others engaged by MITS 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 MITS.

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

14 Recruiting staff and volunteers

MITS puts child safety and wellbeing at the centre of recruitment and screening processes for staff, volunteers, contractors and consultants. We only recruit staff and volunteers who are appropriate to engage with children and require others who engage with MITS to be of fit and proper character. Members of the MITS Board must also be screened prior to joining.

We require a Working With Children Check and referee statements for all staff and volunteers we recruit. This process includes enquiring about the individual's history of working with children. We require staff to provide proof of personal identity, and that they have appropriate qualifications for their roles, with regular compliance checks to ensure qualifications and clearances are valid. Proof of personal identity will include, to the extent it was not required to be provided to obtain a Working With Children Check, the provision of a certified copy of all new employees' and volunteers' passport, drivers licence or other acceptable form of photo identification to the People and Capability Manager.

Members of the MITS Board must also hold a valid Working With Children Check.

15 How does MITS support staff and volunteers to ensure child safe environments at MITS?

All MITS Board members, staff and volunteers are required to complete annual child safety training. Training records will be maintained by MITS.

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 Board members, 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, including grooming, 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;
- **(employee and volunteer support)** in supporting colleagues and peers who have reported a child safety incident;
- **(record keeping)** in MITS'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 Families Fairness and Housing (DFFH), the Commission for Children and Young People (the '**Commission**') and Victoria Police, depending on the severity and urgency of the matter. (This is in addition to and does not derogate from any mandatory reporting obligation.)

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

All reports of child abuse and child safety concerns, including any incidence of grooming 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.

Complaints

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 this Policy, 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 Families, Fairness and Housing 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 having unsupervised contact with children at MITS; and
- having their access to MITS's IT system and facilities removed.

To raise a complaint, you can also 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 when managing concerns. The decisions we make when recruiting, assessing incidents, and undertaking disciplinary action will always be thorough, transparent, and based on evidence.

Reporting

Reportable Conduct: Reportable Conduct of staff, volunteers and others should be reported in accordance with the Reportable Conduct Policy. ('**Reportable Conduct**' is defined in that policy.)

Failure to disclose: Reporting child sexual abuse is a community-wide responsibility. A person of or over the age of 18 years (whether in Victoria or elsewhere) who has information that leads the person to form a reasonable belief that a sexual offence has been committed in Victoria against a child under the age of 16 years by another person of or over the age of 18 years is required to disclose that information to a police officer as soon as it is practicable to do so, unless the person has a reasonable excuse for not doing so.

A reasonable belief is more than suspicion. There must be some objective basis for the belief. However, it is not that same as having proof and does not require certainty.

For example, a person is likely to have a reasonable belief if they:

- observed the conduct themselves;
- heard directly from a child that the conduct occurred; or
- received information from another credible source (including another witness).

A reasonable excuse includes:

- a reasonable fear for their own or another person's safety; or
- a reasonable belief that the information has already been disclosed to Victoria Police or DFFH Child Protection and the person has no new information to add to the disclosure.

The closest police station to MITS is at 217 Church Street, Victoria, (Phone: 13 1444 or 03 8420 3600).

MITS recognises the importance of encouraging individuals to disclose any concerns or suspicions of child abuse or neglect.

In addition to the mandatory reporting obligations in relation to Reportable Conduct and child sexual abuse discussed above, all staff members, volunteers, contractors and consultants are required to promptly report any disclosures or concerns regarding child abuse or neglect to one of MITS's designated Child Safety Officers.

MITS will ensure that individuals who make disclosures are treated with respect, sensitivity, including cultural sensitivity, and confidentiality, in accordance with relevant legislation and best practice.

The designated Child Safety Officer will follow appropriate procedures to address the disclosure, including reporting to the relevant authorities (in particular where there is a legal obligation to do so), ensuring ongoing cooperation by MITS with any law enforcement bodies, and providing necessary support to the affected individual.

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.

MITS is committed to taking immediate action to protect students and individuals from any potential harm or risk.

There are a number of factors that may assist in determining whether a risk is a substantial risk. These include:

- the likelihood or probability that the child will become the victim of a sexual offence;
- the nature of the relationship between a child and the adult who may pose a risk to the child;
- the background of the adult who may pose a risk to the child, including any past or alleged misconduct;
- any vulnerabilities particular to a child which may increase the likelihood that they may become the victim of a sexual offence;
- any other relevant fact which may indicate a substantial risk of a sexual offence being committed against a child.

Any staff member, volunteer, or contractor who becomes aware of a situation where a child's safety or well-being is at risk must promptly report it to one of MITS's designated Child Safety Officers.

MITs will ensure that individuals who make such a report are treated with respect, sensitivity, including cultural sensitivity, and confidentiality, in accordance with relevant legislation and best practice.

The designated Child Safety Officer will promptly investigate the situation, take appropriate action to ensure the safety of the child, report the incident to the relevant authorities as required by law and ensure the ongoing cooperation by MITs with any law enforcement bodies.

MITs will provide ongoing support and resources to affected individuals and their families to address the consequences of failure to protect incidents.

Actions that may be taken to reduce or remove the risk may include a staff member or volunteer:

- 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 having unsupervised contact with children at MITs; and
- having their access to the MITs's IT system and facilities removed.

Mandatory reporting: any personnel who are **mandatory reporters** must comply with their duties.

The Children, Youth and Families Act 2005 includes a legal requirement of certain groups of people to report a reasonable belief of child physical or sexual abuse to protective interveners being the Child Protection Services and Victoria Police.

All MITs Board members, staff members, volunteers, contractors and consultants are mandatory reporters and must promptly report any concerns or suspicions of child abuse or neglect to one of MITs's designated Child Safety Officers.

MITs acknowledges its legal obligation to report any reasonable belief or suspicion of child abuse, including physical or sexual abuse or neglect to the appropriate authorities.

All mandatory reporters must make a report on each occasion that they form a reasonable belief or suspicion of child abuse or neglect.

All mandatory reporters must make such a report as soon as is practicable.

All mandatory reporters must make a report even if members of the Executive Team or one of MITs's designated Child Safety Officers do not share their belief.

MITs will ensure that individuals who make such a report are treated with respect, sensitivity, including cultural sensitivity, and confidentiality, in accordance with relevant legislation and best practices.

The designated Child Safety Officer will ensure that all reports are made to protective interveners, being Child Protection Services and Victoria Police, in accordance with relevant legislation and will maintain confidentiality throughout the reporting process. The designated Child Safety Officer will also report the incident to the relevant authorities as required by law and ensure the ongoing cooperation by MITs with any law enforcement bodies.

MITs will provide regular training and resources to staff members, volunteers, and contractors to enhance their understanding of mandatory reporting obligations and procedures.

MITs is situated in the City of Yarra which is serviced by the North Division of Child Protection Services (Contact number 1300 598 521).

The closest police station to MITs is at 217 Church Street, Victoria, (Phone: 13 1444 or (03) 8420 3600)

We record all allegations of abuse and safety concerns using our Child Safety Reporting Template, including investigation updates. As soon as a person forms a reasonable belief that child abuse may occur or have occurred, the person must follow the processes summarised above. 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, insofar as permitted by relevant law.

We acknowledge that MITS's students, families and staff are culturally diverse, coming from around Australia and beyond, and representative of many different Indigenous communities, MITS will use all endeavours to ensure that any report received under this Policy is dealt with in as culturally safe a manner as possible for all parties involved. This will involve, at a minimum, doing our best to understand at the outset any cultural sensitivities of the parties to the report, and of the subject matter of the report itself, and if necessary seek advice in relation to the safest way to manage those sensitivities from MITS's stakeholders.

Fulfilling the roles and responsibilities in the Complaints Handling Policy does not displace or discharge any other obligations that arise if a person reasonably believes that a child has been abused or is at risk of child abuse.

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

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 and MITS's processes in this regard.

All child safety complaints, concerns, incidents and near misses will be recorded on MITS's IT systems. To the extent necessary, usually where an incident has occurred that needs to be mandatorily reported, this 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 all investigations, and the resolution of all 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 organisational 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.

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 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, contractors, consultants, 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 legal requirements, MITS's Privacy Policy and our Employee Records Policy.

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, save in the very limited circumstances and with the manager supervision set out in MITS's Employee Social Media and Social Contact Policy).

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.

Contractors, consultants or other service providers 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 we will require them to sign MITS's Child Safety Code of Conduct.

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 in paragraph 22). Potential breaches by anyone will be investigated and may result in restriction of duties, suspension or termination of employment or engagement or other corrective or legal action. More information can be found in our Complaints Handling Policy.

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.

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:

- this Child Safety Policy
- Child Safety Code of Conduct
- Student Health and Wellbeing Policy
- Reportable Conduct of Staff, Volunteers and Others 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

23 Supporting legislation

MITS takes its legal responsibilities seriously, including to be compliant with:

- 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
- Occupational Health and Safety Act 2005 (Vic)
- Equal Opportunity Act 2010 (Vic)
- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Disability Discrimination Act 1992 (Cth)

24 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 the Child Safety Policy at least every other year	Board	At least every other year
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

8	Support students' participation in the following ways: • Early in each school year, provide education and training for students on their rights in relation to child safety, and how to raise concerns and access support services. • Hold regular discussions between MITS teachers and boarding staff and students about child safety, including child-led conversations on what makes them feel safe and unsafe. • Consult with students about any proposed significant changes to the physical environment, policies, procedures, programs or staffing. Consider students' views in the decision-making process. • Provide information to students and families about MITS operations, staffing and programs suitable for different age groups and diversity of the students. • Child safety information sessions will be offered in language where needed. • Run a Student Representative Council, which considers all matters related to student experience at MITS, including child safety.	Executive Team All staff Executive Team Executive Team Executive Team	Annually Regularly As required As required As required Every term
8	Provide students with sexual harassment information and offer students access to sexual abuse prevention programs and associated information that are age appropriate.	Executive Team	Annually
9	From time to time, seek input from parents on matters relating to child safety, through surveys or direct contact.	Executive Team	As required

9	Provide 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 • 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.	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 and consultants to abide by the Child Safety Code of Conduct, and where they are engaging with children require them to sign an agreement to comply with the Code, prior to delivering any services	Anyone procuring services of a 3 rd party contractor	As required
13	Require a Working with Children Checks and referee statements (including enquiring about their history of working with children) for all staff and volunteers. Require staff to provide proof of personal identity, have appropriate qualifications for their roles and check regularly to make sure these qualifications are valid.	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 Check	People and Capability Manager	Prior to commencement of role as Director
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14	Provide all staff and volunteers with 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 and Child Safety Policy and all external reporting obligations (such as mandatory reporting);	Executive Team	Annually
	• (Complaints Handling Policy) in the execution of our Child Safety Complaint Handling Policy	Executive Team	On induction
	• (Reportable Conduct Policy) in the execution of our Reportable Conduct Policy	Executive Team	On induction
	• (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;	Executive Team	On induction
	• (children's rights) in the understanding of children's rights;	Executive Team	On induction
	• (Cultural safety) 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;	Executive Team	On induction
	• (Indigenous Culture) in the strengths of Indigenous cultures and its importance to the wellbeing and safety of Indigenous children;	Executive Team	On induction
	• (Diversity) in understanding diversity and how to support diversity and inclusion;	Executive Team	On induction
	• (record keeping) in MITS's record keeping and information sharing policies and processes; and	Executive Team	On induction
	• (risk assessment) in the development of their skills in risk assessment and management.	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	For documentation relating to the organisational response to child sexual abuse, retain: • 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	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 consultants or service providers 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 rd party services	As required
19	Review the child safety policies and procedures of third-party contractors and consultants to ensure compliance with child safety requirements and, if necessary, require them to sign MITS's Child Safety Code of Conduct	Procurer of 3 rd 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	Ensure that reviews cover: • 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	Executive Team	As required
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25 MITS Implementation of Child Safe Standards

Cultural safety for Aboriginal children	Where covered in MITS Child Safety Policy
Child Safe Standard 1: <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>	Paras 4, 10, 11, 12, 15
Describe strategies used by the organisation to create a culturally safe environment for Aboriginal children. Consider: How the organisation will describe its commitment to the cultural safety of Aboriginal children. • Outlining the key actions the organisation will take to create an inclusive and welcoming physical and online environment for Aboriginal children and their families. • 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. • How staff and volunteers will encourage and support children to express their culture and enjoy their cultural rights. • How the organisation will support and facilitate participation and inclusion within the organisation by Aboriginal children and their families. • What the organisation's approach is to racism. • How the organisation promotes the participation and inclusion of Aboriginal children and their families.	

A commitment to child safety and wellbeing	Where covered in MITS Child Safety Policy
Child Safe Standard 2: <i>Child safety and wellbeing is embedded in organisational leadership, governance and culture.</i>	Paras 4, 8, 13, 18, 19, 21, 21
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. Consider: • How the organisation will describe its commitment to child safety and wellbeing. • What the organisation's expectations and practices are about child safety and wellbeing and what the governance arrangements are to ensure this is achieved. • How leaders, staff and volunteers will champion a child safe culture and the expectations around child safety and reporting. • How and when leaders will monitor and review the organisation's performance in delivering child safety and wellbeing.	

• What should be in the organisation's Code of Conduct, who needs to comply with it, and what happens if a person breaches it. • What the organisation's approach is to record keeping and information sharing.	
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Taking child participation and empowerment seriously	Where covered in MITS Child Safety Policy
Child Safe Standard 3: <i>Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.</i>	Paras 9, 15
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. Consider: • How the organisation will educate and engage with children about their rights, safe environments and how to raise concerns and access support services. • Key processes or opportunities for children to participate in the organisation and contribute to decision-making. • Ways the organisation seeks the views of children and encourages their participation, including on safety and wellbeing issues. • 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. • Ways the organisation promotes friendships and peer support for children. • Whether sexual abuse prevention information will be offered to children.	

Involving families and communities	Where covered in MITS Child Safety Policy
Child Safe Standard 4: <i>Families and communities are informed and involved in promoting child safety and wellbeing.</i>	Paras 10, 11
Describe how the organisation puts into practice effective communication and participation strategies for engaging with, and responding to, the diversity of families and communities. Consider: • How families can participate in decisions that impact their child. • How families and communities are given information about the organisation's child safety and wellbeing policies.	

• How the organisation provides information about the organisation's governance and operations, complaints processes and disciplinary processes. • How the organisation seeks and responds to feedback from family and community members. • Ways the organisation seeks the input of families and communities on the organisation's approach to child safety and wellbeing. • How the organisation engages with families and communities to build cultural safety for children in the organisation.	
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Respecting equity and diversity	Where covered in MITS Child Safety Policy
Child Safe Standard 5: <i>Equity is upheld and diverse needs respected in policy and practice.</i>	Paras 9, 10, 11, 12, 15
Describe how the organisation creates an environment where children's diverse circumstances and needs are recognised, and all children feel safe, welcome and included. Consider: • How the organisation will describe its commitment to equity and inclusion. • 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. • 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. • How the organisation will respond to the needs of all children, with a particular focus on those experiencing vulnerability or disadvantage. • 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. • Training for staff and volunteers on identifying and responding to children with diverse circumstances and needs.	

Ensuring that staff are suitable and supported	Where covered in MITS Child Safety Policy
Child Safe Standard 6: <i>People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.</i>	Paras 14, 15
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.	

Consider: • How to describe the organisation's approach to recruitment, including advertising, position descriptions, selection criteria, pre-employment screening and referee checks. • How you will regularly check qualifications, Working with Children Check and other registration or ongoing screening checks remain valid. • 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. • The organisation's approach to supervision, support and performance management of staff and volunteers.	
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Child-focused complaint systems	Where covered in MITS Child Safety Policy
Child Safe Standard 7: <i>Processes for complaints and concerns are child-focused.</i>	Paras 16, 18, 19
Describe how the organisation ensures that it has accessible and responsive complaints management processes that are focused on the needs and rights of children. Consider: • 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. • 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. • The roles and responsibilities of staff and volunteers in the complaints process and how staff and volunteers should respond to children who disclose abuse. • The organisation's approach to privacy and confidentiality. • What must be reported to external authorities and how this should be done. • Record keeping and information sharing requirements. • What employment law obligations are relevant to complaint handling. • How the organisation will respond to concerns or complaints relating to abuse or harm caused to a child by another child. • What needs to be done to identify and respond to risks to the safety of children when a complaint or safety concern is raised. • What support is available to those making a complaint and those involved in the complaint process.	

Staff knowledge, skills and awareness	Where covered in MITS Child Safety Policy
Child Safe Standard 8: <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>	Para 15
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. Staff and volunteers need training and information on issues such as: • children's rights • the organisation's child safety and wellbeing policies and procedures • recognising signs of child abuse or harm • responding to disclosures • understanding and responding to harmful behaviours by a child towards another child • record keeping • risk assessment and management • external reporting obligations • creating culturally safe and inclusive environments and responding to racism. Consider: • How you will identify training needs for staff and volunteers and how you will record attendance. • How information will be made available to staff and volunteers and who is responsible for providing this. • How the organisation will provide support for staff and volunteers.	

Safe physical and online environments	Where covered in MITS Child Safety Policy
Child Safe Standard 9: <i>Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.</i>	Paras 16, 19
Describe how the organisation promotes child safety and wellbeing in physical and online environments in order to reduce the risk of harm. Consider: • How the organisation will develop and implement risk management plans. • How risk management plans will be informed by and responsive to the views of staff, volunteers, parents and carers and children. • How to minimise risks of child abuse and harm without compromising children's right to privacy, access to information, social connections and learning opportunities. • Online as well as physical environments.	

Any procurement by the organisation and how to ensure child safety and wellbeing when contracting third parties.	
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Review of child safe policies and practices	Where covered in MITS Child Safety Policy
Child Safe Standard 10: <i>Implementation of the Child Safe Standards is regularly reviewed and improved.</i>	Paras 8, 21
Describe how the organisation continues to reflect on and improve its child safety and wellbeing policies and practices. Consider: - How frequently this policy, and the organisation's other child safety and wellbeing policies and procedures, will be reviewed and who is responsible. - How you will make sure the organisation has fully implemented each of the Standards. - How the organisation engages children, families, communities, staff and volunteers in review processes and provides feedback on review outcomes. - How the organisation regularly analyses complaints, concerns, incidents or significant breaches of policy to identify causes or systemic weaknesses and implements improvements. - How you will tell the organisation's community about the findings and actions taken in response to reviews.	

Documenting policies and procedures	Where covered in MITS Child Safety Policy
Child Safe Standard 11: <i>Policies and procedures document how the organisation is safe for children and young people.</i>	Para 22
Describe how the organisation documents and makes available its policies and procedures for ensuring the safety and wellbeing of children. Consider: - 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). - 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. - How to make sure these documents are informed by stakeholder consultation. - How the organisation uses information from experts and other organisations to inform policies and procedures.	

• 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. • The expectations for leaders, staff and volunteers in complying with and implementing child safety and wellbeing policies and procedures.	
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