





Child Protection Policy

(Including Mandatory Reporting of Child Sexual Abuse,
Grooming and Child Abuse Prevention)

	Ratified by Council	Reviewed by Principal
Date	February 2022	April 2023
Name	Justin Coombs	Jenny Dougan
Signature		

West Coast Steiner School is committed to being a Child Safe Organisation, taking a preventative and participatory stance on child protection issues and promoting a child safe environment based on the National Principles for Child Safe Organisations.

PROVENANCE					
Review Cycle	1 year	Last Review	April 2023	Next Review	January 2024
Responsibility	School Principal				
Related Policies and Procedures	<div> <div> Code of Conduct for Staff Code of Conduct for Parents Code of Conduct for Students Privacy Policy Duty of Care Policy Pastoral Care Policy Behaviour Development Policy Bullying Prevention Policy Risk Management Policy Staff Grievances Policy Student Complaints Policy Student Complaints Procedure </div> <div> Concerns and Complaints Management Policy Child Safe Statement of Commitment Contractor Management Policy Visitors and Volunteers Policy Work Health and Safety Policy Incursions, Excursions and Camps Policy Critical Incident and Emergency Management Plan ICT Acceptable Use Policy Electronic Devices and Social Media Policy Photographing, Filming, Recording Students Policy </div> </div>				
Relevant Legislation and Authority	School Education Act 1999 School Education Regulations 2000 Working with Children Act 1988 Privacy Act 2020 Children and Community Services Act 2004 National Principles for Child Safe Organisations				
Appendix	A: Child Safe Statement of Commitment B: Recognising Signs of Child Abuse C: The Role of the Department of Child Protection and Family Support and WA Police D: Responding to a Disclosure of Abuse or Neglect E: Understanding Grooming Behaviour				

VERSION MANAGEMENT		
Date	Changes Made	Author
May 2018	Policy reviewed. Revisions from AISWA Child Protection Guidelines Version 5 March 2018 incorporated.	A Gernaat
December 2021	Policy revised. Prevention of Grooming and Protective Behaviours incorporated into Child Protection Policy. Policy applied to all employees, Council members, practicum students, parents/carers, volunteers and contractors.	L Lane
January 2022	Updated with National Principles for Child Safe Organisations.	L Lane
April 2023	Reportable Conduct Scheme information included following the commencement of WA Reportable Conduct Scheme in January 2023. Students with disability and sexual abuse indicators added to Appendix B Reference to Gazette replaced with School Newsletter.	L Lane

Policy

Background

West Coast Steiner School (WCSS) is committed to providing a child-safe environment which safe guards all students in accordance with the National Principles for Child Safe Organisations. This commitment underpins all school practices which provide for the safety, wellbeing and welfare of our children and young people. West Coast Steiner School expects all school community members including staff, students, Council members, practicum students, volunteers, visitors and contractors to share this commitment, as expressed in our *Child Safe Statement of Commitment* (see Appendix A).

West Coast Steiner School supports the rights of children to feel safe at school and in the wider community. As a school, we are in a unique position of responsibility and authority and must make every effort to provide a child safe environment and maintain zero tolerance for child abuse. WCSS explicitly forbids the use of any form of child abuse, corporal punishment or other degrading punishment. All employees and volunteers at the WCSS have a duty of care to protect children when they are on school premises and also to intervene when they believe the welfare of a child is at risk outside the school. This responsibility extends to the identification and timely response to concerns regarding the possible sexual, physical, psychological and emotional abuse or neglect of a child.

On the 1st January 2009, the Western Australian government introduced new legislation that requires various occupations, including teachers, to report on child sexual abuse. This legislation is the Children and Community Services Amendment (Reporting Sexual Abuse of Children) Act 2008 and is an amendment to the Children and Community Services Act 2004. Every member of the school community has an important role in the identification and reporting of child abuse and the provision of support and assistance to children who have been abused.

West Coast Steiner School staff are vigilant in their care of all students. Staff are aware of their responsibility to report suspected incidents of abuse or neglect, or disclosures of abuse or neglect, to the Principal. All reports of any form of abuse will be taken seriously. Clear guidelines for the response and management of incidents have been established to ensure staff, students and parents are supported at such a critical time.

All West Coast Steiner School staff are required to complete training in the Mandatory Reporting of Child Sexual abuse and undertake annual retraining in the requirements of reporting and their responsibility to report.

West Coast Steiner School staff are also responsible for assisting children to develop protective behaviours so that they have the knowledge and skills to manage their own safety. This includes educating children about their rights and responsibilities under the *Code of Conduct for Students* and how to express a concern or complaint through the School's child-friendly *Student Complaints Procedure*.

Policies, procedures and organisational structures that support the health, safety and wellbeing of all students are clear, thorough and understood by staff through a process of training and ongoing review. This includes our human resource practices and procedures when employing new staff, hiring contractors and using volunteers at the School, to ensure that they are adequately screened, trained and supervised. (see *Contractor Management Policy* and *Visitors and Volunteers Policy*).

The school community will be kept informed of policies and procedures related to child protection and will be expected to comply with the relevant *Codes Of Conduct*, which clearly outline the rights and responsibilities of students, staff, Council members, practicum students, parents, volunteers and contractors.

Purpose

West Coast Steiner School is committed to providing a child safe and child friendly environment, where children and young people are safe and feel safe, and are able to actively participate in decisions that affect their lives. All members of the School community have a responsibility to understand the important role they play individually and collectively to ensure the wellbeing and safety of all students. The purpose of the Child Protection Policy (the Policy) and associated procedures is to outline to the West Coast Steiner School community how the School promotes and maintains the safety and welfare of children.

Application

This Policy applies to and is binding upon all employees, Council members, practicum students, parents, volunteers and contractors of West Coast Steiner School. For the purpose of this Policy '*parent*' includes legal guardians, step-parents, foster parents, carers and grandparents.

This Policy recognises that the best interests of children will be met by collaborating with or engaging the expertise of government agencies or non-government departments in accordance with the protocols recommended by these bodies.

Definitions

Child Abuse

Four forms of child abuse are covered by WA law are defined by the Department of Communities:

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.

Corporal 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)

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).

Reportable Incident

Reportable Incidents are a subset of critical and emergency incidents reported to a school's governing body, that must additionally be reported to the Director General of Education. The Principal will report all 'reportable incidents', as soon as possible within 48 hours, to the Director General using the critical and emergency incident report form available from the Department of Education's website.

The following are reportable incidents:

1. The death of a student, staff member or visitor who is at school or during a school-related activity or following an incident at school or during school-related activity.
2. An actual or potential injury, illness or trauma of a student, staff member or visitor who is at school or during a school-related activity or following an incident at school or a school-related activity and where the incident has resulted or may result in significant impact.
3. An incident requiring a police or other emergency services response when a student appears to have been taken or removed from school or from a school-related activity without proper authority or goes missing and cannot be accounted for.
4. An incident requiring the school to be locked down or to evacuate staff and students, or reduce the number of students or staff attending, or to close for any duration for health or safety reasons.
5. The receipt of a complaint or allegation of child abuse, and including but not limited to sexual abuse, committed against a student by:
 - (a) a staff member or another student or
 - (b) another person on the school premises or during a school-related activity; whether the abuse is alleged to have occurred recently or in the past.
6. Issuing a formal warning, a suspension or ceasing the employment of a staff member for a breach of the school's Code of Conduct involving suspected grooming behaviour.

Policy Review and Dissemination

This policy and related procedures will be made available to the public and staff on the School website and is available to staff in the Policies and Procedures folder in Reception. The School Community will receive reminders to refer to this policy (and updated versions) through the School Newsletter.

All staff will be directed to read this document at the first staff meeting at the commencement of the school year. New staff will be informed of this policy as part of the School's Induction Program. The School will provide ongoing annual training to ensure that staff understand their responsibilities under the Policy.

The School may, at any time, make amendments to this policy to ensure continuous improvement. If changes are made prior to the scheduled review they will be noted in the Version Management table of the policy and communicated to the School community as appropriate. The policy will be formally reviewed annually by the School Principal.

Creating a Culture of Safety

West Coast Steiner School's commitment to creating a culture of care for children's safety and wellbeing, is underpinned by the National Principles for Child Safe Organisations.

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the National Child Safe Principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

The following Guidelines have been created as part of the School's culture of safety. All WCSS employees, Council members, practicum students, volunteers and contractors are expected to adhere to these Guidelines.

- All staff, Council members, contractors and volunteers engaging in child related work and activities at the School must have a current Working With Children Check (WWCC). The WWCC must be presented to the School and a copy taken prior to commencement of any work at the School. The School will keep a copy and maintain a register of all WWCC and will check validity of all WWCC on an ongoing basis.
Where a WWCC is not required under law, the School may request a National Police Check or Reference Checks for Volunteers to assess any risks.
- Parents volunteering for overnight activities with their child are required to provide a WWCC to the School.
- All employees are required to provide two professional references which will be checked prior to commencement.
- New employees will participate in an induction and orientation process to familiarise themselves with relevant policies and procedures.
- Where practicable, staff will avoid being alone with any child (excluding one's own children) in an area that cannot be seen or observed by another staff member or adult.
- Do not engage in inappropriate or unnecessary physical conduct or behaviours, including doing things of a personal nature that a student can reasonably be expected to do for themselves considering age and ability, such as toileting or changing clothes. Physical force must never be used other than to safeguard against immediate physical danger, such as separating students engaged in a physical altercation.
- Any form of sexual conduct with a student, including making sexually suggestive comments, sharing sexually suggestive material or grooming, is prohibited under any circumstance.
- Verbally or psychologically abusing or denigrating students publicly or privately or attempts to control or manipulate students through psychological means is prohibited under any circumstance.
- Forbidding a student from sharing conversations or information with parents/carers or staff or instructing students to "keep secrets" from their parents/carers is prohibited under any circumstance.
- Sexual attention towards others in the form of remarks, jokes or innuendos, including threats of such behaviour is prohibited under any circumstance.

- Displaying, distributing or sharing any demeaning, suggestive, objectionable or pornographic material is prohibited under any circumstance.
- There must be no indirect or explicit invitations to engage in inappropriate, suggestive or sexual activities which may or may not include a promise to reward for complying, or a threat of reprisal for not complying.
- Do not transport a student or students in their private vehicle. Exceptions to this include being the designated emergency backup driver on a school camp (see *Incursions, Camps and Excursions Policy*) or where a staff member is transporting their own child who attends the school or their child's friends with the permission of their parents.
- Do not engage in inappropriate personal communications with a student through any medium, including any online contact or interactions with a student.
- Do not take or publish (including online) photos, movies, or recordings of a student without parental/carer consent (see *Photographing, Filming and Recording Students Policy*).
- All employees are required to sign they have read the School's *Code of Conduct for Staff* in acknowledgement of their commitment to adhere to the Code.

WCSS implements the National Principles for Child Safe Organisations WA: Self-assessment and Review Tool to audit its practices every second year. The Principal ensures that any areas that need to be addressed are included in the School's Improvement Plan for that cycle.

This Policy is implemented in conjunction with other policies and practices to give clear guidelines for staff in providing a high level of care and safety for our students and reporting requirements. Other related policies and procedures include, but are not limited to: Child Safe Statement of Commitment, Codes of Conduct, Duty of Care Policy, Pastoral Care Policy, Behaviour Development Policy, Bullying Prevention Policy, Risk Management Policy, Student Complaints Policy, Student Complaints Procedure, Concerns and Complaints Management Policy, Contractor Management Policy, Visitors and Volunteers Policy, Critical Incident and Emergency Management Plan, Incursions, Excursions and Camps Policy, Electronic Devices and Social Media Policy and Photographing, Filming, Recording Students Policy.

Child Abuse

Child abuse refers to any non-accidental behaviour by adults or children that is outside the norms of conduct and entails a substantial risk of harm to a child or young person. The behaviours may be intentional or unintentional.

It may be the result of action or inaction on the part of a person who has responsibility to care for a child resulting in harm or injury to the child. The harm may include delayed physical and/or intellectual development. The abuse experienced is normally described in five categories.

1. Physical
2. Sexual
3. Emotional including psychological
4. Neglect
5. Family and domestic violence.

Sexual abuse occurs when a child is used by an adult, another child or adolescent for his or her own sexual stimulation or gratification. These can be contact or non-contact acts, including grooming by perpetrators, inappropriate touching, penetrative abuse, exposure to pornography and accessing child pornography.

Physical abuse occurs when a person purposefully injures or threatens to injure a child. The abuse can take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

Emotional/Psychological abuse occurs when a child is repeatedly rejected or frightened by threats. The abuse can involve name calling, being put down or continual coldness from a parent or caregiver to the extent where the behaviour of the child is disturbed or their emotional development is at serious risk of being impaired.

Neglect occurs when there is a failure to provide a child with the basic necessities of life, such as food, clothing, shelter, supervision, medical attention or care to the extent that the health safety, or development of the child is significantly impaired or placed at risk.

Exposure to **Domestic Violence** occurs when a child witnesses or experiences the chronic domination, coercion, intimidation and victimisation of one person to another by physical, sexual or emotional means within a domestic relationship or in the home environment.

Abuse and neglect may be more commonly seen in families where the following social factors are present:

- intergenerational patterns of abuse
- unsupported and unstable family structures (e.g., single-parent families, domestic violence)
- social stressors (unemployment, poverty, poor housing)
- social isolation and low community involvement, and/or
- barriers to accessing resources due to language, culture, religion, or migration status.

However, child abuse can affect any child in any circumstance. Each category of abuse is described by a range of indicators listed in *Appendix B: Recognising Signs of Child Abuse*.

Forming a Belief on Reasonable Grounds

A person may form a belief on reasonable grounds that a child is in need of protection after becoming aware that a child or young person's health, safety or wellbeing is at risk and the child's parents are unwilling or unable to protect the child.

There may be reasonable grounds for forming such a belief if:

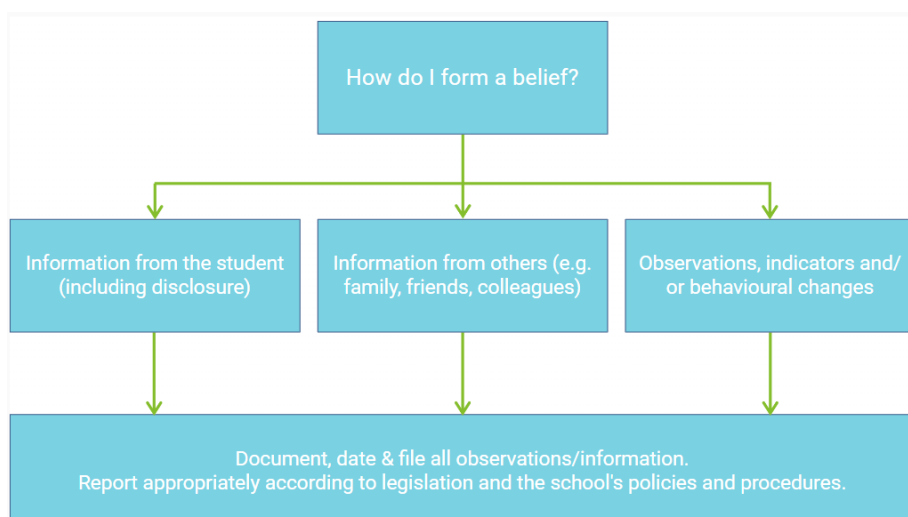
- a child or young person states that they have been physically, emotionally or sexually abused;
- a child or young person states that they know someone who has been physically, emotionally or sexually abused (sometimes the child may be talking about themselves);
- someone who knows the child or young person states that the child or young person has been physically, emotionally or sexually abused;
- a child shows signs of being sexually, physically, emotionally abuse, including non-accidental or unexplained injury, persistent neglect, poor care or lack of appropriate supervision.
- the staff member is aware of persistent family violence or parental substance misuse, psychiatric illness or intellectual disability that is impacting on the child or young person's safety, stability or development;
- a child's actions or behaviour may place them at risk of significant harm and the child's parents are unwilling or unable to protect the child.

Forming a belief may involve receiving and observing various pieces of information, and may also include more than one staff member. It is important that this information is stored safely and only involve those people who are involved on a need-to-know basis. This will assist in understanding and forming a clearer picture regarding the situation.

At WCSS, staff must use their professional judgement in forming a belief based on reasonable grounds and may consult with the Principal, or the School Chair if it is not appropriate to discuss it with the Principal.

Once a suspicion/reasonable belief has been formed, a report must be made to the Department of Communities, Child Protection and Family Support (DCCPFS), which is the government department with the statutory authority to investigate child protection concerns in Western Australia. See Appendix C for further information about the role of the DCCPFS.

Hard evidence is not required to make a report and a person must not in any way investigate or attempt to determine whether abuse has occurred. Investigations are undertaken by the DCCPFS and/or the Police.



Reporting of Child Abuse

There are two main forms of child abuse reporting in Western Australia (WA):

- Mandatory reporting of Child Sexual Abuse in WA (by Mandatory Reporters only to DCCPFS Mandatory Reporting Service);
- Reporting child abuse/concerns for all other forms of abuse and neglect (by any Non-Mandatory Reporters and Notifiers to the Central Intake Team at the DCCPFS).

Mandatory Reporters

Teachers and Boarding Supervisors
Child Care Educators (if registered with the TRBWA)
Ministers of Religion
Nurses, Midwives, Doctors
Police Officers

Non-Mandatory Reporters and Notifiers

Education Assistants
School Psychologists/Counsellors
School Support Staff - grounds staff, cleaners
administration staff
Volunteers

Making a Mandatory Report at WCSS

Mandatory reporters must report a belief, based on **reasonable grounds** in the course of their work, paid or unpaid, that **child sexual abuse** has occurred or is occurring. This means that teachers working outside of the school grounds are also required to report when working in either a paid or unpaid capacity, such as tutoring or volunteer teaching at youth centre.

The Principal **may** be involved in discussions prior to the teacher forming a belief based on reasonable grounds but it is the teacher's responsibility to make the report directly to the Mandatory Reporting Service once a reasonable belief that sexual abuse has occurred, or is occurring, has formed.

If mandatory reporters have not formed a belief about child sexual abuse, concerns should still be reported to the Central Intake Team at the DCCPFS as a child abuse concern. The DCCPFS can be contacted on 1800 273 889 for advice, if a mandatory reporter is unsure whether to report.

How Is A Mandatory Report Made?

A centralised Mandatory Reporting Service (MRS) has been established by DCCPFS to receive all reports of child sexual abuse in Western Australia. This service operates 24 hours a day, 7 days a week. There is a maximum penalty for failing to make a mandatory report of \$6,000.

A mandatory reporter may make a **verbal report** first if the matter is urgent or immediate safety may be at risk by calling Mandatory Reporting Service on **free call 1800 708 704**.

By law, a mandatory reporter must also lodge a written report. Failing to submit a written report following a verbal report may result in a \$3,000 penalty.

A **written mandatory** report can be lodged using the DCCPFS secure Mandatory Reporting Web System <https://mandatoryreporting.dcp.wa.gov.au/Pages/MakeaReport.aspx>

Information to be provided under legislation

- reporter's name and current contact details
- name/s of the child, or if not known, a description of them
- grounds on which the reporter's belief of child sexual abuse has been formed.

Information that must be provided if known

- the child's date of birth
- the child's current address
- the names of the child's parents or other responsible persons.

The MRS may ask about the child's current whereabouts, contact numbers, child's educational setting/location, cultural background, the child's family arrangements, name of the person alleged to have harmed the child (if known), any known threats to further harm, and whether child and family/carers are aware of the report.

Where a belief that the child is at imminent risk of being abused, consider calling the Western Australian Police first, through the 000 or the 131 444 numbers. This must be followed up by making a Mandatory Report.

Once a written report has been submitted, a receipt number is generated and sent via email to the mandatory reporter. This must be stored securely in case it is needed for future reference. If a new concern or belief is formed, a new Mandatory Report should be submitted.

Reportable Incidents

At WCSS, a mandatory reporter is required to inform the Principal when they have made a Mandatory Report and to provide the report number, date and details in confidence. When the Principal or Chair of Council knows that a Mandatory Report has been made in regard to a student at WCSS, and the incident meets the definition of an allegation against a staff member, another student, or another person on the school premises or during a school-related activity, it must be reported as a Reportable Incident to the Director General of the Department of Education within 48 hours of the incident.

The description of the incident in the notification to the Director General need only record that a Mandatory Report has been made and provide the report receipt number. The identity of the persons involved, and the identity of the mandatory reporter, must not be disclosed on the form.

Additional reports will need to be provided to the TRBWA (for teaching staff only) and the Ombudsman under the Reportable Conduct Scheme, which commenced in Western Australia on 1 January 2023 and requires schools to notify reportable conduct pertaining to sexual and physical abuse within seven working days after a reportable allegation or reportable conviction is made.

Processing of the Mandatory Report

Once a Mandatory Report has been lodged, the MRS will assess the immediate risk to the child, and determine the need for further child protection assessment and investigation. A copy of the report is sent to the WA Police. The Police determine if they need to be involved on a case by case basis.

The mandatory reporter will receive a feedback letter advising them of the DCCPFS District Office to which the report has been referred. It is important to note that all reports are actioned by DCCPFS, but it may not be the response that the reporter expects. Principals may discuss ongoing concerns with DCCPFS and are encouraged to maintain clear lines of communication with the DCCPFS District Office. If new information becomes available to the reporter, this information should be submitted to DCPFS.

Confidentiality and Legal Protection

The identity of the reporter is required to be kept confidential, except in limited and very specific circumstances. This includes information where a reporter's identity could be deduced. There are exceptions where disclosure of a reporter's identity is permitted. In such cases, consideration will be given to ensuring the reporter's safety has been taken into account.

Examples of when a reporter's identity may be revealed include:

- the Mandatory Reporting Service must send a copy of every written report to the WA Police;
- WA Police may need to reveal a reporter's identity in order to investigate or prosecute a suspected offence;

- a Department For Child Protection officer may need to reveal the reporter's identity when certain child protection, family law or adoption proceedings are taking place;
- the reporter may have provided written permission for their identity to be disclosed.

In cases of child sexual abuse, legislation provides protection for the person reporting. If a report is made in good faith, they will not incur any civil or criminal liability by making a report

Disclosure of the reporter's identity or identifying information to parents or any other party can incur a fine of \$24,000 and two years' imprisonment.

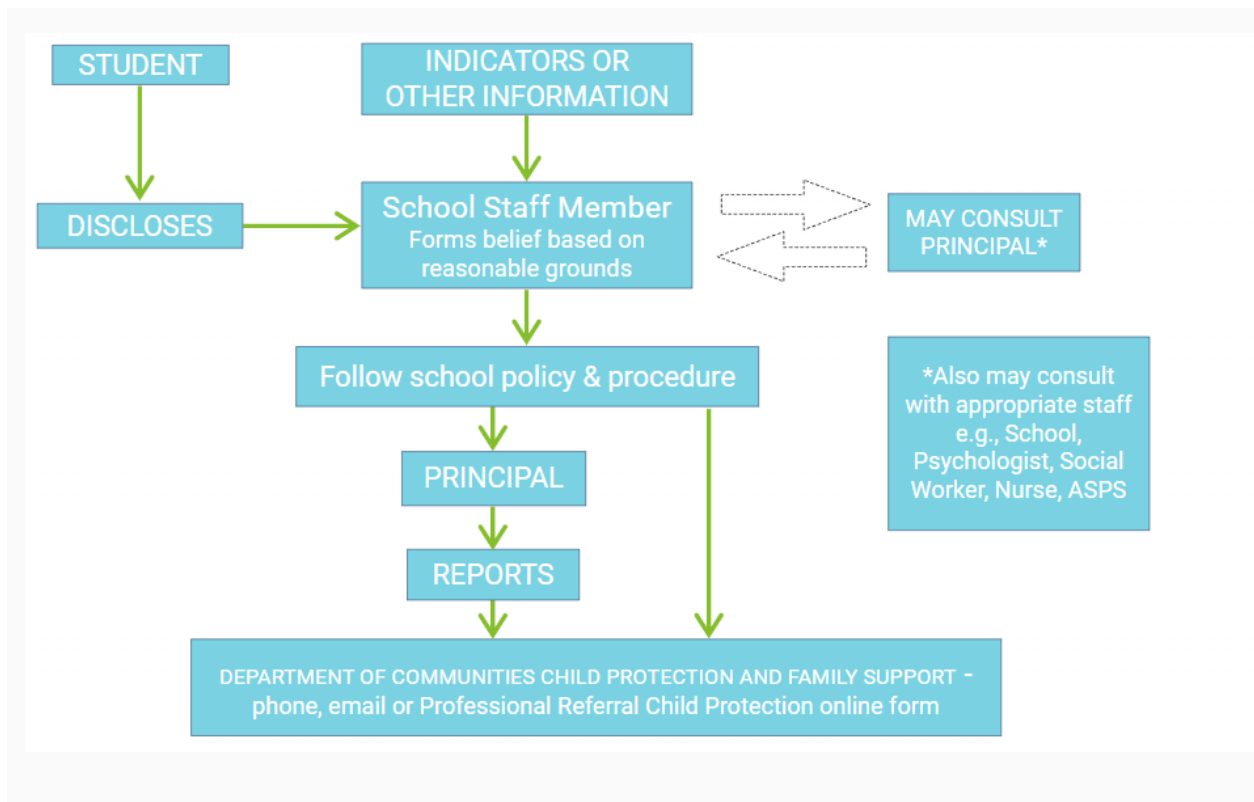
Consent from the MRS must be given prior to any parental contact being made and whether any information can be shared (and with whom).

Reporting of Physical, Emotional or Psychological Abuse, or Neglect

At WCSS, the staff member who has made observations or received a disclosure should discuss these with the Principal, or the School Chair if it is not appropriate to discuss it with the Principal. The teacher and Principal may wish to consult with the school psychologist or a member of the Non-Government Schools Psychology Service. It is vital to remember that confidentiality is paramount and that disclosure of this information should only be discussed with those in the School who are required to know.

Reporting of child abuse/concerns for all other forms of abuse and neglect can be reported by any staff member to the Central Intake Team (CIT) on 1800 273 889 or by email on cpduty@cpfs.wa.gov.au at DCCPFS.

The diagram below outlines the notification procedure for child abuse and neglect (for non-mandatory reports).



If you are concerned about the welfare of a child or young person after business hours, call Crisis Care at DCCPFS. Staff are available 24/7 and can respond to concerns across Western Australia.

Crisis Care 9223 1111 or 1800 199 008

Remember, your role is to report, not decide or investigate. Allow the authorities to make the decisions about the immediate safety needs of the child.

Responding to a Disclosure of Abuse or Neglect

If a student makes a disclosure of abuse or neglect, staff should be aware of the immediate needs of the student and know what to do in these circumstances. (See *Appendix D: Responding to a Disclosure of Abuse or Neglect*)

Children will rarely use adult language or specific terms when disclosing abuse, the language used will be at the developmental level of the child, so staff may not initially pick up the nuances of the disclosure. Most disclosures are accidental; that is the child did not intend to disclose, and it is likely that the disclosure will only be partial. Staff should not attempt to elicit a full disclosure, or ask direct questions. The child should be encouraged to speak freely, i.e. a free narrative, but staff should not try to direct the child.

The following strategies could be used if you are not clear as to what you have heard or need to clarify a piece of information. Use open-ended questions rather than “Can you....” at the beginning of the question or T.E.D question stems such as Tell me more about...Explain to me...Describe to me...

Do not question the child further if:

- the child is unwilling
- once clarification has been established or
- it becomes clear that abuse has occurred or is occurring.

Staff must respect the confidentiality of the disclosure. Any information provided must not be shared with anyone other than the Principal and either the DCCPFS or WA Police.

Following a Disclosure or Report of Abuse

Following consultation with DCCPFS the Principal will notify parents immediately if there is a concern raised about their child. This should occur **except** where it is possible the abuse is intra-familial abuse and the parents are the alleged perpetrators. All strong concerns for the welfare of children believed maltreated by parents must be discussed with the DCCPFS or the Police Child Abuse Squad before advising parents. These agencies will then decide on the provision of advice to and any further action.

If, following a report, a family approaches the School to receive support for their child, the interview is to be conducted by the Principal and one other staff member to provide support.

A disclosure could elicit strong feelings of shock, anger and helplessness. As it is important to understand these feelings, the School will provide an opportunity for these to be worked through after the disclosure. Ongoing support is available from the School Counsellor or School Principal for the student, the teacher, and anyone else affected. The need for ongoing support is often necessary as the teacher will continue in their role with the student and the DCCPFS role may continue for an extended period of time.

Records and Privacy

Records of complaints, allegations and findings related to grooming and child abuse, whether involving former or current staff or students should contain as much detail as possible, be securely stored and not destroyed without the approval of the Director-General in accordance with Non-Government Schools Registration Standards.

Grooming Behaviours

Legislative requirements require schools to put in place measures for staff to understand and be alert for grooming behaviours in order to provide a safe environment for our children, and for staff to raise concerns around unprofessional 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. A description of grooming behaviours can be found at *Appendix E: Understanding Grooming Behaviour*.

Strong concerns of grooming behaviours will be reported according to the non-mandatory reporting procedures. When an employee is investigated for grooming behaviours, the Principal is obligated to report this to the Director General of the Department of Education as a Reportable Incident, the Ombudsman and the TRBWA.

Preventing or Interrupting the Grooming Process

Organisations 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's Code of Conduct and challenging boundary crossings and violations is one of the most accessible strategies to combat grooming behaviour. At West Coast Steiner, all staff members are accountable to the Code of Conduct for Staff. Employees and volunteers, and others, are expected to have very clear understandings of the expectations around interactions with students and processes for reporting concerning behaviours.

Recruitment and Training

- The School provides a statement in vacancies for the purpose of recruitment that it is a Child Safe Organisation.
- The School ensures that all staff provide proof of a current Working With Children Check.
- All staff attend annual training on Child Protection, including grooming and reporting.
- All staff are made aware of the legal requirements to report on child sexual abuse.

Teaching

- Staff are frequently reminded that meetings with an individual student should always take place in the presence of a second staff member. Where this is not practical, staff should ensure that they meet a student in a more public space and provide open access and line of sight to the conversation.
- Situations that require one to one instruction between an educator/School Counsellor and child should be carefully considered, and where **possible and practicable** take place in an area with a clear line of sight.

Education

- As part of the Protective Behaviours Curriculum, students are informed that all staff and parents heed the Child Protection Policy, and are instructed how they can make a disclosure.
- The School informs parents who volunteer to participate in class camps and excursions that WCSS is a Child Safe Organisation. They are provided with the Child Protection Policy as mandatory reading as part of the volunteers induction process (see *Visitors and Volunteers Policy*).
- The School includes information on Child Protection in the School Newsletter to educate the community.

Protective Behaviours Education Curriculum for Children

Non-Government Registration Standards require schools to provide protective behaviours and sexual abuse prevention education to all students.

At West Coast Steiner School, the School Principal or Deputy Principal, in collaboration with the Faculty, is responsible for ensuring that the school curriculum covers a comprehensive, realistic and age-appropriate personal safety component enabling students to recognise and report abuse, understand power in relationships, and develop protective strategies, including seeking help.

The Keeping Safe: Child Protection Curriculum is taught from Kindy to Year 6 to help students develop knowledge and skills to help manage their own safety. Parents are informed of the Protective Behaviours Program curriculum content to support them in continuing the dialogue at home.

We recognise that while such programs can help children to develop useful skills, it is not reasonable or realistic to expect children to be able to guarantee their own safety in most cases. The safety of children remains at all times an adult responsibility.

The following can be usefully integrated into day-to-day practices as part of creating a culture of safety;

- encouraging the use of correct terminology for all body parts
- encouraging children to identify and discuss feelings in a variety of situations
- encouraging questioning and decision making skills
- respecting children's decision and choices about touch and encouraging them to respect other children's choices
- encouraging children to distinguish between situations where they feel safe and don't feel safe
- providing an environment where children know their questions and concerns are listened to.

Cyber Safety

In keeping with Steiner Education principles, West Coast Steiner School discourages the use of technology for children. However, we recognise that the internet is increasingly becoming more available to primary aged students as one of the main sources of communication. Although this is most likely to occur outside of WCSS, it is still a potential issue for the School. The popularity of various social media, as well as chat rooms, discussion groups and interactive games makes them a very attractive place for predators as they can remain virtually anonymous whilst participating in a range of paedophilic activity. There are significant concerns in this area, and schools, parents and students need to be informed consumers of this space.

The Criminal Code Amendment (Cyber Predators) Act 2006 is the legislation in Western Australia that protects children under the age of 16, or that the offender believes is under the age of 16, from an adult who uses electronic communications with the intent to procure the child to engage in sexual activity; or to expose the child to any indecent matter. Evidence of cyber predator behaviours will be reported to the Office of the Children's e-safety Commissioner (esafety.gov.au).

Cyberbullying and Illegal, Inappropriate or Offensive Online Content

If you are experiencing cyberbullying, you can report it to the eSafety Commissioner. This reporting system is also for flagging illegal, inappropriate or offensive online content. The eSafety Commissioner can assist with victim recovery and remove intimate images from social media. This site also has lots of helpful resources for young people, educators and parents.

<https://www.esafety.gov.au/>

Online Child Sexual Exploitation

Australian Centre to Counter Child Exploitation (ACCCE) is a collaboration of law enforcement and government agencies and organisations with the aim to prevent online child sexual exploitation. Online child sexual exploitation includes a wide range of behaviours and situations. Most commonly this includes grooming, live streaming, consuming child sexual abuse material, and coercing and blackmailing children for sexual purposes. Online child sexual exploitation is often thought of as adults abusing children, however, research indicates that more and more child exploitation material is being shared via social media, and is being produced by children themselves. This is sometimes called self-generated sexual content and often takes the form of 'sexting' which is requesting, capturing and sharing of explicit material. ACCCE can assist with any concerns or reports related to online child sexual exploitation.

<http://www.accce.gov.au/>

Breaches of the Policy or Code of Conduct

Any breaches of the Child Protection Policy, or the Code of Conduct or other findings of misconduct, will result in action being taken. This may include:

- meeting to discuss breach
- written warning
- further education and training
- suspension pending investigation outcome
- termination of employment
- referral to DCPFS and/or the Police.

Appendices

Appendix A: Child Safe Statement of Commitment



Child Safe Statement of Commitment

In accordance with the National Principles for Child Safe Organisations, West Coast Steiner School is committed to providing a child-safe environment which safeguards all students and is committed to promoting practices which provide for the safety, wellbeing and welfare of our children.

The Child Safe Statement of Commitment serves to protect students, reduce any opportunities for abuse or harm to occur, and promote child safety in the West Coast Steiner School environment. It is intended to complement child protection legislation, school policies and is an adjunct to the School's *Code of Conduct for Staff* and *Code of Conduct for Parents* and forms part of the contract between the School, and any visitors, volunteers or contractors. (See *Visitors and Volunteers Policy* and *Contractor Management Policy*).

All adults (18 years and over) who are visiting West Coast Steiner School or who working with or supervising children at the School or on school related activities off campus, are expected to support honour our Child Safe Statement of Commitment. This includes all visitors, employees, Council members, practicum students, parents, volunteers and contractors of West Coast Steiner School.

West Coast Steiner School explicitly forbids the use of any form of child abuse, corporal punishment or other degrading punishment, as defined in our *Child Protection Policy*.

YOU ARE EXPECTED TO:

- Be a positive role model to students.
- Promote the safety, welfare, and wellbeing of students.
- Be vigilant and proactive regarding student safety and child protection issues.
- Provide age-appropriate supervision for students.
- Act in accordance with the School's child protection and safety policies at all times.
- Consider and respect the diverse backgrounds and needs of children.
- Help create an environment that promotes and enables children's participation and is welcoming, culturally safe and inclusive for all children and their families.
- Use positive and affirming language towards students.
- Encourage students to 'have a say' and participate, and then listen to them with respect
- Respect cultural, religious, and political differences.
- Help provide an open, safe, and supportive environment for all students to interact, and socialise.
- Comply with Privacy laws and the School's policies and procedures on privacy, confidentiality, information sharing and record keeping.

Appendix B: Recognising Signs of Child Abuse

The following list of indicators is not exhaustive but contains those that will be of most use in recognising whether a child is being abused, neglected or at risk of harm. Referenced from AISWA guidelines which refers to, 'Identifying and responding to child abuse and neglect – A Guide for Professionals'.

Children frequently show indicators from more than one category and indicators should be considered in the context of the child's age, medical history, developmental history, and capabilities. In addition, mental illness, substance abuse and domestic violence within families must also be considered.

The single most helpful item for staff to consider is the deviation from normal or baseline behaviour of a child. A child who has been abused experiences mixed emotional and physical responses to abuse and may well be confused by the disconnect between respect/love for the abuser and abhorrence or ambivalence to the abuse itself.

Possible Indicators of Sexual Abuse

- sexualised behaviours inappropriate to their age (including sexually touching other children and themselves);
- knowledge of sexual behaviour inappropriate to their years;
- disclosure of abuse either directly or indirectly through drawings, play or writing that describes abuse;
- pain or bleeding in the anal or genital area with redness or swelling;
- fear of being alone with a particular person;
- a child or young person implying that he/she is required to keep secrets;
- the presence of sexually transmitted disease;
- sudden unexplained fears;
- bed-wetting and/or bed soiling.

Students with disability and sexual abuse

Research indicates that children with intellectual disabilities who have been sexually abused may exhibit behavioural issues, including emotional outbursts, self-harm, and heightened aggression (Commonwealth of Australia, 2017).

It is important to look for changes in behaviour that are out of character, for example:

- an increase in being abusive
- hitting self
- head banging
- angry and violent outbursts
- exhibiting sexual behaviour
- aggressive behaviour, and/or
- alternatively, being more withdrawn.

Possible Indicators of Physical Abuse

- broken bones or unexplained bruises, burns, or welts in various stages of healing;
- the child or young person is unable to explain an injury, or explanations given are inconsistent, vague or bizarre;
- direct admissions from the parents that they are concerned that they might harm their child;
- a history of family violence;
- marked delay between injury and obtaining medical assistance; a parent who shows little concern about the welfare of their child or the treatment and care of the injury;
- repeated presentations of the child to health services with injuries, ingestions or minor complaints (this could also be an indicator of Factitious Disorder by proxy, a rare expression of physical and emotional abuse);
- the child or young person is unusually frightened of a parent or carer, or is afraid to go home; the child or young person reports intentional injury by their parent or carer;
- arms and legs are kept covered by inappropriate clothing in warm conditions;

- ingestion of poisonous substances including alcohol or drugs;
- the avoidance of physical contact by the child (particularly with a parent or carer).

Possible Indicators of Emotional or Psychological Abuse

- the parent or carer constantly criticises, threatens, belittles, insults, or rejects the child or young person with no evidence of love, support, or guidance;
- the child or young person exhibits extremes in behaviour from overly aggressive to overly passive;
- delayed physical, emotional, or intellectual development;
- compulsive lying and stealing;
- high levels of anxiety;
- lack of trust in people;
- feelings of worthlessness about life and themselves;
- eating hungrily or hardly at all;
- uncharacteristic seeking of attention or affection;
- reluctance to go home;
- rocking, sucking thumbs or self-harming behaviour;
- fearfulness when approached by a person known to them.

Possible Indicators of Neglect

- signs of malnutrition, begging, stealing or hoarding food;
- poor hygiene: matted hair, dirty skin or severe body odour;
- unattended physical or medical problems;
- the child or young person states that no one is home to provide care (inadequate supervision, failure to ensure safety);
- child or young person appears constantly tired;
- frequent lateness to school or absence from school;
- inappropriate clothing, especially inadequate clothing in winter;
- alcohol and/or drug abuse present in the household;
- frequent illness, low grade infections or sores;
- hunger.

Appendix C: The Roles of the Department of Communities Child Protection and Family Support and WA Police

The Department of Communities Child Protection and Family Support (DCCPFS) is the government department with the statutory authority to investigate child protection concerns in Western Australia.

It is not the school's role to investigate child maltreatment issues, including concerns of sexual abuse. That responsibility lies with the DCCPFS and WA Police. All disclosures or strong concerns of abuse or neglect should be reported to DCCPFS by the Principal or teacher. DCCPFS will then decide on how to proceed.

The Western Australian Police also have a role in responding to allegations of child abuse and neglect. The WA Police Service Child Abuse Investigation Unit (CAIT) intervene in instances where it is believed that a criminal offence has occurred which may lead to criminal charges being laid. In the case of a report of child sexual abuse, DCCPFS will forward all reports to the WA Police.

Where abuse and neglect has occurred within a family and there is the possibility of criminal charges being laid, the police and the DCCPFS may undertake a joint investigation to reduce the trauma of the interviewing process to the child or young person.

The Principal's initial contact with the DCCPFS will be through the Duty Officer at the Local District Office closest to where the child lives. All calls from school concerning students are taken very seriously and it may be appropriate if the emergency occurs after hours to explain to the switchboard operator that it is an emergency so they can speak to the Duty Officer promptly. When reporting to the Duty Officer, note his/her name and position.

Note: The Mandatory Reporting Service and the Duty Officer at the local DCCPFS office can also be used initially in a consultative role if either the Principal or the teacher is unsure of what action to take.

The school should be aware that the powers of the DCCPFS, under the Children and Community Services Act 2004, includes the **apprehension of children in need of care and protection (without warrant)**.

DCCPFS has the authority to interview the child at school before contact is made with the parent/caregiver. Before doing so, the principal or 'person in charge' at the school must be notified. The child should have the option of having support at the interview from a staff member of their choosing.

DCCPFS officers may remove a child from the school if they have the permission of the parent/caregiver or if they have apprehended the child. The Principal should be satisfied that all conditions have been met before this occurs and document all conversations.

DCCPFS may require that a medical examination occur as soon as possible so that bruising, marking and other symptoms can be recorded for future reference. This would normally take place at either PMH or the Community Child Health Services Centres. This examination can only take place if permission has been obtained from the parent/caregiver or the child has been apprehended (when parent/carer permission is not obtained).

To avoid interfering with any investigative process initiated by DCCPFS or the Police, the Principal and teacher must seek advice from DCCPFS or Police prior to informing the parent/carer of a concern of abuse or neglect.

Appendix D: Responding to a Disclosure of Abuse or Neglect

If a student makes a disclosure of abuse or neglect staff should be aware of the immediate needs of the student and know what to do in these circumstances.

- Use 'protective interrupting' if students begin to disclose in class or in a public area to protect them from sharing the information with too many other people
- Acknowledge that you have heard them and stop them from disclosing any further
- Be supportive and gently indicate that they might tell you about it in a more private situation
- Quietly arrange to see them as soon as possible, in a situation away from other students
- Establish clear limits on confidentiality by telling the child that a report will be made to a person who will be able to provide help and protection and that you will help them throughout the process
- Put your own feelings aside and listen as if the information is not sensational
- Provide reassurance that the student is believed, that they were right to tell and it was not their fault
- Remain as objective as possible as a staff member and do not make judgements about what has happened
- Listen to students in an appropriate private location within the school, that is a place where the interactions can be observed but not heard by others
- Be empathetic to student feelings; the student may be confused because of the relationship with the abuser;
- Acknowledge that it is difficult to talk about such things
- Try to identify students' immediate fears
- Let students tell the event in their own words;
- If you are unable to answer all the questions of the child, it is OK to let them know
- Once you have established that they have been harmed or are at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure
- Allow students the option of support during any agency interview and reassure them of the availability of continuing support
- Document the conversation that you have had remembering as accurately as you can, the words and phrases used by the child to describe what has happened to them
- Document the disclosure and subsequent discussion and actions
- Explain what will happen next
- Try and stay with the student after the disclosure to provide a sense of security until necessary steps have been taken to ensure the safety and support.

Staff must be careful that they **DO NOT**:

- push for details or conduct an investigation. Other agencies have this responsibility;
- express judgement of the student, perpetrator or family;
- get angry, upset or show shock or give excessive pity
- ask questions that may make the child feel guilty or inadequate;
- ask leading questions, for instance 'Did Daddy hit you?';
- put words in students' mouths or interrogate as this could jeopardise any DCCPFS/Police investigation;
- promise not to tell when there are clear limits on confidentiality or make false promises;
- give a lecture about right and wrong;
- say 'forget it', 'you'll get over it' or other such minimising statements;

Appendix E: 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 and 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 or via cyber media.

In the early stage, a committed offender will employ grooming behaviour and because it is so subtle and gradual the child may not be aware of the actual abuse when it occurs and that it is wrong or harmful. The grooming occurs not only with the child but also with those supporting networks around the child which might 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 and as a result the child becomes increasingly dependent on the groomer and increasingly alienated from protective elements including possible sources to disclose to. Plausible deniability is part of the strategy that the groomer employs to ensure that staff do not take seriously the possible disclosures of a child. This is a deliberate strategy employed to maintain the secrecy of the abuse, so that the abuse is concealed and to ensure the silence of the child.

The groomer will exploit vulnerabilities of the protective elements around the child, including parents and family circumstances, organisational and systemic weaknesses. Groomers are very adept at identifying anomalies, boundary ambiguities, lack of systemic awareness; at deflecting attention from their own actions and intentions.

While distinguishing between appropriate intent and inappropriate intent is very difficult, particularly for a child, it is essential that schools have very clear expectations and boundaries around behaviours so that there can be rigorous accountability when dealing with children.

Organisations must invest in increasing understanding around providing a safe environment for children and adults to challenge existing practice, to be able to raise concerns around unprofessional behaviour and to have a shared understanding of what a safe school is.

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

- selecting, befriending a child and gaining his or her trust, exploiting the child's vulnerabilities;
- testing child's boundaries by telling inappropriate jokes, roughhousing, backrubs, tickling, 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 desensitized 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;
- recognizing 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; and
- positively represents child to others so as to be perceived as someone who would never harm the child.