

**CHILD SAFE FRAMEWORK REPORT****PURPOSE**

To outline and summarise Ozford's Child Safe framework and practices, provide an overview of child safe issues and risks, and to provide implementation guidelines related to the Child Safe Standards and Ministerial Order No. 870 including the strategies to prevent or minimise risks to child abuse.

**BACKGROUND AND CONTEXT**

Ozford is committed to enabling all staff and students to work and study in a safe and secure environment free from safety hazards and risks, discrimination, victimisation, bullying, sexual harassment, vilification and the seeking of unnecessary information. Fostering such a safe and secure environment will be congruent with the provision of a supportive learning environment that values and embraces cultural diversity, where our students come from diverse cultural and socioeconomic backgrounds to interact with and experience each other's culture and so gain knowledge, skills and values from a range of cultures. Ozford has zero tolerance for child abuse.

The Child Safe Standards require Ozford to have strategies to embed a culture of child safety, including through effective leadership arrangements. Ministerial Order No. 870 places accountability for managing the risk of child abuse with a school's governing authority, for Ozford this is the Executive Management team. Under the Order, the Executive Management team must make sure that its members receive appropriate guidance and training about the Child Safe Standards on an annual basis.

All schools are expected to be compliant with the seven child safe standards outlined below:

**Standard 1:** Organisations must have strategies to embed an organisational culture of child safety, including through effective leadership arrangements.

**Standard 2:** Organisations must have a child safe policy or statement of commitment to child safety.

**Standard 3:** Organisations must have a code of conduct that establishes clear expectations for appropriate behaviour with children.

**Standard 4:** Organisations must have screening, supervision, training and other human resources practices that reduce the risk of child abuse by new and existing personnel

**Standard 5:** Organisations must have processes for responding to and reporting suspected child abuse.

**Standard 6:** Organisations must have strategies to identify and reduce or remove risks of child abuse.

**Standard 7:** Organisations must have strategies to promote the participation and empowerment of children.

This report which is prepared annually provides an provides the Executive team with an overview of how Ozford demonstrates its responsibilities in meeting the Victorian Child Safe Standards and Ministerial Order 870 – Child Safe Standards - Managing the risk of child abuse in schools. It also provides an evaluation of the effectiveness of Ozford's child safe practices and how Ozford is embedding a culture of child safety in the school.

Oxford's students are international senior High School students, who are from culturally diverse backgrounds, and this is always taken into account in the way Oxford delivers its education services. Because of this, Oxford's approach to developing its child safe practices and promotion for child empowerment and participation has a focus on international students.

In respect to the other aspects of the Principle of inclusion, while Oxford has an open enrolment policy, it has not recruited any students from aboriginal backgrounds. Oxford also does not currently have any students with disabilities but in developing its child safe practices considers the potential risks associated with students from such backgrounds.

In 2019, the college has a small number of students enrolled in Year 10, VCE and VCAL.

In respect to the College's reporting obligations has:

- Ensured staff and students are trained in the Oxford child safe practices. There have been no reported incidents of child abuse in its years of operation.
- Ensured staff are trained in mandatory reporting, child safe and Commission for Children and Young People (CCYP) reportable conduct requirements. There have been no reports in 2019 of this nature.

### **KEY FEATURE 1: STRATEGIES TO EMBED AN ORGANISATIONAL CULTURE OF CHILD SAFETY**

Underpinning Oxford's commitment to implement the seven standards for child safety as outlined in the Ministerial Order No. 870 is a suite of policies and procedures comprising, but not limited to;

1. Child Safety Policy & Procedures
2. Child Safe Risk Management Policy and Procedures
3. Mandatory Reporting Policy and Procedures
4. Responding to and reporting allegations of suspected child abuse Policy and Procedures
5. Critical Incident policy and Procedure
6. Student Support and Services Policy & Procedures
7. Student Code of Conduct Policy and Procedure
8. Younger Student Policy and Procedures
9. Homestay Policy and Procedures
10. Complaints & Appeals Policy and Procedure
11. Human Resources Policy and Procedure
12. Student Behaviour Management Policy and Procedures
13. Building Supervision Policy and Procedures
14. Excursion Policy and Procedures
15. Anti-Discrimination Policy and Procedure
16. Anti—Bullying & Harassment Policy and Procedure
17. Diversity and Equity Policy and Procedure

Strategies that are currently in place to address the issue of child safety in accordance to the college's policies and practices are also outlined and incorporated in the above policies and procedures which are implemented at different stages of student life cycle. The Oxford policies also allocate roles and responsibilities for achieving the strategies. Refer to Appendix 1 for further details on the relevance of the above policies and procedures to Child Safe.

Oxford recognises that staff play an important role in upholding Oxford's child safe practices. Oxford's staff are well trained and experienced in dealing with this cohort of students.

The Department of Education and Training resources including resources from the PROTECT websites have been used to inform students and their parents about the Victorian Child Safe Standards and Oxford's child safe practices.

<https://www.education.vic.gov.au/school/teachers/health/childprotection/Pages/default.aspx>

Oxford has communicated its child safe policies and strategies to its community including staff students and parents in the following manner:

- A copy of the Oxford child safe policies including allocated roles and responsibilities on its website that are accessible to all new and prospective staff and students and their families.
- Oxford promotes child safety in the Oxford classrooms and main common areas using the DET Protect resources.  
([https://www.education.vic.gov.au/Documents/about/programs/health/protect/ChildSafeStandards\\_Poster.pdf](https://www.education.vic.gov.au/Documents/about/programs/health/protect/ChildSafeStandards_Poster.pdf))
- Oxford has included a child safety message in its marketing materials including the Pre-enrolment guide and Student handbook
- Oxford has promoted its child safety practices in communications with parents by website and annual report
- Oxford has promoted its child safety practices to staff through staff induction and annual training and professional development.

#### **During recruitment and induction of new students**

While the child safe policies are accessible on the website, to improve its child safe practices Oxford's marketing materials have been updated in 2019 to include its commitment to safety and that Oxford has zero tolerance of child abuse. The child safety information is now in the Oxford pre-enrolment materials and student handbook that are available on the Oxford website.

In the recruitment process, all students recruited must make a declaration that they have not been convicted of any crime or offence in any country as a condition of enrolment.

New students are provided with a compulsory orientation and transitional program. The orientation and transitional program at Oxford plays a key role in introducing and immersing the students to the different aspects of living in Australia including social norms and general acceptable behaviors and expectations when living in Australia. Some of the child safety-related topics covered in the program include:

- Student Code of Conduct – explanations on expected and acceptable conducts at the College
- A presentation that includes a dedicated section on various safety Issues (campus, personal travel, family etc.) and where to get help and support when required. This information is also available in the Student Handbook.

All students are informed in a culturally appropriate manner about Oxford's child safe practices and advised where they can access the Oxford policies and procedures during orientation and Mentor sessions.

Students receive appropriate child safe education through their studies about:

- standards of behaviour for students attending the school;
- healthy and respectful relationships (including sexuality);
- resilience; and
- child abuse awareness and prevention.

The Student Handbook has a section on child safe and for 2019 this been updated with a dedicated section to promote the range of currently available information for students about Child Safety.

### **Ongoing monitoring of living suitability and welfare arrangement (CAAW)**

For students that Ozford has taken CAAW responsibility, Ozford has policies and procedures in place to cover all regulatory student care, welfare, and living matters.

All homestay hosts/care givers receive training in the Ozford policies and act in support of Ozford in its non-delegable role of ensuring the suitability of and monitoring the student's welfare and accommodation. Where Ozford uses outsourced homestay recruitment companies, Ozford also ensure that the staff that may interact with students are provided with this training.

The student support staff meet on a regular basis with individual younger students and with parents/homestay hosts/care givers. If they raise any issues of concern, they are addressed promptly in accordance with the Ozford policy and procedures.

For 2019, the issues discussed with care givers and homestay providers have included:

- Students want to undertake activities after hours or during school holidays that have not been organised by Ozford. The caregivers requested some additional support in determining if the activity was safe.

For 2019, the issues raised by students included:

- One of the students raised that they had been uncomfortable from the way a person spoke to them on public transport.

As a result of this feedback, Ozford has:

- Provided care givers and homestay providers with advice on examining student activities that have not been organised by Ozford
- Provided students with Public Transport safety guide and how to seek help if students feel unsafe on public transport.

### **Ongoing Support and Programs to minimise risks.**

Students have access to dedicated student services or welfare staff in addition to their subject teachers and the Coordinator who they can speak to if they have any concerns. All students participate in weekly Mentor sessions with the senior teaching staff and any issues of concern are referred to the Ozford Management team.

There is a no-alcohol rule on campus apply to both staff and students.

Teaching staff are rostered for oversight duty during class breaks and available to discuss any concerns.

In 2019, Ozford is holding targeted sessions to support and explain Ozford's child safe practices and the welfare support and well-being arrangements in place to promote child empowerment. Some of the child safe risks being covered include:

- Respectful behaviours between students
- Age of consent
- For students over 18 year old – training on their child safe obligations

Ozford also works in partnership with other external agencies including the Victoria Police and Study Melbourne Centre to strengthen the awareness of wider student safety issues.

### **Allocated Roles and Responsibilities for Achieving the Strategies**

The Child Safe Standards require schools to have strategies to embed a culture of child safety, including through effective leadership arrangements.

The Ministerial Order places accountability for managing the risk of child abuse with the school governing authority, the Executive Management team. This means the Executive Management team is responsible for developing and endorsing the school's child safety policies and practices. The Executive Management team must also ensure that the school is taking the necessary steps to embedding an organisational culture of child safety. The school's child safe policies also set out the responsibilities for all staff as defined by MO 870.

The Executive Management team must also make sure that its members receive appropriate guidance and training about the Child Safe Standards. The guidance and training must cover:

- individual and collective obligations and responsibilities for managing the risk of child abuse
- child abuse risks in the school environment
- the school's strategy and approach to implementation of the child safe standards.

Oxford's Executive Management Team have responsibility for oversight of and monitoring of child safe risks and reviewing the approach to the management of risks in the school's environments which include the interaction with staff, interaction between students, the campus, the online environment, offsite science class rooms, external facilities used for recreational, educational and sporting activities and camps.

For students that Oxford has taken CAAW responsibility for, Oxford also has responsibility for all child safe risks associated with their welfare and accommodation including carer/homestay arrangements and all environments that the student may interact with out of school hours. The only time that Oxford does not have responsibility is when CAAW students reside with their parents.

Oxford's Governance Charter has incorporated this into the governing member's responsibility and workplan is developed in accordance to the list of responsibilities assigned to the governing authority.

Each policy and subsequent procedure has a responsible officer who is allocated to take responsibility to implement, monitor and review the effectiveness of the policy and procedure.

Each policy and procedures has a policy scope to ensure those who might be affected by a policy are identified, considered, and consulted. Queries, feedback or comments about a policy are to be referred to the listed Responsible Officer.

The framework applies to all staff: Staff is defined very broadly under the MO870 and includes Oxford governing members, staff, voluntary position holders, students, and volunteers at all times whilst engaged in Oxford's business or otherwise representing Oxford that may interact with students in any manner in online or physical environments. This encompasses visitors, affiliates, contractors and consultants, appointed or engaged by the College, to perform functions and/or recognised for their contribution to the College and other persons that students may interact with such as on educational and sporting activities.

## **KEY FEATURE 2: A CHILD SAFETY POLICY OR STATEMENT OF COMMITMENT TO CHILD SAFETY**

Oxford's Child Safety Policy, originally developed and implemented in 2016 has undergone several reviews and the current version is available on Oxford's website.

The Child Safe framework has been developed to provide a summary on how Oxford demonstrates its responsibilities in meeting the Victorian Child Safe Standards and Ministerial Order 870 – Child Safe Standards - Managing the risk of child abuse in schools. The policy outlines Oxford's zero tolerance to child abuse and its commitment to embed a culture a child safety in the school community.

### **KEY FEATURE 3: A CHILD SAFETY CODE OF CONDUCT**

Oxford's Child Safety Code of Conduct applies to all all staff, volunteers, contractors, parents/ guardians/ care giver/homestay and any other member of the school community involved in child-related work with students. It establishes clear expectations for appropriate behaviour with children.

It provides guidelines on appropriate and inappropriate behaviour with children to help protect children from abuse.

### **KEY FEATURE 4: COMMUNICATION OF CHILD SAFETY POLICIES AND PROCEDURES, PRACTICES AND ALLOCATED ROLES AND RESPONSIBILITIES TO SCHOOL COMMUNITY**

All Child Safe related policies, procedures and processed are available on the College's websites. School community are made aware of the information during student enrolment, staff induction and PD/workshops. The staff also has access to a dedicated Moodle section that includes this information.

#### **Engagement and Communication with the School Community**

Oxford students are informed about Oxford's child safe practices and receive appropriate education about:

- standards of behaviour for students attending the school;
- healthy and respectful relationships (including sexuality);
- resilience; and
- child abuse awareness and prevention.

Information about Oxford's child safe practices and the Victorian Child Safe Standards more broadly is supplied during orientation and staff make students aware that all the policies are on the Oxford website.

Staff members have an important role in informing students about Oxford's child safe practices. The information is supplied during orientation and staff ensure that students are aware that all the policies are on the Oxford website. Oxford students meet with their Mentor weekly and any matters pertaining to welfare and wellbeing may be raised during the sessions.

Staff have been informed about Oxford's child safe practices during induction and it is compulsory for staff to undertake the mandatory reporting online training. In addition, staff must sign the Code of Conduct which outlines the standards of behaviour that are expected of Oxford employees in the performance of their duties and provides guidance in areas where employees need to make personal and ethical decisions. Oxford's staff are also made aware at induction that all policies and procedures are on the Oxford website.

The Homestay Agency/Supplier, Homestay hosts and carers are informed about Oxford's child safe practices and policies (annually) and providers are also made aware that this information is available on the website.

Oxford also acknowledges that child safety is an issue that has society wide implications and requires various levels of government, communities, and education providers working in partnership to improve student awareness and reduce the risks of child abuse. Oxford also utilises external resources

from local council, police, Independent Schools Victoria Association, VRQA and other agencies to promote and strengthen Child Safety.

### **Student Participation and Empowerment**

Oxford students are predominantly international students from culturally and linguistically diverse backgrounds and Oxford has taken this into account in the way it promotes child empowerment and participation. In particular, Oxford has used the Department of Education and Training resources in informing students about its child safe practices.

Oxford students meet with their Mentor weekly and any matters pertaining to welfare and wellbeing may be raised during the sessions.

The student services and welfare staff meet on a regular basis with individual students and with parents/homestay hosts/care givers. If they raise any issues of concern, they are addressed promptly in accordance with the Oxford policy and procedures.

### **KEY FEATURE 5: RESPONDING TO ALLEGATIONS OF SUSPECTED CHILD ABUSE**

The Mandatory Reporting Policy and Procedures and the Responding to and Reporting Allegations of Suspected Child Abuse Policy and Procedures have been developed to ensure that Oxford provides appropriate response to and reports allegations of suspected child abuse and meets its CCYP reporting obligations.

The Oxford Executive team have responsibility for ensuring there is a culture that encourages reporting. All staff are trained in their responsibilities and know that the Oxford Executive team are available to help them with understanding their obligations and will assist them in making a report.

Oxford respects the right of the staff member to make a report if they believe it is required.

Oxford also promotes its policies on the website which include how a member of the wider community may contact Oxford if they have a concern. Oxford has not received any such reports to date.

### **KEY FEATURE 6: STRATEGIES TO IDENTIFY AND REDUCE OR REMOVE RISKS OF CHILD ABUSE**

Oxford has developed a Child Safety Policy and Procedures and a Child Safe Risk Management Policy and Procedures that identify the potential risks of child abuse in its environments.

The Child Safe Risk Management Policy and Procedures have been approved by the Executive Management team and include a child safe risk register that details the school's risks and mitigating controls including:

- staff delivering education services
- visitors and other occupants of the building
- interaction between students including students that are 18 years of age
- the campus
- online environments
- the offsite science classrooms
- the external facilities used for recreational, educational and sporting activities
- The excursions and trips
- the school camps.
- For students that Oxford has taken CAAW responsibility for:

- welfare and accommodation including carer/homestay arrangements and all environments that the student may interact with out of school hours including during school holidays and term breaks where they do not reside with their parents..

The Executive management team has responsibility for reviewing the risk profile to ensure that it includes all situational child abuse risks and monitoring the effectiveness of the controls as outlined in the policy.

In early 2018, Ozford in response to the revised VRQA Guideline for younger students, reviewed and enhanced the child abuse risks and the risk controls surrounding students that Ozford has taken CAAW responsibility. The controls were reviewed in 2019 and based on feedback from student and carers/homestay providers strengthened in the area of activities completed by students after hours.

As previously noted, Ozford ensures that all Executive management team members and staff are trained in their responsibilities and obligations. The guidance and training covers:

- individual and collective obligations and responsibilities for managing the risk of child abuse
- child abuse risks in the school environment
- the school's strategy and approach to implementation of the child safe standards.

The training is conducted in annually. This year, the training is planned for August 2019.

#### **KEY FEATURE 7: REVIEW THE EFFECTIVENS OF THE STRATEGIES**

Ozford is committed to upholding child safety and student safety. Relevant policies, procedures and systems are reviewed and updated regularly.

To ensure that this framework and its associated policies and procedures are fit for purpose and meet the requirements of the Child Safe Standards, they will be:

- reviewed and approved by the Executive Management Team on development or future review;
- internally reviewed by the Responsible Officer every three years from the date of approval (if not earlier);
- referenced to the applicable Child Safe Standards and/or other legislation/regulation.

#### **Review and Evaluation Process**

This report confirms that systems and processes that are in place to respond to and to prevent, to strengthen the reporting of and response to incidents affecting student safety are reviewed on a regular basis. However, feedback or comments on all related policy and procedures are welcomed by the listed responsible officer.

Identified Control and Continuous Improvement Action - At the request of EMT members after a review in 2019, this report on Ozford's Child Safe Framework was developed to supply the members with an overarching summary document to provide a comprehensive overview and to improve communication and raise awareness within the School community. It is planned that this report will be prepared annually.

#### **KEY FEATURE 8: SCHOOL STAFF SELECTION, SUPERVISION AND MANAGEMENT PACTICES FOR A CHILD-SAFE ENVIRONMENT**

The Human Resource Policy ensures that applicants for jobs that involve child-connected work for Ozford will be screened for child suitability work and informed about the school's child safety practices (including the code of conduct).

Staff recruited are subject to child safe screening including:

- An interview to confirm suitability for child connected work
- Evidence of personal identification to confirm the identity of the person (and that the name is consistent with the other documentation)
- Evidence of a valid Working with Children Check (WWCC) before the commencement of employment. The WWCC is validated by Ozford to confirm it is current using the online WWCC verification tool
- Checking of character references for suitability for child connected work

The Human Resources Policy and procedures ensures all new staff are provided with an induction program. Staff will be informed about the College's expectations and staff's duty of care towards students especially in the area of student care and wellbeing. The induction includes ensuring that staff understand that Ozford has zero tolerance for child abuse.

Staff will be informed about Ozford's child safe practices and that they are required to undertake the mandatory reporting online training. In addition, staff must sign the Child Safe Code of Conduct which outlines the standards of behaviour that are expected of Ozford employees in the performance of their duties and provides guidance in areas where employees need to make personal and ethical decisions.

Ozford's staff are also made aware at induction that all policies and procedures are on the Ozford website.

Teaching staff are rostered for oversight duty during class breaks and available to discuss any concerns.

Update sessions are held to support and explain Ozford's child safe practices and arrangements in place to promote child empowerment.

### **IMPLICATIONS: LEGAL OR FINANCIAL RISKS**

A failure to implement and monitor the child safety system may result in the occurrence or recurrence of preventable issues, potential child abuse incidents, negative impacts on student wellbeing and learning experiences, and potential reputational risks.

### **RECOMMENDATIONS**

The report is a summary from Ozford's governing authority (EMT) as to how Ozford is addressing the issue of the prevention of sexual assault and sexual harassment at the College.

It is recommended that the EMT note the current systems and processes that are in place to strengthen child safe culture at the College.

It is recommended that the EMT endorse this report to be presented to the stakeholder as a Student Safety Framework and to VRQA to note the discussion and review process undertaken by Ozford in relation to Child Safety as part of VRQA 2019 School review process.

Prepared by: Head of Student Services and Administration – Christine Chua

Date: 4 June 2019

**Attachments:**

**Appendix 1**

Relevance of Policies to Child Safe Standards	
Policy and Procedures	Relevance
1. Child Safety	The policy outlines Ozford's zero tolerance to child abuse and its commitment to embed a culture of child safety in the school community.
2. Child Safe Risk Management	This policy and procedure was developed to ensure Ozford has appropriate child safe risk management practices
3. Mandatory Reporting	This policy and procedure was developed to ensure Ozford staff members meet the Mandatory Reporting obligations
4. Responding to and reporting allegations of suspected child abuse	This Policy and Procedures was developed to ensure that Ozford provides appropriate responses to and reports allegations of suspected child abuse.
5. Critical Incident	This policy will ensure that Ozford has: <ul style="list-style-type: none"> <li>- an effective approach in response to critical incidents as they occur;</li> <li>- appropriate support and counselling services available to those affected;</li> <li>- appropriate training and information resources provided to staff.</li> </ul>
6. Student Support and Services	Consistent with the Mission and Values of the College and consistent with the Standard 6 of the National Code 2018, which specifies that providers are responsible for providing access to certain services to ensure the mental and physical wellbeing of their overseas students.
7. Student Code of Conduct	The Student Code and Conduct provides the framework and clarifies the standards of conduct that are expected of students.
8. Younger Student	This policy has been developed to meet the requirements of the National Code 2018 Standard 5, where students under the age of 18 are not being cared for in Australia by a parent or suitable nominated relative; Ozford must ensure the arrangement made to protect the personal safety and social well-being of those students are appropriate.
9. Homestay	This policy and procedures has been developed to ensure that the proposed arrangements for the accommodation, support and welfare of those students under 18 years of age are safe and suitable. The proposed homestay arrangements organized by Ozford are safe and suitable.

10.Complaints and appeals	Covers all forms of student complaints and appeals in relation to the operations of the College that may include, but are not limited to the quality of the teaching, administration, student support and services, bullying, harassment, discrimination and any other areas of perceived inappropriate, unfair or discriminatory treatment, action or decision.
11. Human Resources	This policy was developed to ensure the College recruit appropriately skilled, qualified and competent staff able to fulfil the College’s mission and Vision.
12. Student Behaviour Management	This policy and procedure has been developed to outline Ozford’s commitment in promoting a consistent and fair approach to student discipline.
13. Building Supervision	This policy and procedure has been developed to ensure Ozford has proper arrangements for on-site supervision of students
14. Excursion	This policy and procedure has been developed to ensure Ozford College has: <ul style="list-style-type: none"> <li>- an effective approach in response to accident/ incidents as they occur;</li> <li>- appropriate support and counselling services available to those affected;</li> <li>- appropriate training and information resources provided to staff.</li> </ul>
15.Anti-Discrimination	To ensure the workplace provides a fair and supportive environment free from all forms of discrimination, discriminatory practice and beliefs, that promotes personal respect, values diversity, and provides physical and emotional safety
16. Anti—Bullying & Harassment Policy and Procedure	To provide a fair and supportive environment free from all forms of bullying and harassment, that promotes personal respect and respect for others, as well as providing physical and emotional safety for all.
17.Diversity and Equity Policy and Procedure	To articulate and support the ongoing commitment of the College to promoting and providing all current and prospective students and staff with conditions of access to and participation in higher education based on equal opportunity, cultural diversity and academic freedom.