Juniper College Child Safety and Wellbeing Policy

Juniper College is committed to providing a safe, inclusive and supportive environment for all children and young people. We have zero tolerance for child abuse, harm, neglect, discrimination and racism. Our community works together to promote the rights of all children and young people to feel safe, be safe, respected and heard.

We are committed to creating a child-safe culture in which children and young people are empowered to participate in decisions that affect them and are supported to raise concerns or seek help. Particular attention is given to the safety, inclusion and wellbeing of Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disability, LGBTIQA+ young people, children who are unable to live at home, and children experiencing vulnerability or disadvantage.

All concerns, disclosures, allegations, incidents or suspicions relating to child safety or wellbeing are taken seriously and responded to promptly. Juniper College acts in accordance with its Child Safety Reporting Procedure, Child Safety Code of Conduct, the Victorian Government PROTECT framework and all applicable legal and regulatory reporting obligations.

The safety and wellbeing of children and young people is the first priority in all decisions and actions taken by Juniper College.

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Purpose

This policy sets out Juniper College's commitment, governance arrangements, systems and responsibilities for creating and maintaining a child-safe environment and promoting the safety and wellbeing of all children and young people.

The policy supports Juniper College's compliance with applicable child safety legislation, regulatory requirements and guidance, including:

- Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises;
- the Child Wellbeing and Safety Act 2005 (Vic);
- the Education and Training Reform Act 2006 (Vic);
- Victoria's Child Safe Standards;
- the Reportable Conduct Scheme; and
- the Victorian Government PROTECT framework and Four Critical Actions for Schools.

This policy establishes the overarching framework through which Juniper College prevents and manages risks to child safety and wellbeing, promotes a child-safe culture, supports the participation and empowerment of children and young people, and ensures that concerns about child abuse or harm are identified and responded to appropriately.

The Foundation Learning Centre Board, as the governing authority and proprietor of Juniper College, is the overall custodian of Juniper College's child safety policy framework. The Board retains ultimate oversight of the College's compliance with the Child Safe Standards and Ministerial Order No. 1359. Operational implementation of the framework is delegated to the Principal and relevant College leaders.

This policy must be read and applied in conjunction with the Juniper College Child Safety Reporting Procedure and Child Safety Code of Conduct. The Child Safety Reporting Procedure sets out the specific actions and reporting pathways that must be followed when a child safety concern, disclosure, allegation, incident or suspicion arises.

Scope

This policy applies to all Juniper College employees, including teachers, wellbeing staff, learning support officers and administrative and support staff, as well as volunteers, contractors, external providers, members of the Foundation Learning Centre Board, School Council members and students on placement.

It applies in all physical and online environments connected with Juniper College, including College campuses and offices, digital platforms and online learning environments, excursions and camps, College-arranged transport, community-based learning, VET and Structured Workplace Learning placements, and any other school-endorsed activity or location.

This policy also applies, where relevant, to conduct by an adult engaged by Juniper College that occurs outside the College environment or outside the person's ordinary work duties where that conduct may affect the safety or wellbeing of a child, the person's suitability to work with children, or Juniper College's child safety obligations.

For the purposes of this policy, a child or young person is a person under 18 years of age. Where an enrolled student is 18 years of age or older, Juniper College will continue to respond to safety and wellbeing concerns in accordance with applicable duty of care, criminal, family violence, wellbeing, complaints and information-sharing requirements.

This policy forms part of Juniper College's broader child safety framework and must be read and applied in conjunction with the Child Safety Reporting Procedure and Child Safety Code of Conduct.

Definitions

The following terms and definitions align with terminology used in the Victorian Government's Child Safe Standards, relevant legislation, regulatory schemes and guidance to support consistency and clarity across Juniper College's child safety framework.

- **Adult engaged by Juniper College:** An employee, volunteer, contractor, office holder, School Council member, student on placement, labour-hire worker, allied health provider or other adult engaged to provide services for or on behalf of Juniper College.
- **Child or young person:** A person under 18 years of age.
- **Child abuse:** Includes any act committed against a child involving a sexual offence or grooming, the infliction of physical violence or serious emotional or psychological harm, and serious neglect of a child.
- **Child-connected work:** Work authorised by Juniper College that is performed by an adult in a school environment while children are present or reasonably expected to be present.
- **Child-related work:** Work that falls within the meaning of child-related work under the Worker Screening Act 2020 (Vic), including paid or voluntary work involving or likely to involve direct contact with a child within a prescribed occupational field.
- **Child safety:** Includes protecting children from child abuse and harm, managing risks to child safety, supporting children who may be at risk, and responding appropriately to concerns, suspicions, incidents, disclosures or allegations involving child abuse or harm.
- **Child Safety Officer:** The Deputy Principal, who coordinates Juniper College's internal response to child safety concerns and supports implementation of the Child Safety Reporting Procedure.
- **Contractor:** A person or organisation engaged to perform work or provide services for or on behalf of Juniper College. Contractors must comply with applicable screening requirements and Juniper College's child safety policies, procedures and Code of Conduct.
- **Foundation Learning Centre Board:** The proprietor and governing authority of Juniper College and the overall custodian and approval authority for the College's child safety policy framework.
- **Head of Organisation:** The person formally nominated by Juniper College to fulfil the obligations of the Head of Organisation under the Reportable Conduct Scheme.
- **Juniper College School Council:** The College-level governance body that supports local oversight, monitoring and consultation in accordance with the governance responsibilities delegated to it by the Foundation Learning Centre Board.
- **Mandatory reporter / Mandatory reporting:** A mandatory reporter is a person prescribed under the Children, Youth and Families Act 2005 (Vic) who is legally required to make a report to DFFH Child Protection when the statutory reporting threshold is met. A mandatory reporter must make their own report and cannot transfer their legal reporting obligation to another person. Current reporting requirements and pathways are set out in the Child Safety Reporting Procedure.
- **Parent/carer:** A child's parent, guardian or other person who has formal responsibility for the child's care and wellbeing.
- **Reasonable belief:** A belief based on facts that would lead a reasonable person to believe that abuse or reportable conduct may have occurred. A reasonable belief does not require proof or certainty. Different legal reporting obligations may apply different reporting thresholds.

- **Reportable allegation:** An allegation about an adult worker or volunteer for which a reasonable belief has been formed that reportable conduct may have occurred.
- **Reportable conduct:** Conduct covered by Victoria's Reportable Conduct Scheme, including:
    - a sexual offence committed against, with or in the presence of a child;
    - sexual misconduct committed against, with or in the presence of a child;
    - physical violence committed against, with or in the presence of a child;
    - behaviour that causes significant emotional or psychological harm to a child; or
    - significant neglect of a child.

  Reportable allegations are managed and notified to the Social Services Regulator by Juniper College's nominated Head of Organisation in accordance with the Reportable Conduct Scheme and the Child Safety Reporting Procedure.
- **School environment:** Any physical, online or virtual place made available or authorised by Juniper College for use by a child, including College campuses, digital and online learning environments, excursions and camps, College-arranged transport, VET and Structured Workplace Learning placements, community-based learning and other school-endorsed activities or locations.
- **School staff:** An individual employed or otherwise engaged by Juniper College to work in a school environment, including persons contracted to perform child-related or child-connected work.
- **Student:** A person enrolled at or attending Juniper College. For the purposes of statutory child protection and child safety obligations, a child or young person is a student under 18 years of age. Where an enrolled student is aged 18 years or older, Juniper College continues to respond in accordance with applicable duty of care, criminal, family violence, wellbeing, complaints and information-sharing requirements.
- **Third-party provider:** An external organisation or individual engaged by Juniper College to provide programs, instruction, supervision or services to students, including VET providers, excursion providers, agency staff, allied health professionals and other contracted service providers.
- **Volunteer:** A person who performs work for Juniper College without remuneration or reward. Volunteers must comply with applicable screening requirements and Juniper College's child safety policies, procedures and Code of Conduct.

Policy Statement of Commitment to Child Safety

Juniper College is committed to creating and maintaining a child-safe culture in which the safety, wellbeing, rights and best interests of children and young people are embedded in our leadership, governance, policies, practices and everyday interactions.

Juniper College has zero tolerance for child abuse, harm, neglect, discrimination and racism. We actively identify, assess and manage risks to child safety and take all concerns, disclosures, allegations, incidents and suspicions seriously. Responses are timely, child-centred, culturally safe, trauma-informed and appropriate to the individual needs and circumstances of the child or young person.

We recognise and respect the diversity of our students and are committed to providing an inclusive environment in which every child and young person feels safe, valued, respected and heard. Particular attention is given to the safety and wellbeing of Aboriginal and Torres Strait Islander children and young people, children from culturally and linguistically diverse backgrounds, children with disability, LGBTIQA+ young people, children who are unable to live at home, and children and young people experiencing vulnerability or disadvantage.

Children and young people are supported to understand their rights, participate in decisions that affect them, raise concerns and access help. Their views are taken seriously and considered in decisions affecting their safety and wellbeing.

All adults engaged by Juniper College share responsibility for maintaining a child-safe environment and are expected to understand and comply with the Child Safety Code of Conduct, this policy and other applicable child safety requirements. Concerns about child abuse or harm must be acted upon promptly and managed in accordance with the Child Safety Reporting Procedure, the Victorian Government PROTECT framework, and applicable legal and regulatory reporting obligations.

The safety and wellbeing of children and young people is the paramount consideration in all child safety decisions and actions taken by Juniper College.

Roles and Responsibilities

Child safety is a shared responsibility across Juniper College. All persons covered by this policy must understand and fulfil the responsibilities relevant to their role and must act promptly when a child safety concern arises. Internal consultation, notification or escalation does not replace or delay any individual obligation to report to an external authority.

Foundation Learning Centre Board

The Foundation Learning Centre Board is the overall custodian of Juniper College's child safety policy framework and retains ultimate governance oversight of the College's implementation of the Child Safe Standards and Ministerial Order No. 1359.

The Board will:

- endorse and approve the Child Safety and Wellbeing Policy, Child Safety Reporting Procedure and Child Safety Code of Conduct;
- ensure appropriate governance arrangements, resources and accountability mechanisms are in place;
- receive appropriately de-identified reporting regarding significant risks, incidents, trends, reviews and improvement actions;
- monitor the College's implementation of the Child Safe Standards;
- ensure identified systemic risks and compliance gaps are addressed;
- ensure Board members receive appropriate annual child-safety training;
- review the effectiveness of the College's child safety framework at least annually; and
- approve substantive amendments to the child safety policy suite.

The Principal

The Principal provides organisational leadership and oversight of Juniper College's child safety framework and is responsible for ensuring that systems, resources and governance arrangements are in place to support compliance with the Child Safe Standards, Ministerial Order 1359 and other applicable child safety obligations.

The Principal will:

- ensure this policy, the Child Safety Reporting Procedure and the Child Safety Code of Conduct are implemented consistently across the College;
- ensure immediate risks to children and young people are appropriately managed;
- ensure appropriate resources, training and systems are available to support child safety;
- oversee the management of significant child safety risks and critical incidents;
- coordinate liaison with authorities where appropriate;
- oversee parent or carer communication where appropriate and safe;
- ensure accurate, contemporaneous and secure child safety records are maintained;

- ensure significant child safety risks, incidents, trends and compliance matters are reported in an appropriately de-identified form to the Foundation Learning Centre Board and, where appropriate, the Juniper College School Council;
- implement the child safety policy framework approved by the Foundation Learning Centre Board and provide assurance to the Board regarding its operation and effectiveness;
- support regular review of the College's physical, online and off-site environments and child safety risk controls; and
- ensure child safety policies, procedures and practices are regularly reviewed and improved.

The Principal fulfils the statutory responsibilities of the Head of Organisation under the Reportable Conduct Scheme only where formally nominated to that role. Internal notification to the Principal must not delay any report that is required to be made to Victoria Police, DFFH Child Protection, the Social Services Regulator or another relevant authority.

The Deputy Principal

The Deputy Principal serves as Juniper College's Child Safety Officer and coordinates the College's internal response to child safety concerns.

The Deputy Principal will:

- act as a key point of contact for staff, students, families, volunteers and contractors regarding child safety concerns;
- provide guidance to staff on the application of the Child Safety Reporting Procedure and the Victorian Government PROTECT framework;
- coordinate the College's internal response to disclosures, allegations, incidents, suspicions and other child safety concerns;
- ensure immediate and ongoing safety and support needs are considered;
- support staff to identify and complete the appropriate PROTECT documentation;
- coordinate safety, wellbeing and support planning for affected students;
- support appropriate referrals and follow-up;
- escalate relevant matters to the Principal and nominated Head of Organisation;
- support the maintenance of accurate and secure child safety records;
- coordinate and support child safety training, communication and awareness;
- contribute to the identification, assessment and review of child safety risks;
- support the review and continuous improvement of child safety policies, procedures and practices; and
- promote accessible, culturally safe and developmentally appropriate pathways for students to raise concerns and seek support.

The Deputy Principal's involvement does not replace an individual staff member's obligation to make an external report where required.

Head of Organisation

The person formally nominated by Juniper College as the Head of Organisation is responsible for fulfilling the College's obligations under the Reportable Conduct Scheme.

The Head of Organisation will:

- assess whether the reasonable-belief threshold for a reportable allegation is met;
- notify the Social Services Regulator of reportable allegations within required timeframes;

- ensure required investigations are appropriately conducted;
- provide required information, updates, findings and proposed actions to the Social Services Regulator;
- ensure appropriate action is taken in response to findings; and
- ensure Juniper College maintains systems and records necessary to meet its obligations under the Reportable Conduct Scheme.

The Head of Organisation role is distinct from the role of Principal unless the Principal has been formally nominated as the Head of Organisation.

Chair of Foundation Learning Centre Board

The Chair of the Foundation Learning Centre Board has a specific governance and escalation role where a child safety allegation or concern involves the Principal or nominated Head of Organisation.

The Chair of the Foundation Learning Centre Board will:

- receive and appropriately respond to allegations involving the Principal or nominated Head of Organisation;
- ensure the matter is not referred back to a person implicated in the allegation;
- promptly seek advice from and liaise with the Social Services Regulator or other relevant authorities, where required;
- obtain independent professional or legal advice where appropriate;
- identify and appropriately manage any actual, potential or perceived conflict of interest;
- ensure applicable reporting, investigation and governance obligations are met; and
- support the Foundation Learning Centre Board to fulfil its governance and oversight responsibilities.

If the Chair of the Foundation Learning Centre Board is implicated, unavailable or affected by an actual, potential or perceived conflict of interest, the matter must be referred to another appropriately authorised and non-conflicted Board member. Advice must be sought promptly from the Social Services Regulator regarding the appropriate reporting and management arrangements.

The Heads of Campus

Heads of Campus are responsible for supporting the day-to-day implementation of child safety requirements within their respective campuses.

Heads of Campus will:

- support immediate safety and supervision arrangements when concerns arise;
- assist with local implementation of safety, wellbeing and support plans;
- monitor supervision arrangements and child safety practices within their campus;
- promote staff compliance with the Child Safety Code of Conduct and child safety policies and procedures;
- ensure concerns are promptly documented and escalated in accordance with the Child Safety Reporting Procedure;
- support staff to understand and fulfil their child safety responsibilities;
- contribute to campus-level identification and management of child safety risks; and
- promote a safe, inclusive, culturally responsive and child-centred environment.

The involvement of a Head of Campus does not replace or delay any individual obligation to make an external report.

The Director of Operations

The Director of Operations supports the implementation of child safety requirements across Juniper College's physical, operational and digital environments.

The Director of Operations will:

- support the identification and management of child safety risks within physical and operational environments;
- oversee facility safety systems, access and egress arrangements and infrastructure relevant to child safety;
- support appropriate safety and risk-management arrangements for contractors, visitors and third-party providers;
- support compliance with applicable screening, induction and record-keeping requirements;
- contribute to the assessment and management of risks associated with online and digital environments in conjunction with relevant staff;
- support the maintenance of child safety training, screening and compliance records where these fall within operational systems; and
- contribute to the review and continuous improvement of operational child safety controls.

The Adolescent School Nurse Specialist

The Adolescent School Nurse Specialist contributes to child safety by identifying and responding to indicators of abuse, neglect, family violence, harm or other risks to a child's safety and wellbeing.

The Adolescent School Nurse Specialist will:

- provide safe, respectful and trauma-informed health support;
- document relevant observations, presentations and concerns accurately and securely;
- respond promptly to indicators or patterns that may suggest abuse, neglect or harm;
- follow the Child Safety Reporting Procedure when a child safety concern arises;
- make any external report required by their individual legal obligations;
- support safety and wellbeing planning for students with health-related needs; and
- share relevant information lawfully where necessary to protect a child.

Internal consultation or notification does not replace or delay the Adolescent School Nurse Specialist's individual mandatory reporting or other legal obligations.

The School Psychologist

The School Psychologist contributes to child safety by identifying and responding to psychological harm, abuse, trauma and other risks to a child's safety and wellbeing.

The School Psychologist will:

- provide trauma-informed and child-centred psychological support;
- identify and respond appropriately to indicators of abuse, harm or significant deterioration in wellbeing;
- maintain accurate and secure records in accordance with applicable professional, privacy and child safety requirements;
- follow the Child Safety Reporting Procedure when a child safety concern arises;
- make any external report required by their individual legal obligations;
- contribute to risk assessments, safety planning and ongoing support for affected students; and

- provide relevant guidance to staff regarding student safety, disclosures, distress and protective concerns.

Internal consultation or notification does not replace or delay the School Psychologist's individual mandatory reporting or other legal obligations.

All Staff and Other Adults Engaged by Juniper College

All employees, volunteers, contractors, external providers, Foundation Learning Centre Board members, School Council members and students on placement share responsibility for creating and maintaining a child-safe environment.

All persons covered by this policy must:

- comply with this policy, the Child Safety Code of Conduct and the Child Safety Reporting Procedure;
- prioritise the safety and wellbeing of children and young people;
- maintain appropriate professional boundaries;
- identify and respond promptly to child safety concerns;
- make all reports required by the circumstances and understand that reporting to one authority may not satisfy an obligation to report to another;
- not investigate allegations, confront an alleged perpetrator or ask leading or repeated questions;
- participate in required child safety induction, training and professional learning;
- contribute to culturally safe, inclusive and respectful environments;
- protect privacy while recognising that confidentiality must not prevent lawful reporting or information sharing necessary to protect a child;
- create accurate, factual and timely records of child safety concerns and actions; and
- continue to assess and escalate concerns when new information emerges or circumstances change.

Staff must acknowledge the Child Safety Code of Conduct on commencement, annually and whenever substantive amendments are made.

Failure to comply with child safety responsibilities may constitute misconduct and may result in disciplinary action, termination of employment or engagement, and/or notification to an external authority or regulator where required.

Managing Risks to Child Safety and Wellbeing

Juniper College proactively identifies, assesses and manages risks to child safety and wellbeing across all physical, online and off-site environments. Child safety risk management forms part of the College's broader risk-management framework and is embedded in planning, decision-making and the delivery of programs and activities.

Risks are identified and managed through appropriate policies and procedures, supervision arrangements, environmental controls, screening and induction processes, and risk assessments for activities and environments including excursions, camps, VET and Structured Workplace Learning placements, community-based learning, online and digital environments, high-risk learning activities, contractors and third-party providers.

The College considers risks arising from adult-to-student and student-to-student interactions, physical and online environments, staffing and supervision arrangements, contractors and external providers, off-site activities, access to College facilities and other circumstances that may increase the likelihood or consequence of harm to a child or young person.

The Child Safety Risk Register records identified child safety risks, existing and proposed controls, responsible persons and review requirements. The Register is reviewed regularly and whenever there is a

significant incident, identified control failure, change to College activities or environments, emerging risk, or change to relevant legislation or regulatory guidance.

All staff and other adults engaged by Juniper College are expected to identify and report child safety risks relevant to their work. Identified risks must be escalated to the appropriate responsible person and addressed in a timely manner, with the safety and wellbeing of children and young people remaining the paramount consideration.

Implementation of the Child Safe Standards

Juniper College implements the Victorian Child Safe Standards through a whole-school approach that embeds child safety, wellbeing, inclusion and the rights of children and young people across leadership, governance, policies, practices, programs and everyday interactions.

The College promotes a child-centred culture in which children and young people feel safe, are supported to understand their rights, are empowered to participate in decisions that affect them, and are confident that concerns will be heard and taken seriously.

Implementation of the Child Safe Standards is supported by clear governance and accountability, effective risk management, appropriate recruitment and screening practices, staff training and awareness, student and family engagement, accessible complaints and reporting processes, safe physical and online environments, and ongoing monitoring and review.

Juniper College maintains a continuous cycle of identifying, assessing and managing child safety risks, monitoring the effectiveness of controls, responding to concerns and incidents, and reviewing practices to identify opportunities for improvement.

The following sections describe how Juniper College implements each of the 11 Child Safe Standards in accordance with Ministerial Order No. 1359 and the College's broader child safety framework.

1. Establishing a Culturally Safe Environment

Juniper College is committed to establishing and maintaining a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal and Torres Strait Islander children and young people are respected, valued and celebrated.

The College recognises that cultural safety must be actively created and embedded across the school environment and that racism, discrimination and exclusion can cause harm and undermine the safety, wellbeing and participation of Aboriginal children and young people.

Juniper College:

- supports Aboriginal and Torres Strait Islander children and young people to express and celebrate their culture, identity and rights;
- actively supports and facilitates participation and inclusion of Aboriginal children, young people and their families within the College community;
- provides opportunities for Aboriginal students and their families to have a voice in decisions that affect them;
- maintains a zero-tolerance approach to racism and responds promptly and appropriately to incidents of racism, discrimination or cultural harm;
- embeds culturally safe, responsive and trauma-informed practices across teaching, wellbeing and student support;
- consults with Aboriginal families, communities and relevant cultural knowledge-holders where appropriate;

- supports staff to develop their understanding of Aboriginal culture, cultural safety and the impact of racism; and
- regularly reviews practices, environments and systems to identify and address barriers to cultural safety, inclusion and participation.

Cultural safety is considered across Juniper College's policies, procedures, risk-management practices, student support arrangements and physical and online environments.

2. Child Safety and Wellbeing is Embedded in Leadership, Governance and Culture

Juniper College is committed to embedding child safety and wellbeing across all levels of leadership, governance and organisational culture. Child safety is a shared responsibility and is prioritised in decision-making, planning, risk management and the everyday practices of the College.

Clear governance, accountability and oversight arrangements support the consistent implementation of the Child Safe Standards and ensure that child safety risks, concerns and opportunities for improvement are identified and addressed.

Juniper College:

- maintains clearly defined child safety roles and responsibilities for the Foundation Learning Centre Board, Principal, Deputy Principal (Child Safety Officer), nominated Head of Organisation, School Council, Heads of Campus, Director of Operations and other relevant staff;
- ensures leaders actively model and promote a culture in which the safety, wellbeing and rights of children and young people are prioritised;
- maintains effective governance arrangements for identifying, escalating and responding to child safety concerns and risks;
- maintains and regularly reviews the Child Safety Risk Register and monitors the effectiveness of identified risk controls;
- ensures child safety is regularly considered by the Leadership Team, Foundation Learning Centre Board and, where appropriate, School Council, including through appropriately de-identified reporting of risks, incidents, trends and improvement actions;
- ensures staff understand their individual child safety responsibilities and reporting obligations;
- provides appropriate resources, training and support to enable staff and other adults engaged by the College to fulfil their child safety responsibilities;
- regularly reviews child safety policies, procedures, systems and practices to ensure they remain effective and reflect current legal, regulatory and organisational requirements; and
- promotes a culture of continuous improvement in which feedback, incidents, complaints, identified risks and lessons learned are used to strengthen child safety practices;
- recognises the Foundation Learning Centre Board as the overall custodian of the child safety policy framework and the body ultimately accountable for governance oversight of its implementation.

Juniper College's governance arrangements do not alter or replace the individual reporting obligations of staff or other persons under applicable law. Internal reporting and escalation must not delay any external report required to protect a child or young person.

3. Empowering Children and Young People

Juniper College recognises that children and young people are safer when they understand their rights, are supported to participate in decisions that affect them, and feel confident to speak up when they feel unsafe or have a concern. The College promotes student voice, agency and participation and ensures that children and young people have accessible and developmentally appropriate ways to raise concerns, make complaints and seek support.

Juniper College:

- provides children and young people with age-appropriate and accessible information about their rights, including their right to feel safe, be heard and participate in decisions that affect them;
- supports students to develop the knowledge and skills needed to recognise unsafe situations, protective behaviours and risks in physical and online environments;
- provides safe, accessible and developmentally appropriate ways for students to raise concerns, make complaints or seek help;
- ensures students know who they can speak to when they have a concern and what they can expect when they raise one;
- explains to students, in an age-appropriate way, that information they share will be treated sensitively but may need to be shared with appropriate people or authorities to keep them or others safe;
- listens to and takes seriously the views, concerns and experiences of children and young people;
- involves students in decisions affecting their safety and wellbeing wherever safe, appropriate and practicable;
- provides opportunities for student voice and participation in the development and review of child safety practices, policies and school improvement activities;
- supports students to develop positive relationships with peers and trusted adults and promotes respectful, inclusive and safe interactions; and
- ensures additional support and reasonable adjustments are available so that all students can participate, communicate concerns and access help.

The College regularly considers student feedback and experiences when reviewing its child safety practices and uses this information to identify opportunities for continuous improvement.

4. Family and Community Engagement

Juniper College recognises that families and communities play an important role in promoting the safety and wellbeing of children and young people. The College is committed to working in partnership with families and the broader community and ensuring they are informed about, and have opportunities to contribute to, the College's approach to child safety.

Juniper College:

- provides families and carers with accessible and transparent information about the College's child safety policies, procedures and practices;
- ensures families and carers know how to raise a child safety concern, make a complaint or seek further information;
- communicates with families and carers about child safety and wellbeing matters in a timely, respectful and culturally appropriate manner, where it is safe and appropriate to do so;

- recognises that consultation with a parent or carer must not occur where doing so may increase risk to a child or another person, compromise an investigation, or conflict with advice from Victoria Police, DFFH Child Protection or another relevant authority;
- provides families and carers with opportunities to contribute to the development and review of child safety policies, practices and initiatives;
- seeks and considers feedback from families and the College community when reviewing child safety systems and identifying opportunities for improvement;
- supports families and carers to understand the College's child safety expectations, reporting pathways and Code of Conduct;
- communicates significant changes to child safety policies, procedures and practices to the College community; and
- works collaboratively with relevant community organisations, specialist services and other agencies to support the safety and wellbeing of children and young people where appropriate.

Feedback and participation from families and the community are considered as part of Juniper College's ongoing review and continuous improvement of its child safety practices.

5. Diversity and Equity

Juniper College recognises that children and young people have diverse identities, backgrounds, abilities, experiences and circumstances that may influence their safety, wellbeing, participation and access to support. The College is committed to creating an inclusive and equitable environment in which every student feels safe, respected, valued and able to participate fully in school life.

Juniper College:

- recognises and responds to the individual needs and circumstances of children and young people, including Aboriginal and Torres Strait Islander students, students from culturally and linguistically diverse backgrounds, students with disability, LGBTIQA+ young people, students who are unable to live at home, and students experiencing vulnerability or disadvantage;
- provides reasonable adjustments and additional supports to promote equitable access to education, participation, safety and child safety processes;
- ensures child safety information, reporting pathways and complaints processes are accessible and responsive to students' age, developmental stage, disability, communication needs, culture and circumstances;
- implements culturally safe, trauma-informed, inclusive and disability-responsive practices;
- identifies and addresses barriers that may prevent children and young people from participating, raising concerns, making complaints or accessing support;
- considers individual needs, identities and circumstances when assessing and responding to child safety risks and concerns;
- supports students to express their identity and participate in school life without discrimination, harassment, exclusion or victimisation;
- ensures staff understand how factors including disability, culture, language, gender identity, sexuality, family circumstances and experiences of trauma may affect a child or young person's safety, vulnerability and ability to seek help; and
- regularly reviews policies, practices and environments to identify and address barriers to inclusion, equity, participation and safety.

The College recognises that equitable child safety practice does not always mean treating every student in the same way. Additional supports, adjustments or safeguards may be required to ensure that all children and young people can understand their rights, participate in decisions affecting them and access help when needed.

6. Suitable Staff and Volunteers

Juniper College recognises that robust recruitment, screening, induction, supervision and performance management practices are essential to creating and maintaining a child-safe environment. The College takes all reasonable steps to ensure that adults engaged to work with children and young people are suitable, understand their child safety responsibilities and demonstrate behaviours consistent with the College's child safety expectations.

Juniper College:

- applies child safety considerations throughout recruitment, selection and appointment processes for staff and volunteers;
- clearly communicates child safety responsibilities and expectations in relevant position descriptions, recruitment materials and engagement processes;
- undertakes appropriate pre-employment and pre-engagement screening, reference checks and suitability assessments;
- verifies and maintains records of current Working with Children Checks and Victorian Institute of Teaching registrations where required;
- considers a person's suitability to work with children as part of recruitment, appointment and ongoing employment or engagement;
- requires employees, volunteers, contractors, external providers and other adults engaged by the College to comply with the Child Safety Code of Conduct and relevant child safety policies and procedures;
- provides appropriate child safety induction before or as part of commencement and ensures adults understand how to identify, respond to and report child safety concerns;
- provides ongoing child safety training, guidance and supervision appropriate to each person's role and level of contact with students;
- ensures volunteers, contractors, students on placement and third-party providers are appropriately supervised and managed according to the nature and level of their interaction with children and young people;
- monitors conduct and performance and responds promptly to concerns about an adult's behaviour, professional boundaries or suitability to work with children;
- ensures child safety concerns arising during employment or engagement are managed in accordance with the Child Safety Reporting Procedure and other applicable employment, regulatory and legal requirements; and
- maintains appropriate records of screening, induction, training, acknowledgements and other child safety compliance requirements.

Recruitment, screening or Working with Children Check requirements do not replace the College's ongoing responsibility to monitor the conduct and suitability of adults engaged to work with children and young people.

7. Complaints Processes

Juniper College recognises that children and young people, families and members of the College community must feel safe and confident to raise concerns or make complaints and trust that these will be taken seriously and responded to appropriately. Complaints processes are child-focused, accessible, culturally safe and responsive to the individual needs and circumstances of children and young people.

Juniper College:

- maintains clear, accessible and child-friendly pathways for raising concerns and making complaints;
- ensures children and young people know how and with whom they can raise a concern or complaint and are supported to do so;
- provides reasonable adjustments and additional support to enable students with disability, communication needs or other barriers to access complaints processes;
- listens to and takes seriously the views and experiences of children and young people throughout the complaints process;
- responds to complaints promptly, fairly, sensitively and in a manner that prioritises the safety and wellbeing of children and young people;
- ensures any complaint, allegation or concern that raises a child safety issue is acted upon immediately and managed in accordance with the Child Safety Reporting Procedure;
- assesses child safety concerns for any separate obligation to report to Victoria Police, DFFH Child Protection, the Social Services Regulator, the Victorian Institute of Teaching, the Victorian Registration and Qualifications Authority or another relevant authority;
- ensures internal complaints processes do not delay or replace any external reporting obligation;
- supports children, young people and families throughout the complaints and reporting process, where safe and appropriate;
- protects privacy and confidentiality while recognising that information may need to be shared lawfully to protect a child or meet reporting obligations;
- protects children and young people from victimisation or adverse consequences for raising a concern or participating in a complaints process;
- maintains appropriate records of child safety complaints, decisions, actions and outcomes; and
- reviews complaints, incidents and emerging trends to identify systemic risks and opportunities to strengthen child safety practices.

Where a complaint involves alleged child abuse or harm, the College's priority is the immediate and ongoing safety of the child or young person. Complaints management does not replace child safety reporting: all applicable internal and external reporting obligations must be considered and actioned in accordance with the Child Safety Reporting Procedure.

8. Child Safety Knowledge, Skills and Awareness

Juniper College recognises that children and young people are safer when staff and other adults engaged by the College have the knowledge, skills and confidence to identify child safety risks and concerns, respond appropriately to disclosures, and understand and fulfil their reporting and safeguarding responsibilities.

Juniper College:

- provides all staff with child safety induction and ongoing training appropriate to their roles and responsibilities;
- requires annual child safety refresher training and additional training whenever substantive changes are made to relevant legislation, regulatory requirements, policies or procedures;
- ensures staff understand the indicators and potential signs of child abuse, harm, grooming, neglect and family violence;
- ensures staff understand the Victorian Government PROTECT framework and Four Critical Actions, including how required actions may differ according to the suspected source of abuse;
- ensures staff understand how to respond appropriately to a disclosure or child safety concern, including listening to the child, avoiding leading or repeated questions and preserving potential evidence;
- provides mandatory reporting training and guidance to staff who have individual mandatory reporting obligations;
- ensures staff understand that different reporting obligations may apply simultaneously and that reporting to one authority does not necessarily satisfy an obligation to report to another;
- ensures relevant staff understand the Reportable Conduct Scheme and the role of the nominated Head of Organisation;
- provides guidance on reporting suspected criminal conduct and other external reporting obligations;
- ensures staff understand their responsibilities regarding privacy, record keeping, information sharing and communication with parents and carers;
- provides role-specific child safety training and guidance to staff with particular safeguarding, leadership, wellbeing, health, operational or governance responsibilities;
- ensures volunteers, contractors, external providers and students on placement receive child safety information, induction and training appropriate to their role and level of interaction with students;
- maintains accurate records of child safety induction, training, professional learning and required acknowledgements; and
- regularly reviews training content to ensure it remains current and responsive to changes in legislation, regulatory guidance, the PROTECT framework, identified risks and lessons arising from incidents or reviews.

Child safety knowledge and awareness are ongoing responsibilities. All staff and other adults engaged by Juniper College are expected to remain familiar with the Child Safety Reporting Procedure, Child Safety Code of Conduct and the responsibilities relevant to their role.

9. Child Safety in Physical and Online Environments

Juniper College recognises that child safety risks may arise across physical, online and off-site environments. The College proactively identifies, assesses and manages these risks while supporting children and young people to participate safely in learning, activities and the broader College community.

Juniper College:

- identifies and assesses child safety risks associated with physical, online and off-site environments and implements appropriate controls to prevent or reduce the risk of harm;
- conducts regular supervision reviews and environmental assessments to identify areas or circumstances that may increase opportunities for abuse, harm, inappropriate conduct or unsafe interactions;

- ensures supervision arrangements are appropriate to the age, needs, vulnerabilities and activities of students;
- considers child safety when designing, modifying or using physical spaces, including visibility, access, privacy, supervision and interactions between adults and students;
- manages access to College premises and implements appropriate arrangements for visitors, contractors, volunteers and third-party providers;
- ensures online platforms, digital technologies and communication channels used in connection with the College are appropriately managed and monitored to reduce child safety risks;
- establishes clear expectations for appropriate online communication and interactions between staff, other adults engaged by the College and students;
- identifies and manages risks associated with excursions, camps, College-arranged transport, VET and Structured Workplace Learning placements, community-based learning and other off-site activities;
- undertakes appropriate risk assessments for higher-risk learning environments and activities;
- considers child safety risks when engaging contractors, external providers and other organisations that provide services or activities involving students;
- ensures risk controls balance the need to protect children and young people from harm with their rights to privacy, participation, learning and appropriate independence;
- responds promptly to identified environmental risks, incidents, near misses or control failures; and
- reviews risk controls regularly and when circumstances, environments, activities or identified risks change.

Child safety risks associated with physical and online environments are incorporated into Juniper College's broader risk-management processes and, where appropriate, the Child Safety Risk Register. Staff and other adults engaged by the College are expected to identify and report environmental child safety risks relevant to their work and to comply with established supervision, access, online safety and risk-management requirements.

10. Review of Child Safety Practices

Juniper College is committed to the continuous review and improvement of its child safety practices. The College regularly evaluates the effectiveness of its policies, procedures, systems, risk controls and practices to ensure they remain responsive to the needs of children and young people and reflect current legal, regulatory and organisational requirements.

Juniper College:

- reviews child safety policies and procedures at least annually and earlier where required following a significant incident, identified risk, legislative or regulatory change, or change to relevant guidance;
- reviews the Child Safety Risk Register regularly and updates risks and controls in response to incidents, emerging risks, environmental or organisational changes and identified control failures;
- analyses child safety concerns, disclosures, allegations, complaints, incidents and near misses to identify trends, systemic issues and opportunities for improvement;
- reviews the effectiveness of actions and controls implemented in response to child safety incidents and identified risks;
- considers changes to relevant legislation, Ministerial Order No. 1359, the Child Safe Standards, the Reportable Conduct Scheme and the Victorian Government PROTECT framework when reviewing child safety practices;

- seeks and considers feedback from children and young people, families, staff and other members of the College community as part of the review process;
- ensures reviews consider the experiences and needs of students who may experience additional barriers to safety, participation or raising concerns;
- uses findings from complaints, investigations, audits, risk assessments, regulatory guidance and other reviews to inform improvements;
- documents identified improvements, assigns responsibility for actions and monitors their implementation;
- provides appropriate reporting to the Leadership Team, Foundation Learning Centre Board and, where appropriate, School Council regarding significant child safety risks, review findings, trends and improvement actions;
- communicates relevant changes to child safety policies, procedures and practices to staff, students and families as appropriate.

Where a review identifies a gap, weakness or emerging risk, Juniper College will take timely action to strengthen its child safety arrangements and monitor the effectiveness of the changes made.

11. Implementation of Child Safety Policies and Procedures

Juniper College maintains clear, accessible and comprehensive child safety policies and procedures that document how the College creates and maintains a child-safe environment. These documents establish expectations, responsibilities and processes for preventing, identifying and responding to child safety risks and concerns and are embedded in the College's everyday practices.

Juniper College:

- maintains a comprehensive suite of child safety policies, procedures and supporting documents that reflect the Child Safe Standards, Ministerial Order No. 1359 and other applicable legal and regulatory requirements;
- ensures the Child Safety and Wellbeing Policy, Child Safety Reporting Procedure and Child Safety Code of Conduct operate as an integrated child safety framework and are consistent in their terminology, roles, responsibilities and reporting pathways;
- makes child safety policies and procedures readily accessible to staff, students, families, volunteers, contractors and other members of the College community, as appropriate;
- ensures child safety policies and procedures are implemented consistently across all campuses, programs, activities and environments;
- incorporates relevant child safety requirements into staff induction, training, professional learning and regular communications;
- ensures volunteers, contractors, external providers and students on placement are informed of and understand the child safety requirements relevant to their engagement;
- supports children and young people to understand the child safety policies, expectations and reporting pathways relevant to them in accessible and developmentally appropriate ways;
- communicates relevant child safety information and significant policy changes to families and the broader College community;
- monitors compliance with child safety policies, procedures and the Child Safety Code of Conduct and responds appropriately where requirements are not followed;
- regularly reviews child safety policies and procedures to ensure they remain current, effective and consistent with legislation, regulatory requirements and relevant Victorian Government guidance;

- reviews policies and procedures following significant incidents, identified control failures, complaints, audit findings, changes to legislation or regulatory guidance, or other circumstances indicating that improvement may be required; and
- maintains appropriate records of Foundation Learning Centre Board approval, School Council consideration, review, communication, training and staff acknowledgements.

The Foundation Learning Centre Board maintains governance oversight of the child safety policy suite as its overall custodian. The Principal is responsible for ensuring that the Board-approved policies and procedures are implemented consistently throughout Juniper College.

Responsibility for implementing child safety policies and procedures is shared across Juniper College. Leaders are responsible for supporting and monitoring implementation within their areas of responsibility, while all staff and other adults engaged by the College are expected to understand and comply with the requirements relevant to their role.

Child safety policies and procedures are reviewed as part of Juniper College's continuous improvement processes to ensure that documented requirements are reflected in practice and remain effective in protecting children and young people.

Privacy and Information Sharing

Juniper College is committed to protecting the privacy of children, young people and families while recognising that the safety and wellbeing of children may require information to be shared with appropriate people, services and authorities. Personal, sensitive and health information is managed in accordance with applicable privacy, information-sharing and child safety legislation, including the Privacy and Data Protection Act 2014 (Vic), the Health Records Act 2001 (Vic), the Child Wellbeing and Safety Act 2005 (Vic), Ministerial Order No. 1359 and the College's Privacy Policy.

Privacy and confidentiality obligations must not prevent or delay action required to protect a child or young person, make a required report, or lawfully share information relevant to their safety or wellbeing.

Information relating to child safety concerns, disclosures, allegations, incidents, reports and safety assessments is collected, used, disclosed and stored only as necessary and appropriate. Access is restricted to authorised persons whose responsibilities require access to the information.

When responding to child safety concerns, Juniper College may lawfully disclose or share relevant information with authorities and agencies including Victoria Police, DFFH Child Protection, the Social Services Regulator, the Victorian Registration and Qualifications Authority (VRQA), the Victorian Institute of Teaching (VIT) and other authorised services or agencies where required or permitted by law.

Juniper College participates in the Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS) and may request or share information with prescribed Information Sharing Entities where the applicable legislative requirements are met. Information may be shared without the consent of a parent, carer or child where permitted by law. Information sharing must be relevant and appropriately limited to what is necessary for the applicable purpose.

Staff must:

- treat child safety information sensitively and only disclose it to persons who have a legitimate need or lawful authority to receive it;
- not promise a child or young person absolute confidentiality or secrecy when receiving a disclosure or concern;
- explain, in an age-appropriate and sensitive manner, that information may need to be shared with people who can help keep them or another person safe;

- make all required reports and share information lawfully where necessary to protect a child or young person;
- comply with the Child Safety Reporting Procedure when recording, reporting or sharing information relating to a child safety concern;
- ensure information recorded or shared is accurate, factual, relevant and appropriately limited;
- seek guidance from the Child Safety Officer or Principal where uncertain about information-sharing requirements, provided doing so does not delay an urgent or mandatory report; and
- maintain appropriate records of significant information-sharing decisions and disclosures.

Where a parent, carer or family member is alleged or suspected to have caused harm, or where informing them may increase risk to a child or another person, compromise an investigation or conflict with advice from an authority, staff must not disclose information or contact the parent or carer without appropriate guidance.

Juniper College will communicate with children, young people and families about how their information is collected, used, stored and shared in an accessible and transparent manner. At all times, privacy and confidentiality will be balanced with, and must not impede, the College's legal and safeguarding responsibilities to protect children and young people.

Records Management

Juniper College maintains accurate, secure and confidential records relating to child safety and wellbeing. Effective record keeping supports the safety of children and young people, continuity of support, informed decision-making, organisational accountability and compliance with legal and regulatory obligations.

Child safety records are created, maintained, accessed, retained and disposed of in accordance with applicable legislation, regulatory requirements and Juniper College's records management and privacy requirements.

All staff and other adults engaged by Juniper College must create clear, contemporaneous and factual records when responding to child safety concerns. Records should document, as relevant:

- observations and indicators of harm;
- disclosures, allegations, incidents or concerns;
- the child or young person's own words where appropriate;
- immediate safety actions taken;
- advice sought and received;
- internal notifications and escalation;
- reports made to Victoria Police, DFFH Child Protection, the Social Services Regulator or other relevant authorities;
- information-sharing decisions and disclosures;
- referrals and communication with external services;
- communication with parents or carers, where appropriate;
- safety, wellbeing and support plans; and
- decisions made, the reasons for those decisions and any follow-up actions required.

Records must be completed as soon as practicable, dated and attributable to the person making the record. Records must distinguish factual observations and information received from professional judgement or opinion. Staff must not alter, delete, destroy or retrospectively modify child safety records in a way that compromises the integrity of the original record. Any correction or additional information must be appropriately documented and attributable.

Child safety records must be stored securely with access restricted to authorised persons who require the information to fulfil their responsibilities. Access may include the Principal, Deputy Principal (Child Safety

Officer), nominated Head of Organisation, relevant Heads of Campus and other persons authorised according to the nature of the matter and their responsibilities.

Child safety information must not automatically be placed on general student or personnel files where doing so would provide inappropriate access to sensitive or restricted information. Records must be maintained in the appropriate secure system, with relevant information made available to staff where necessary to support the ongoing safety and wellbeing of the child or young person.

Records relating to matters under the Reportable Conduct Scheme must be maintained securely and retained in accordance with applicable legislation, regulatory requirements and requirements of the Social Services Regulator. Records relating to reports to Victoria Police, DFFH Child Protection or other authorities must also be retained in accordance with applicable legal and College requirements.

Juniper College will retain child safety records for the applicable retention period and ensure records can be located and produced when lawfully required by an authority, regulator, court or other authorised body.

The College regularly reviews its child safety record-keeping practices, including access controls, storage arrangements and record quality, to ensure they remain secure, accurate and consistent with current legal and regulatory requirements.

Confidentiality and privacy must not prevent the creation, retention or lawful sharing of records necessary to protect a child or young person or meet a reporting obligation.

Communications

Juniper College is committed to ensuring that its child safety expectations, policies, procedures and reporting pathways are clearly communicated and accessible to children and young people, staff, families, volunteers, contractors and the broader College community.

Key child safety documents, including the Child Safety and Wellbeing Policy, Child Safety Code of Conduct and Child Safety Reporting Procedure, are made available through appropriate College communication channels, including the Juniper College website, intranet and other relevant platforms.

Juniper College:

- communicates child safety responsibilities, expectations and reporting pathways to staff as part of induction, ongoing training and regular staff communications;
- provides children and young people with accessible, age-appropriate and developmentally appropriate information about their rights, expected standards of behaviour, how to raise a concern or make a complaint, and where they can seek help;
- provides families and carers with accessible information about the College's approach to child safety, relevant policies and procedures, and pathways for raising concerns or complaints;
- makes relevant Victorian Government PROTECT information and resources available to staff and incorporates current PROTECT guidance into child safety training and communications;
- communicates significant changes to child safety policies, procedures, responsibilities or reporting requirements to relevant members of the College community;
- uses staff meetings, professional learning, newsletters, leadership and School Council meetings, student communications and other appropriate channels to reinforce child safety expectations and promote awareness;
- ensures child safety information is provided in accessible formats and considers the communication, language, cultural and disability-related needs of students and families; and

- regularly reviews child safety communications to ensure information remains current, accessible and consistent with the College's policies, procedures and legal and regulatory obligations.

Child safety communication is an ongoing responsibility. Juniper College seeks to ensure that children and young people, staff and families understand how child safety is supported, what is expected of them, how concerns can be raised, and what will occur when a child safety concern is reported.

Related Policies and Procedures

This Child Safety and Wellbeing Policy is to be read in conjunction with other related school policies, procedures, and codes. These include our:

- Juniper College Child Safety Reporting Procedure
- Child Safety Code of Conduct
- Complaints and Appeals Policy
- Access, Equity, Integration and Cultural Diversity policy
- Online Safety and Digital Technology policy
- Harassment, Bullying (including cyber bullying) and Victimisation policy
- Juniper College Disability, Inclusion and Reasonable Adjustments policy

Other Related Documents

- Victorian Government PROTECT – 4 Critical Actions to Identify and Respond to Child Abuse
    - PROTECT – Adult engaged by an independent school: 4 Critical Actions reference sheet
    - PROTECT – Adult engaged by an independent school: recording template
    - PROTECT – Student-to-student abuse: 4 Critical Actions reference sheet
    - PROTECT – Student-to-student: recording template
    - PROTECT – In the family: 4 Critical Actions reference sheet
    - PROTECT – In the family: recording template
    - PROTECT – In the community: 4 Critical Actions reference sheet
    - PROTECT – In the community: recording template
    - PROTECT – Supporting guidance for schools
- Child Information Sharing Scheme (CISS)
- Family Violence Information Sharing Scheme (FVISS)
- Multi-Agency Risk Assessment and Management (MARAM) Framework
- Child Link
- Social Services Regulator – Reportable Conduct Scheme guidance
- Victorian Registration and Qualifications Authority – Child Safe Standards guidance for schools

Policy Status and Review

The Foundation Learning Centre Board is the overall custodian and approval authority for the Juniper College child safety policy framework. The Principal is responsible for coordinating the review of this Policy at least annually, and earlier following a significant child safety incident, legislative or regulatory change, identified control failure or emerging risk. The Principal will submit proposed substantive amendments to the Foundation Learning Centre Board for approval. The Juniper College School Council may review and recommend amendments within its delegated governance role, but final approval rests with the Foundation Learning Centre Board.

Policy History

Version	Date approved	Changes made	Approved by	Next review date
1.1	20th November 2023	Bron O'Callaghan	FLC Board	March 2025
1.2	May 2025	Julie Young/Micah Jones	Juniper College School Council	May 2026
1.3	December 2025	Micah Jones	Juniper College School Council	December 2025
1.4	August 2026	Micah Jones	Juniper College School Council	August 2026