



GEELONG GRAMMAR SCHOOL

Student Safeguarding Policy

1. Purpose

- 1.1 This Policy sets out Geelong Grammar School (the **School**)'s approach to creating and maintaining a student safe organisation, where Students are safe and feel safe.
- 1.2 This Policy also provides the framework for the School's approach to embedding the Victorian Child Safe Standards and National Child Safe Principles.

2. Scope

- 2.1 This Policy applies to all School Employees, Third Party Contractors, Volunteers and members of the School Community in the School Environment, whether or not they work directly with students. This Policy also extends to all campus residents and persons visiting campus residents.

3. Student Safeguarding Principles

- 3.1 The School commits to:
 - 3.1.1 a culturally safe environment where the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued and all School Employees, Third Party Contractors and Volunteers remain culturally sensitive and racially aware within their roles;
 - 3.1.2 Student Safeguarding forming an explicit and embedded aspect of all leadership and governance and champions safety and equity for all students;
 - 3.1.3 Students being empowered about their rights, participating in decisions affecting them and being taken seriously;
 - 3.1.4 the School Community being informed and involved in promoting student safeguarding;
 - 3.1.5 equity being upheld for all Students and diverse needs being recognised and respected in policy and practice;
 - 3.1.6 all School Employees, Third Party Contractors and Volunteers being appropriately screened, and supported to reflect student safeguarding values in their practice;
 - 3.1.7 enabling processes for complaints and concerns to be student focused;
 - 3.1.8 all School Employees, Third Party Contractors and Volunteers being equipped with the knowledge, skills and awareness to keep Students safe through ongoing education and training;
 - 3.1.9 physical and online environments promoting student safeguarding while minimising the opportunity for Students to be harmed;
 - 3.1.10 the regular review and improvement of the implementation of the Child Safe Standards;
 - 3.1.11 policies and procedures documenting how the School achieves student safeguarding for all Students;
 - 3.1.12 School Employees, Third Party Contractors, Volunteers and members of the School Community engaged in child connected work being made aware of their responsibilities to children and Students, information sharing and reporting obligations, and record keeping obligations; and.
 - 3.1.13 the PROTECT Framework being applied requiring School Employees, Third Party Contractors and Volunteers to act immediately on concerns, follow the Four Critical Actions, and meet all reporting obligations.

4. Four Critical Actions

- 4.1 The Four Critical Actions for responding to student safeguarding concerns are:

- Identify

- Abuse may be identified by witnessing behaviour or an incident, receiving a disclosure or observing physical or behavioural signs.

- Report

- As soon as a reasonable belief is formed, inform School Leadership and report to Child Protection or Victoria Police.

- Support

- Arrange support for impacted students. Engage students and inform parents/guardians (if safe to do so). Tailor support to diverse needs; use information sharing and continue supports as long as necessary.

- Refer

- Support the student's wellbeing through appropriate care, safety planning, referrals, and continued monitoring.

5. Roles and Responsibilities

- 5.1 The School will enable all School Employees, Third Party Contractors and Volunteers to understand their role, responsibilities and conducted expected in protecting students from abuse and neglect. School Employees, Third Party Contractors and Volunteers must comply with the School's Student Safeguarding Code of Conduct, which clearly distinguishes between appropriate and inappropriate behaviour. Behaviour by any School Employee, Third Party Contractor, Volunteer or student that may compromise or threaten the safety of any other student, is further defined within the GGS Equal Opportunity and Respectful Workplace Behaviour Policy and Procedure, Third Party Contractor engagement processes, volunteer engagement processes and Student Behaviour Rules.



- 5.2 All School Employees must act with cultural awareness and racial sensitivity.
- 5.3 A **Student Safeguarding and Risk Officer** is appointed by the School to enable:
 - 5.3.1 Victorian Child Safe Standards and the National Child Safe Principles to inform all related School student safeguarding Policies and the Student Safeguarding Code of Conduct;
 - 5.3.2 an annual programme for monitoring the School's compliance with the Student Safeguarding Policy to be implemented. School Employees, Third Party Contractors, Volunteers, Students and members of the School Community can approach the Student Safeguarding and Risk Officer if they have any concerns regarding the School's compliance with the Student Safeguarding Policy;
 - 5.3.3 guidance and support with investigating and reporting on any student safeguarding matters or incidents in conjunction with relevant School Employees; and
 - 5.3.4 School Employees, Third Party Contractors, Volunteers, Students and the School Community to be informed about this Student Safeguarding Policy and that it is publicly available.
- 5.4 All **School Employees** are required to:
 - 5.4.1 support an environment where opportunities for Student Friendships are valued and recognise the importance of fostering Student Friendships in support of students raising safety concerns;
 - 5.4.2 champion a culturally safe environment where the diverse and unique identities and experiences of all students are respected and valued;
 - 5.4.3 remain culturally sensitive and racially aware within their role in supporting student learning and protecting students' rights;
 - 5.4.4 act in accordance with this Policy and the School's Student Safeguarding Code of Conduct, which clearly distinguishes between appropriate and inappropriate behaviour, and maintain familiarity with that document as part of daily work;
 - 5.4.5 act in accordance with the Student Safety Responding and Reporting Policies and associated procedures at all times, including following the Four Critical Actions for Schools where necessary;
 - 5.4.6 act and report on complaints and concerns relating to child abuse in accordance with the School's Student Safeguarding Responding and Reporting Policies including generally to:
 - 5.4.6.1 ensure the complaint or concern is taken seriously; and
 - 5.4.6.2 responding appropriately to a child or student who raises or is affected by the complaint or concern.
 - 5.4.7 undertake annual training on Student Safeguarding including completion of the Protecting Children –as required by the School to support ongoing awareness and understanding of student safeguarding matters;
 - 5.4.8 act in accordance with their legal obligations, including:
 - 5.4.8.1 Failure to Disclose Offence (the obligation under this offence applies to all adults);
 - 5.4.8.2 Duty of Care Principle (this obligation applies to all School Employees);
 - 5.4.8.3 Mandatory Reporting obligations (this obligation applies to all mandatory reporters);
 - 5.4.8.4 Failure to Protect Offence (this obligation applies to a Person or School Employee in a Position of Authority within the School);
 - 5.4.8.5 Reportable Conduct obligations (this obligation applies to all School Employees in reporting conduct to the Principal, and applies to the Principal in reporting to the Social Services Regulator (SSR); and
 - 5.4.8.6 the organisational duty of care (this obligation applies to the School as an organisation).
- 5.5 In line with the School's student safeguarding culture, **School Leadership** will:
 - 5.5.1 actively champion and enable student safeguarding strategies and initiatives across the School;
 - 5.5.2 consider the diversity of all students, including (but not limited to) the needs of Aboriginal and Torres Strait Islander students, students from culturally and linguistically diverse backgrounds, students with disabilities, overseas students and students who self-identify as LGBTIQIA+, and all other students who enter the School's care who may be recognised as vulnerable;
 - 5.5.3 ensure student safeguarding is a fixed agenda item at School Leadership meetings and School Employee meetings;
 - 5.5.4 encourage and enable School Employee professional learning and training to build deeper understandings of student safeguarding and prevention of abuse;
 - 5.5.5 ensure that no one is prohibited or discouraged from reporting an allegation of student abuse to a person external to the School or from making records of any allegation; and
 - 5.5.6 act and report on complaints and concerns relating to child abuse in accordance with the School's Student Safeguarding Responding and Reporting Policies including generally to:
 - 5.5.6.1 ensure that the complaint or concern is taken seriously by those who are notified, including the Victorian Police;
 - 5.5.6.2 promptly and thoroughly managing the response of the School's services in line with the School's Critical Incident Response Procedure;
 - 5.5.6.3 responding appropriately to a Student who raises or is affected by the complaint or concern;
 - 5.5.6.4 monitoring overall compliance of the School's services with the relevant Student Safeguarding Responding and Reporting Policies; and
 - 5.5.6.5 managing an alternative procedure for responding to the complaint or concern if any person allocated responsibility under the relevant Policy cannot perform their role for any reason.
 - 5.5.7 regularly review reports (quarterly) on student safeguarding and evaluate needs to update student safeguarding policies, as a measure to improve practices and reduce potential risks.



5.6 In line with the School's student safeguarding culture, **campus residents and persons visiting campus residents at the Corio and Timbertop campuses** have responsibilities as follows:

- 5.6.1 Campus residents who permanently reside in campus properties, who are aged 18 years or over, hold a valid Working with Children Clearance (WWCC) or VIT registration. The obligation applies to, without limitation, partners and adult children of School Employees;
- 5.6.2 any adult family members (and/or friends) of School Employees who reside in a campus property for more than three (3) consecutive days or more than seven (7) days within a four (4) week period during Term time must hold a Valid WWCC; and
- 5.6.3 overseas or interstate visitors who perform student related work during School Term time and are not a VIT registered teacher or do not hold a valid WWCC are required to comply with the Procedure for Overseas and Interstate Visitors before their visit. The School Employee hosting the visitor is responsible to ensure compliance with this Procedure.

6. Students aged 18 years and over

6.1 In line with the School's student safeguarding culture and relevant legal obligations, students aged 18 years and older must report any concerns regarding the safety of Students to a School Employee they trust. This could include (but is not limited to), a Head of House or Unit, Tutor, Teacher, the Student Safeguarding and Risk Officer, Head of Campus, Vice Principal or Principal.

7. Recruitment and Engagement

- 7.1 When recruiting School Employees, or engaging Third Party Contractors and Volunteers, the School ensures that student safe recruitment or engagement practices are followed in all circumstances and such practices meet the Victorian Child Safe Standards and Ministerial Order 1359.
- 7.2 All Employees of the School must be recruited following the steps as defined in the Geelong Grammar School Recruitment and Selection Policy. The School must ensure line managers complete the Interview Assessment Template and Pre-Employment checks for student safeguarding.
- 7.3 All Contractors will follow pre-contracting checks for student safeguarding through the School's Safeguarding systems (including, but not limited to LinkSafe & Oho).
- 7.4 All Volunteers will follow the steps for engagement as required by the School's volunteer engagement processes.

8. Training and Supervision

- 8.1 Training and education are important to enable everyone in the School to understand that student safeguarding is everyone's responsibility.
- 8.2 All School Employees, Third Party Contractors, Volunteers, members of the School Community and students should feel confident and comfortable in coming forward with any allegations or suspicions of student abuse or student safeguarding concerns. School Employees, are trained to identify, assess, and minimise risks of student abuse and to detect potential signs of student abuse. This training occurs annually or more often as required.
- 8.3 The School also supports School Employees, Third Party Contractors and Volunteers through ongoing supervision to develop their skills to protect Students from abuse, and promote safety for all Students, particularly Aboriginal and Torres Strait Islander Students, Students from culturally and linguistically diverse backgrounds, Students with disabilities, Overseas Students and Students who self-identify as LGBTIQIA+, and all other Students who enter the School's care who may be recognised as vulnerable.
- 8.4 New School Employees, Third Party Contractors and Volunteers will be inducted into the School, including by being referred to this Policy, signing the Student Safeguarding Code of Conduct, and inducted to the Student Safeguarding Responding and Reporting Policies on the School website or intranet (as applicable to the role). They will also be supervised regularly to ensure they understand the School's commitment to student safeguarding, and that their behaviour towards Students is safe and appropriate.
- 8.5 All School Employees, Third Party Contractors and Volunteers will be managed and monitored to ensure their continuing suitability for student-connected work. Any inappropriate behaviour must be reported to the School Leadership or Student Safeguarding and Risk Officer and will be managed in accordance with the School's Student Safeguarding Responding and Reporting Policies as required.
- 8.6 Education and training opportunities for online safety practices will form part the School's Cybersafety Policies, informed by ICT User Cybersafety Guides for School Employees and Students.

9. Allegations, Concerns and Complaints

- 9.1 The School has an accessible, student focused complaint handling policy to support Students and families in reporting matters of concern. In addition, the Student Safeguarding Responding and Reporting Policies for reporting clearly outline the roles and responsibilities of leadership, School Employees, Third Party Contractors and volunteers and the approaches to dealing with different types of complaints and the obligations to act and report. All Complaints are taken seriously and will be responded to promptly and thoroughly.
- 9.2 The School has clear expectations for all School Employees, Third Party Contractors and Volunteers in making a report about a Student who may be in need of protection. All School Employees, Third Party Contractors and Volunteers must follow the



school's Student Safeguarding Responding and Reporting Policies as applicable if there is an incident, disclosure or suspicion of student abuse.

- 9.3 The School will never prohibit or discourage School Employees, Third Party Contractors and Volunteers from reporting an allegation of student abuse. The School will act on any complaint in accordance with the School's Student Safeguarding Responding and Reporting Policies.

10. Risk Reduction and Management

- 10.1 The School recognises there are potential risks to Students and will take a risk management approach by undertaking proactive and preventative measures. The School implements proper risk management processes as defined within the School's Risk Management Framework. Where online risks are identified the School will also be guided by its Data Breach Response Plan (as applicable).
- 10.2 The School will identify and mitigate the risks of student abuse in individual environments by taking into account the nature of such environment, including online environments, the activities expected to be conducted in that environment and the characteristics and needs of all students in that environment.
- 10.3 The School recognises the increased potential for online risks through its Cybersafety Policy.
- 10.4 The School monitors and evaluates the effectiveness of the actions it takes to reduce or remove risks to student safety. Reporting and investigating matters of student safety are achieved through the Schools Incident Reporting Tool and informed by Incident Reporting Thresholds. Regular School audits (as informed by VRQA and ABSA standards and other applicable requirements) will be carried out to review and improve student safeguarding practices and update the School Risk Register.

11. Maintaining Student Equity - Listening To, Communicating With, and Empowering Students

- 11.1 The School has developed a safe, inclusive, and supportive learning environment that involves and communicates with Students and their parents/guardians. The School encourages student and parent/guardian involvement and engagement that informs safe School operations and builds the capability of students and parents/guardians to understand their rights and their responsibilities. The School is committed to supporting and encouraging students to use their voice to raise and share their concerns with a trusted adult at any time of need.
- 11.2 When the School is gathering information in relation to a complaint about alleged misconduct with or abuse of a Student, the School will listen to the complainant's account and take them seriously, check understanding and keep the Student (and/or their parents/guardian, as appropriate) informed about progress.
- 11.3 The School promotes and champions the Victorian Child Safeguarding Standards and National Child Safe Principles in ways that are readily accessible, easy to understand, and user-friendly to Students, including:
- 11.3.1 all of the School's student safeguarding policies and procedures will be available for the Students and parents/guardians at all School campuses and/or online on its Learning Management Platform (Hive) or publicly available on the School website (as applicable);
 - 11.3.2 PROTECT visual Student Safeguarding posters are displayed across all School campuses,
 - 11.3.3 School newsletters and the learning management system (Hive) will inform students and the School community about the School's commitment to student safeguarding, and strategies or initiatives that the School is taking to ensure student safety; and
 - 11.3.4 Students will be provided learning opportunities and information that enable them to follow and apply the values of the Respect & Responsibility curriculum and that align with the Child Safe Standards.
- 11.4 Each School campus is encouraged to contribute to risk assessment and mitigation for student safeguarding and any new risks are addressed and explained at year level assemblies and through parent/guardian information sessions (as required).
- 11.5 The School will use its health and wellbeing programmes to deliver appropriate education to its Students about standards of behaviour for students attending the School; healthy and respectful relationships (including sexuality); resilience; and student abuse awareness and prevention.

12. Communications

- 12.1 The School is committed to communicating its student safeguarding strategies to the School community through:
- 12.1.1 ensuring that this Policy, Student Safeguarding Code of Conduct, and the Student Safeguarding Responding and Reporting Policies are available on the School website, intranet and learning management system (Hive), through internal communication channels and through the recruitment process;
 - 12.1.2 focused Campus specific group forums are provided for family access via the School's learning management system (Hive) to enable family members to communicate and engage with updates from the School;
 - 12.1.3 ensuring that student safeguarding is a fixed agenda item at School leadership meetings and staff meetings for discussion; and
 - 12.1.4 placing relevant safeguarding posters and information across campuses for public display.

13. Confidentiality and Privacy

- 13.1 The School collects, uses and discloses information about particular Students and their families in accordance with Victorian privacy law and other relevant laws.
- 13.2 The principles regulating the collection, use and storage of information is found in the School's Privacy Policy.



14. Related policies and Documents

14.1 Related policies and documents include:

- 14.1.1 Student Safeguarding Code of Conduct;
- 14.1.2 Student Safeguarding Responding and Reporting Policies;
- 14.1.3 Privacy Policy;
- 14.1.4 Identifying and Responding to All Forms of Abuse in Victorian Schools;
- 14.1.5 PROTECT Framework;
- 14.1.6 Student Behaviour Rules;
- 14.1.7 Equal Opportunity & Respectful Workplace Behaviour Policy;
- 14.1.8 Inclusivity Policy;
- 14.1.9 Risk Management Framework;
- 14.1.10 Recruitment and Selection Policy;
- 14.1.11 Volunteer Engagement Handbook;
- 14.1.12 Cybersafety Policy (Staff & Students);
- 14.1.13 Cybersafety Guidelines (Staff & Students); and
- 14.1.14 Data Breach Response Plan.

15. Policy Evaluation and Review

- 15.1 To ensure ongoing relevance and continuous improvement, this Policy will be reviewed annually and endorsed by the School Council.

16. Definitions

Student abuse	includes any act committed against a student involving: 1. a sexual offence; 2. grooming; 3. the infliction, on a student, of: a. physical violence; b. serious emotional or psychological harm; and c. serious neglect of a student.
Student-connected work	Student-connected work means work authorised by the School or School Council, and performed by an adult in a School Environment while students are present or reasonably expected to be present.
Student Safeguarding Responding and Reporting Policies	means: 1. Mandatory Reporting Policy; 2. Obligation to Protect Policy; 3. Obligation to Disclose Policy; and 4. Reportable Conduct Policy.
PROTECT Framework	means a framework of actions to identify and respond to child abuse by an adult (more information is available at https://www.vic.gov.au/protect-schools)
SSR	Social Services Regulator (SSR)
Student Safeguarding	Student safeguarding encompasses matters related to protecting all students from abuse, actively managing the risk of student abuse, providing support to a student at risk of abuse, and responding to and reporting on incidents or allegations of abuse. Student Safeguarding is also a proactive and mindful action to promote student safeguarding practices that ensure the rights of all students to a safe and culturally sensitive learning environment, where the equity of each student is upheld and students are not discriminated against in terms of culture, race, disability or self-identity.
Student Friendships	Supporting 'Friendships' is identified where students feel able to develop trusting and prosocial behaviours, that are equitable and involve mutual agreement. Students feel able to seek support from peers to solve problems and derive a sense of personal connection from the process of sharing emotions and behaviours with friends. Friendships enhance a student's sense of wellbeing with reciprocity to their peers.
the School	means Geelong Grammar School including its registered boarding premises.
the School Community	means parents, guardians, homestay providers and carers of Students
School Environment	School environment means any physical or virtual place made available or authorised by the School for use by a student during or outside school hours, including: 1. a campus of the School; 2. online School environments (including email and intranet systems); and 3. other locations provided by the School for a student's use (including, without limitation, locations used for School camps, sporting events, excursions, competitions, homestays, and other School activities or events)



School Employees	means all members of the Executive and Leadership teams and all other campus and boarding premises employees, whether employed on a full, part time or casual basis and for the purposes of this Policy includes all members of School Council.
School Leadership	means the Principal, Vice Principals, Executive Team, the Executive's Leadership Team and campus based Leadership Teams
Student	means a student including a person aged over 18 years enrolled at the School
Third Party Contractor	means a third party service provider engaged by the School to provide a service to the School and or its students.
Volunteer	means people who assist the School in some capacity directly or indirectly School activities, and will have access to students (including virtual/online) or student places of study (i.e. campus, School camp or sporting event, hosting accommodation) including but not limited to: 1. a volunteer or a contracted service provider engaged in School activities (whether or not a body corporate or any other person is an intermediary); and 2. homestay providers.

17. Review and circulation

Version:	4
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