



BUNBURY
BAPTIST COLLEGE

**STAFF CODE OF CONDUCT INCLUDING GUIDELINES OF HOW TO COMPLY
BUNBURY BAPTIST COLLEGE**

Purpose

The College has a responsibility for the welfare of its staff and students. As a result it aims to provide a working environment in which the agency of students is maximised and staff/student relationships are developed in order to improve teaching and learning. The College aspires to maintain a friendly and professional atmosphere. This atmosphere contributes to an effective and enjoyable learning environment.

The College recognises that in a healthy working environment, positive staff and student relationships will be formed; however, in order to protect both staff and students, the boundaries of personal and professional life must be fully recognised and respected.

With the New Standards for Child Protection in Non-Government Colleges applicable as of 1 January 2017, it is essential that the Staff Code of Conduct complies with these standards. It is particularly important that all College staff, College Board members, volunteers and parents understand the difference between grooming and sexual abuse and the delineation of the boundaries between appropriate and inappropriate interaction between students, and between students and adults. These are addressed in this policy.

Child grooming: The use of a variety of manipulative and controlling techniques with a vulnerable subject in order to establish trust or normalize sexually harmful behaviour with the overall aim of facilitating exploitation and/or prohibiting exposure.

Sexual abuse, in relation to a child, includes sexual behaviour in circumstances where:

- a) the child is the subject of bribery, coercion, a threat, exploitation or violence;
- b) the child has less power than another person involved in the behaviour; or
- c) there is a significant disparity in the developmental function or maturity of the child and another person involved in the behaviour.

General

This *Code* is not intended to be contractual in nature and does not impose any contractual obligations on the College. The College reserves the right at its sole discretion to vary or cancel this Code at any time.

Nothing in this Code should be taken to limit the circumstances in respect of which the College may take disciplinary action in respect of an employee.

Who has to comply with the Code of Conduct?

By accepting employment with the College all staff and members of the College Board must be aware of and comply with this *Code*.

How to Comply

1. You must:
 - (a) conduct yourself, both personally and professionally in a manner that upholds the ethos and reputation of the College;
 - (b) comply with the school's policies and procedures; and
 - (c) act ethically and responsibly;
 - (d) be accountable for your actions

1. What is expected of you as an employee?

As an employee, you should be aware of the College's policies and procedures, particularly those that apply to your work. Many of these are available on the College website; others may be made available to you through induction, training and development programs and Staff Handbook.

If you are uncertain about the scope or content of a policy with which you must comply, you should seek clarification from the Principal or your direct supervisor or line manager.

As a College employee, you are expected to:

- a) perform your duties to the best of your ability, in a timely manner and be accountable for your performance;
- b) follow reasonable instructions given by your supervisor or his/her delegate;
- c) comply with lawful directions;
- d) carry out your duties in a professional, competent and conscientious manner, while seeking suitable opportunities to improve your knowledge and skills, including through participation in relevant professional development;
- e) act honestly and in good faith in fulfilling your duties;

- f) be courteous and responsive in dealing with your colleagues, students, parents and members of the public;
- g) work collaboratively with your colleagues; and
- h) ensure that your conduct, whether during or outside working hours, is consistent with the ethos of the College and does not damage the reputation of the College.
- i) Dress in a professional manner that is appropriate for your role.

How to Comply

1. Inform the Principal if you are charged with or convicted of a serious offence. You must also inform the Principal if you become the subject of a Violence Restraining Order.
2. If, through your employment with the College, you become aware of a serious crime committed by another staff member, you are required to report it to the Principal, who may be required to inform the Police and/or the Department of Communities - Child Protection and Family Support Services and/or the Teacher Registration Board WA. If the breach is by the Principal the report should be made to the Chair of the College Board.
3. Report any concerns that you may have about the safety, welfare and well-being of a child or young person to the Principal, except in the case of Mandatory Reporting where the staff member should immediately follow the Mandatory Reporting Policy. If the breach is by the Principal then the report must be made to the Chair of the College Board.
4. In the case of Mandatory Reporting all teachers and school nurses, paid or unpaid are required by law to follow the Mandatory Reporting guidelines. Non-teaching staff must report all forms of abuse to the school Principal or if the school Principal is named in the allegation, to the Chair of the College Board.

Mandatory reporters must report a belief, formed on reasonable grounds in the course of their work, paid or unpaid, that a child or young person has been the subject of sexual abuse or is the subject of ongoing sexual abuse, to the Mandatory Reporting Service Department of Communities – Child Protection and Family Support Division.

When making a report, in good faith, about possible child sexual abuse, a mandatory reporter does not breach any employment related duty of confidentiality, professional ethics or standards and will not have engaged in unprofessional conduct.

A verbal report for Mandatory Reporting can be made, but must be followed by a written report as soon as practicable, preferably within 24 hours.

Mandatory reporters must specify the grounds on which they formed the belief that a child has been, or is being, sexually abused. It is important to provide as much detailed information as possible, including:

- what the child has said or done to suggest they are being sexually abused
- if the child has disclosed abuse, what they said happened and who they disclosed to and when
- a description of any behaviours/ interactions with the child that are of concern, including frequency and severity of behaviours
- whether the child has any injury, or medical needs.

2. What happens if I breach the Code of Conduct?

As a College employee, you hold a position of trust and are accountable for your actions.

- 2.1 Receipt of an allegation of child sexual abuse, including but not limited to sexual abuse, committed against a student by a staff member or student, or another person on the school premises or during school related activities, whether the abuse is alleged to have occurred recently or in the past must be reported.
- 2.2 Employees must report possible breaches as outlined in 2.1 to the Principal. If the possible breach is by the Principal then it must be reported to the College Chair of the Board.
- 2.3 Where the breach of the Code of Conduct involves suspected grooming or sexual abuse the Principal is required to inform the College Board and report to the Director General of the Department of Education as soon as practicable and in any event within 48 hours of the incident, in accordance with ***Critical and Emergency Incident Policy***.
- 2.4 The consequences of inappropriate behaviour and breaches of this *Code* will depend on the nature of the breach.
- 2.5 Factors the College may consider when deciding what action to take may include:
 - a) the seriousness of the breach;
 - b) the likelihood of the breach occurring again;
 - c) whether the employee has committed the breach more than once;

- d) the risk the breach poses to employees, students or any others; and whether the breach would be serious enough to warrant formal disciplinary action.

2.6 Actions that may be taken by the College in respect of a breach of the Code include Performance Management or remedial action, training or disciplinary action ranging from a warning to termination of employment, reporting of the matter to the Teacher Registration Board WA and the Director General of the Department of Education. The College will reserve the right to determine in its entirety the response to any breach of this Code.

3. Respect for people

The College expects employees to treat each other with respect and courtesy. Our daily interaction with others reflects on the College's reputation. Therefore, all employees are expected to be approachable, courteous and prompt in dealing with other people, including students, parents, other employees and members of the community.

Employees who work with students have a special responsibility in presenting themselves as appropriate role models for those students. Modelling effective leadership and respect in your interactions with students can have a profoundly positive influence on a student's personal and social development.

How to Comply

1. It is important for you to treat your colleagues, other employees, contractors, students and parents with respect. Do not use rude or insulting behaviour, including verbal and non-verbal aggression. Abusive, threatening, intimidating or derogatory language and physical abuse or intimidation is unacceptable. You must not use information and communication technologies, such as email, mobile phones, text or instant messaging, blogs, social media sites and other websites to engage in this type of behaviour.
2. You must not discriminate against, or harass for any unlawful reason, or bully for any reason any employee, contractor, student or parent. Your obligations in this

regard, including the list of unlawful reasons, are set out in the College's ***Discrimination, Harassment and Bullying Policy***. Unlawful harassment or discrimination may constitute an offence under the Equal Opportunity Act 1984 or federal industrial or discrimination legislation. Bullying may be a breach of your obligations under work health and safety legislation or your duty of care at common law.

3. You should ensure that you are aware of the schools [Discrimination, Harassment and Bullying Policy]. If you believe you are being unlawfully harassed or discriminated against or bullied:
 - (a) where you feel comfortable ask the person to stop, or make it clear that you find the behaviour offensive or unwelcome. It may be useful to speak with your supervisor or Department Head in the first instance to seek guidance on how to do this; and/or
 - (b) raise the issue as a grievance with the Principal as soon as possible after the incident(s) have occurred.
4. Do not lie about or exaggerate a complaint. If you lie about or exaggerate a complaint, the College will view this as a very serious matter, and you may be disciplined or dismissed.

4. Duty of care and work health and safety

As a College employee, you have a duty of care to students in your charge to take all reasonable steps to protect students from risks of harm that can be reasonably predicted.

The duty encompasses a wide range of matters, including (but not limited to):

- the provision of adequate supervision
- ensuring grounds, premises and equipment are safe for students' use
- implementing strategies to prevent bullying from occurring in College, and
- providing medical assistance (if competent to do so), or seeking assistance from a medically trained person to aid a student who is injured or becomes sick at College.

Duty of care

As a College employee, you have a duty of care to students in your charge. That duty is to take all reasonable steps to protect students from risks of harm that can be reasonably predicted. For example, risks from known hazards and from foreseeable risk situations against which preventative measures can be taken. The standard of care that is required, for example the degree of supervision, needs to be commensurate with the students' maturity and ability.

Duty of care to students applies during all activities and functions conducted or arranged by the College. The risks associated with any activity need to be assessed and managed before the activity is undertaken.

You should ensure that you are aware of the College's ***Duty of Care and Excursion Policies***.

Occupational health and safety

You also have a responsibility under occupational health and safety legislation to take care of your own health and safety at work. It is also your responsibility to ensure that your activities do not place at risk the health and safety of your co-workers, students or other persons that you may come into contact with at work.

Considerations of safety relate to both physical and psychological well-being of individuals.

You should ensure that you are aware of and comply with the College's ***Occupational Health & Safety Policy***.

How to Comply

1. You should take all reasonable steps to ensure that no student is exposed to any unnecessary risk of injury.
2. You should be familiar with and comply with the College's ***evacuation and/or lock down procedures***.
3. Students should not be left unsupervised either within or outside of class. You should be punctual to class and allocated supervision.
4. You should remain with students at after College activities until all students have been collected. In the event that a student is not collected you should remain with the student until collected, or seek advice from your supervisor.

5. Playground supervision is an integral part of the responsibility of staff. It must take precedence over other activities. It is unacceptable to be late. You should actively supervise your designated area, being vigilant and constantly moving around.
6. You should be alert to bullying or any other form of discriminatory behaviour, and report incidents to the appropriate staff member. Be familiar with the College ***Student Management/Discipline Policy***.
7. Ill or injured students should be attended to by the supervising staff member and Student Services advised as soon as possible.
8. You should ensure that you understand and comply with the College's ***policy in regard to the storage and administration of prescribed medication to students***.

6. Professional relationships between employees and students

As a College employee, you are expected to always behave in ways that promote the safety, welfare and well-being of children and young people. You must actively seek to prevent harm to children and young people, and to support those who have been harmed.

While not all employees are required to manage and supervise students, it is important for all College employees to understand and observe the ***College's child protection policies***.

How to Comply

Supervision of students

1. You should avoid situations where you are alone in an enclosed space with a student. Where you are left with the responsibility of a single student you should ensure that this is in an open space in view of others. Where this is not possible or practical it should be discussed with your supervisor and/or the Principal.
2. You should never drive a student in your car unless you have specific permission from your supervisor and/or the Principal and written permission from the parent

to do so. In the event of an emergency you should exercise discretion but then report the matter to your supervisor.

3. If you wish to conduct a private conversation with a student you should consider the time and venue carefully to avoid placing yourselves in a vulnerable situation. It is preferable to leave the door open. You should not locate yourself between the student and the door.
4. When confiscating personal items, such as mobile phones or jewellery, ask students to hand them to you.

Physical contact with students

1. You must not impose physical punishment or any form of corporal punishment on a student in the course of your professional duties.
2. When physical contact with a student is a necessary part of the teaching/learning experience you must exercise caution to ensure that the contact is appropriate and acceptable. You should seek reassurance from the student by asking for a volunteer if necessary to demonstrate a particular activity.
3. Attention to the toileting needs of young children should be done with caution. It may be appropriate to have the door open. For students with a disability the management of toileting needs should be included in the student's individual management plan.
4. When congratulating a student, a handshake, pat on the shoulder or a "high five" are acceptable as long as the student is comfortable with this action. Kissing of students is not acceptable.
5. Assessing a student who is injured or ill may necessitate touching the student. Always advise the student of what you intend doing and, if they are conscious, seek their consent.
6. Sometimes in ensuring duty of care you may be required to restrain a student from harming him or herself or others using reasonable force. Any such strategy must be in keeping with the College's behaviour management practices or individual student management plans. You should report and document any such incidents.

Relationships with students

1. You must not have a romantic or sexual relationship with a student. It is irrelevant whether the relationship is homosexual or heterosexual, consensual or non-consensual or condoned by parents or caregivers. You are reminded of:
 - a) the law prohibiting sexual relations with a person under the age of consent (16 years); and
 - b) the law prohibiting sexual relations between a teacher and his or her student under the age of 18 years.
2. You must not develop a relationship with any student that is, or that can be interpreted as having a personal rather than a professional interest in a student. An overly familiar relationship with any student (including any adult student) that you are responsible for teaching, tutoring, advising, assessing, or for whom you provide pastoral or welfare support raises serious questions of conflict of interest, trust, confidence, dependency, and of equality of treatment. Such relationships may also have a negative impact on the teaching and learning environment for other students and colleagues, and may carry a serious reputational risk for the College.
3. If you consider that a student is being overly familiar, seeking to establish a personal relationship with you or has developed a 'crush' on you, you should report your concerns to your supervisor and/or the Principal as soon as possible so that a plan can be developed to manage the situation effectively and sensitively.
4. At all times when speaking with students care must be taken to use appropriate language. You must always treat students with respect and without favouritism. There is no place for sarcasm, derogatory remarks, inappropriate familiarity or offensive comments.
5. You may, as part of your pastoral care role, engage in discussion with students. This is entirely appropriate. However you must be cautious about making personal comments about a student or asking questions that probe your own or a student's sexuality or relationships. You must not hold conversations with a student of an intimately personal nature where you disclose information about yourself.
6. You must not:
 - a) invite students to your home;

- b) visit students at their home; or
 - c) attend parties or socialise with students, unless you have the express permission of the Principal and their parents or care giver.
7. You must not engage in tutoring or coaching students from the College without the express permission of the Principal.
 8. You must not invite students to join your personal electronic social networking site or accept students' invitations to join their social networking site (see *Section 7 - Appropriate use of electronic communication and social networking sites*).
 9. You must not give gifts to students. You should also carefully consider your position before accepting any gift from a student or a parent (see *Section 10 - Declaring gifts, benefits and bribes*).
 10. Wherever practical, you should avoid teaching or being involved in educational decisions involving family members or close friends. Where it is not practical to avoid such situations completely, another member of staff should make any significant decisions relating to the student's assessments and have those endorsed by a supervisor.
 11. You should be aware of, and sensitive to, children with culturally diverse or indigenous backgrounds and cultural practices that may influence the interpretation of your behaviour.

Child protection

You must be aware of and comply with the College's ***Child Protection Policy and Mandatory Reporting*** requirements.

The requirements outlined in Section 6 in relation to Supervision, Physical Contact and Relationships with Students set professional boundaries in relation to your behaviour. They make clear what behaviour is unacceptable.

7. Appropriate use of electronic communication and social networking sites

The College provides electronic communication facilities for its students and employees for educational or administrative purposes. It monitors and views data stored or transmitted using

the College's facilities. By its nature, electronic communication is a fast and informal way of communicating. However, once a document or image has been sent there is no way to recall it and it exists forever.

How to Comply

1. You must comply with the College's ***Cyber-safety and Internet Policies***. This includes:
 - a) exercising good judgment when using electronic mail, following the principles of ethical behaviour;
 - b) using appropriate and professional language in electronic mail messages;
 - c) being aware that if an issue addressed in an email becomes the subject of a legal dispute, then those emails would be discoverable: that is, the court and all parties to the dispute would be entitled to see them;
 - d) not sending messages that are harassing, discriminatory, defamatory, threatening, abusive or obscene;
 - e) not inviting students into your personal social networking site or accept an invitation to theirs;
 - f) not using social networking sites to email or contact students;
 - g) remembering transmission, storage, promotion or display of offensive, defamatory, or harassing material is strictly forbidden; and
 - h) reporting any situations where you become aware of the inappropriate use of electronic communication and social networking sites.
2. You must never use the College's networks to view, upload, download or circulate any of the following materials:
 - a) sexually related or pornographic messages or material;
 - b) violent or hate-related messages or material;
 - c) racist or other offensive messages aimed at a particular group or individual;
 - d) malicious, libellous or slanderous messages or material; or
 - e) subversive or other messages or material related to illegal activities.

8. Use of alcohol drugs or tobacco

The College Ethos does not allow the use of alcohol at any College functions, including staff functions. The use of drugs is strictly forbidden.

How to Comply

General

As a College employee, you must consult with your supervisor or Principal if you are concerned about working with other employees who may be affected by drugs or alcohol.

Drugs

1. As a College employee, you must not have illegal drugs in your possession while at work. Any illegal drugs found on College property or in the possession of any person on College property may result in disciplinary action including the termination of your employment and referral to the Police and/or the Teacher registration Board WA;
2. You must not give students or other employees illegal drugs or restricted substances, or encourage or condone their use; and
3. You must not supply or administer prescription or non-prescription drugs to students unless authorised to do so.

Alcohol

1. You must not purchase alcohol for, or give alcohol to, any College student (or to any other person under the age of 18 years); and
2. You must not encourage or condone the use of alcohol by students of any age during educational activities.

Tobacco

1. You must not smoke or permit smoking in any College buildings, enclosed area or on College grounds. This includes all buildings, gardens, sports fields, cars and car parks.

2. You must not smoke whilst at any College function even if it is not on College campus. This includes, amongst all other activities, camps, tours and excursions.
3. You must not purchase tobacco or tobacco products for any College student, or give them tobacco or tobacco products.

9. Identifying and Managing Conflicts of Interest

Private interests can, or have the potential to, influence a person's capacity to perform their duties and in turn compromise their integrity and that of the College.

A conflict of interests can involve:

- a) pecuniary interests i.e. financial gain or loss or other material benefits;
- b) non-pecuniary interests i.e. favours, personal relationships and associations.

Conflict of interest also include:

- a) the interests of members of your immediate family or relatives (where these interests are known);
- b) the interests of your own business partners or associates, or those of your workplace; or
- c) the interests of your friends.

How to Comply

1. As a College employee, you must not act in conflict with the College's best interests.
2. When faced with a situation in which conflict of interests may be present, you should report any potential or real conflict to your supervisor or the Principal.
3. You should also report situations where a superior or colleague who has an identified conflict is, or may be perceived as, unduly influencing your decision.

10. Declaring Gifts, Benefits or Bribes

As an employee, you may be offered a gift or benefit as an act of gratitude. There are some circumstances when to refuse a gift would be perceived as rude, insulting or hurtful. You are expected to exercise sound judgment when deciding whether to accept a gift or benefit.

How to Comply

1. If you are offered a bribe (i.e. anything given in order to persuade you to act improperly), you must refuse it, explain why it is not appropriate, and immediately report the matter to the Principal.
2. Accepting gifts and other benefits has the potential to compromise your position by creating a sense of obligation and undermining your impartiality. It may also affect the reputation of the College and its staff. You must not create the impression that any person or organisation is influencing the College or the decisions or actions of any of its employees.

11. Communication and Protecting Confidential Information

You should be mindful of confidentiality when in discussions with parents. You cannot provide a guarantee of confidentiality if the matter under discussion requires mandatory reporting.

How to Comply

Communication

1. You should not disclose personal information about another staff member to students or parents or discuss their work performance, except if authorised by the Principal in the context of grievance resolution.
2. All matters discussed in staff meetings and staff memos are to be treated confidentially and not discussed with students, members of the College community, or the public.

3. The media should not be given access to students or allowed entry to the College without the express permission of the Principal. You should not make any comments to the media about the College, students or parents without the express permission of the Principal.

Confidential information

1. As a College employee, you must only use confidential information for the work-related purpose it was intended.
2. Unless authorised to do so by legislation, you must not disclose or use any confidential information without the express permission of the Principal.
3. You must make sure that confidential information, in any form, cannot be accessed by unauthorised people.

Privacy

1. You should always exercise caution and sound judgment in discussing the personal information of students, parents, staff and other people with other College employees. Normally information should be limited to those who need to know in order to conduct their duties, or to those who can assist in carrying out the College's work because of their expertise.

12. Record Keeping

All employees have a responsibility:

- a) to create and maintain full, accurate and honest records of their activities, decisions and other business transactions, and
- b) to capture or store records in the College's record systems.

How to Comply

1. You must not destroy or remove records without appropriate authority.
2. Supervisors have a responsibility to ensure that the employees reporting to them comply with their records management obligations.
3. Employees responsible for assessing and recording marks for students' work must do so accurately, fairly and in a manner that is consistent with relevant policy and the requirements of the College.
4. Employees must maintain the confidentiality of all official information and documents which are not publicly available or which have not been published.

13. Copyright and Intellectual Property

When creating material you need to ensure the intellectual property rights of others are not infringed and information is recorded about any third party copyright/other rights included in materials.

How to Comply

1. Advice relating to sharing or licensing the College's intellectual property should be sought from the Principal.
2. The College cannot give away or assign its intellectual property without the approval of the Principal.
3. If you develop material that relates to your employment with the College, the copyright in that material will belong to the College. This may apply even if the material was developed in your own time or at home.
4. You should not use the College's intellectual property (including copyright) for private purposes without obtaining written permission from the Principal.

14. Staff and Student Relationships

The following general principles and responsibilities are intended to guide the professional relationships intended between staff and students:

- Staff should avoid situations where they are alone in an enclosed space with a student. Where staff are left with the responsibility of a single student they should ensure that this is in an open space in view of others. Where this is not possible or practical it should be discussed with the Principal.
- Staff may as part of their pastoral care role engage in discussion with students. This is entirely appropriate. However staff must be cautious of making personal comments about a student or asking questions that probe their own or a student's sexuality or relationships.
- When staff wish to conduct a private conversation with a student they should consider the time and venue carefully to avoid placing themselves in a vulnerable situation. It is preferable to leave the door open. The staff member should not locate themselves between the student and the door.
- Staff should never drive a student in their car unless they have specific permission from the Principal to do so. In the event of an emergency staff should exercise discretion but then report the matter to the Principal.
- Staff should report to the Principal any suspected case of neglect and non-sexual abuse.
- Staff must not invite students nor accept invitations from students to join their personal social networking websites such as Facebook. Such communication can be problematic and could be regarded as inappropriate.
- Staff who communicate with students electronically should do so via the College email network. This communication should be for educational purposes only. Transmission of messages or files which are offensive is totally inappropriate and staff will be reprimanded/disciplined for such action.
- Staff should not engage in tutoring or coaching students from the College for monetary return.

- When physical contact with a student is a necessary part of the teaching/learning experience e.g. Physical Theatre training, sports coaching etc., staff must exercise caution to ensure that the contact is appropriate and acceptable. Staff should seek reassurance from the student by asking for a volunteer to demonstrate a particular activity.
- Attention to the toileting needs of young children should be done with caution. It may be appropriate to have the door open. In respect to students with a disability the management of toileting needs should be included in the student's individual management plan.
- Staff should not supply or condone the use of alcohol, tobacco or other drugs for themselves or any student in their care.
- When congratulating a student, a handshake is preferable but a pat on the shoulder or a "high five" may be acceptable as long as the student is comfortable with this action and other staff and students are present.
- Assessing a student who is injured or ill may necessitate touching. Always advise the student of what you intend doing and seek their permission. Carefully explain why this may be necessary.
- Staff must always treat students with respect and without favouritism. There is no place for sarcasm, derogatory remarks, inappropriate familiarity or offensive comments.
- Sometimes during the course of your work you may be in receipt of a gift from a student. In such circumstances where the receipt of a gift could be considered outside of usual custom you are to inform your immediate supervisor.
- Staff should ensure that they are familiar with and adhere to the College's policy in regard to the storage and administration of medical products to students.
- Sometimes in ensuring duty of care staff may be required to restrain a student from harming him or herself or others using reasonable force. Any such strategy must be in keeping with the College's behaviour management practices.

15. Response to Allegations of Staff Breaches to the Code of Conduct

The above mentioned Code of Conduct has a range of requirements, some of which are related to the College's unique culture and therefore matters of compliance and breaches of compliance may be addressed internally by the College Principal and Board. However, matters of 'Child Protection' relation to grooming, sexual abuse and Mandatory Reporting impose legal and professional obligations which must be observed and breaches of these must be responded to within a legal framework.

In summary:

- Where the breach of the Code of Conduct involves a violation of the Child Protection Standards and there are reasonable grounds to suspect grooming or sexual abuse the Principal is required to inform the College Board and the Principal must report to the Director General of the Department of Education as soon as practicable and in any event within 48 hours in accordance with **Critical and Emergency Incident Policy**. This will be done whether or not the College has sought legal and professional advice through the agency of its membership with AISWA.
- Where an allegation of grooming or child abuse involves a staff member, the complainant must be informed about advocacy, support and other services which may be available. This will be done after the College Principal has sought legal and professional advice through the agency of its membership with AISWA.
- The College will ensure that the relevant government authorities are consulted to determine when, what and by whom information relating to an allegation of child abuse and its investigation may be given to the person the subject of the allegation, the complainant, affected students and their parents and guardians, and the wider College community. This will be done after the College Principal has sought legal and professional advice through the agency of its membership with AISWA.
- The College will act in a manner which ensures that victims of alleged abuse receive the support they need once an allegation is made.
- The College will do everything within its power to ensure protection from victimisation or other adverse consequences for those who make a report in good

faith. Any victimisation that did occur would be promptly dealt with as a breach of Staff/Parent/Volunteer Code of Conduct.

Whilst at all times the College must act in the best interests and welfare of the children in its care, the College does also have an obligation of duty of care to the staff member implicated in a grooming or sexual abuse allegation. The staff member would be advised of the need to seek legal advice and the College Principal would ensure confidentiality of information is maintained whilst the matter is being investigated.

Appendix to this Code of Conduct

16. Understanding Grooming Behaviour

Grooming in a child protection context refers to deliberate actions undertaken to engage in sexual activity with a child. It differs from sexual abuse in that it is primarily a preparatory activity occurring before abuse occurs, but is continued during and after the abuse to ensure the safety of the groomer.

Grooming is a subtle, gradual, and escalating process of building trust with a child and those around the child, both children and adults, with the express purpose of the sexual gratification of the perpetrator, this generally involves engaging in sexual activity with the child. It is deliberate and purposeful and occurs both before and after the abuse. Abusers may groom children and supporting adults for weeks, months, or even years before any sexual abuse actually takes place. The grooming may occur in person, via cyber media and/or other forms of communication.

A committed offender will employ grooming behaviour from an early stage and because it is so subtle and gradual the child may not even be aware that the actual abuse when it occurs, is wrong or harmful. The grooming occurs with the child but also with those supporting networks around the child which might normally act as a deterrent or protective element. The perpetrator will invest significant energy and patience to minimise the risk of detection and exposure.

The groomer will employ manipulation, guilt, shame, bribery, coercion or exploit low self-esteem to psychologically manipulate the child. As a result the child becomes increasingly dependent on the groomer and increasingly alienated from protective elements including possible sources to disclose to. This is a deliberate strategy employed to maintain the secrecy of the abuse and to ensure the silence of the child.

The groomer will exploit any vulnerabilities of the protective elements around the child, including parent and family circumstances and school systemic weaknesses. Groomers are very adept at identifying anomalies, boundary ambiguities and any lack of systemic awareness, and then using them to deflect attention from their own actions and intentions.

While distinguishing between appropriate intent and inappropriate intent is often difficult, particularly for a child, it is essential that schools have very clear expectations and boundaries

around employee behaviours so that there can be rigorous accountability when dealing with staff.

Schools must work to improve their knowledge and understanding in this area so they are able to challenge existing practice, recognise unprofessional behaviour and build a shared understanding of what a safe school is.

Grooming behaviour with children may include, but is not limited to:

- Selecting and befriending a child and gaining his or her trust and then exploiting the child's vulnerabilities.
- Testing a child's boundaries through telling inappropriate jokes, roughhousing, backrubs, tickling, or sexual games.
- Moving from non-sexual touching to "accidental" sexual touching. This typically happens during play so the child may not even identify it as purposeful, inappropriate touching. It is often done slowly so the child is gradually desensitised to the touch.
- Manipulating the child to not tell anyone about what is happening. The abuser may use a child's fear, embarrassment, or guilt about what has happened. Sometimes, the abuser uses bribery, threats, or coercion.
- Causing the child to feel responsible for the abuse. Children may not notice or may become confused as the contact becomes increasingly intimate and sexual.

Grooming behaviour with adolescents may include additional strategies, such as:

- Identifying with the adolescent. The abuser may appear to be the only one who understands him/her.
- Displaying common interests in sports, music, movies, video games, television shows, etc.
- Recognising and filling the adolescent's need for affection and attention.
- Giving gifts or special privileges to the adolescent.
- Allowing or encouraging the adolescent to break rules (e.g., smoking, drinking, using drugs, viewing pornography).
- Communicating with the adolescent outside of the person's role (e.g., teacher, or coach). This could include, for example, texting or emailing the teen without the parents' knowledge.

In addition to grooming the child, the groomer will use deflection strategies to remain unchallenged. Some of these strategies may include where the perpetrator:

- promotes self and creates a reputation as caring, child-loving, competent, available, trustworthy, truthful
- raises doubts about the motives, mental health, reliability of the child or anyone else who might approach support services with allegations
- fosters dependency as someone the family can rely on
- positively represents child to others so as to be perceived as someone who would never harm the child.

Preventing or interrupting the grooming process:

Schools unfortunately provide a vast array of opportunities for groomers to enact the grooming process. Some abusers have a particular preference for children within particular age bands and some studies have shown that groomers will take child focussed employment primarily to get access to a particular cohort of children.

Within a school context, holding all staff members accountable to the school Code of Conduct and challenging boundary crossings and violations is one of the most effective strategies to combating grooming behaviour.

17. Student Management Policy

Staff will adhere to the Student Management Program as outlined in the Staff Handbook.

The College explicitly forbids the use of any form of child abuse, corporal punishment or other degrading punishment

These terms are defined as:

Degrading punishment

Any punishment which is incompatible with respect for human dignity, including corporal punishment and non-physical punishment which belittles, humiliates, denigrates, scapegoats, threatens, scares or ridicules the child (from UN Committee on the Rights of the Child, General Comment No. 8 (2006), paragraphs 11 and 16: CRC/C/GC/8, 2 March 2007).

Child abuse

Four forms of child abuse are covered by WA law:

- 1) Physical abuse occurs when a child is severely and/or persistently hurt or injured by an adult or a child's caregiver.
- 2) Sexual abuse, in relation to a child, includes sexual behaviour in circumstances where:
 - a) the child is the subject of bribery, coercion, a threat, exploitation or violence;
 - b) the child has less power than another person involved in the behaviour; or
 - c) there is a significant disparity in the developmental function or maturity of the child and another person involved in the behaviour.
- 3) Emotional abuse includes:
 - a) psychological abuse; and
 - b) being exposed to an act of family and domestic violence.
- 4) Neglect includes failure by a child's parents to provide, arrange or allow the provision of:
 - a) adequate care for the child; or
 - b) effective medical, therapeutic or remedial treatment for the child.

Coropral Punishment

Any punishment in which physical force is used and intended to cause some degree of pain or discomfort, however light; typically involving hitting the child with the hand or with an implement; can also include, for example, forcing the child to stay in an uncomfortable position. It does not include the use of reasonable physical restraint to protect the child or others from harm: from UN Committee on the Rights of the Child, General Comment No. 8 (2006), paragraphs 11 and 15: CRC/C/GC/8, 2 March 2007.

Related Policies:

Critical and Emergency Incident Policy

Discrimination, Harassment and Bullying Policy

Duty of Care Policy

Occupational Health and Safety Policy

Evacuation and Lockdown Policy

Student Management Policy

Storage and administration of prescribed medication Policy

Child Protection and Mandatory Reporting Policy

Cybersafety and Internet Policies

All these policies are in the Staff Handbook

