



**KINGDOM CULTURE
CHRISTIAN SCHOOL**

CHILD PROTECTION PROCEDURES

March, 2026

Safe and supportive environment

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Child Protection Procedure – Overview

At Kingdom Culture Christian School (KCCS), we are committed to raising tomorrow's leaders by protecting and valuing every student as a child made in the image of God. Each student has inherent worth and must be kept safe from harm, abuse, and mistreatment.

These procedures outline the practical steps staff, volunteers, and other workers must follow to uphold child protection standards and meet our legal and spiritual responsibilities under New South Wales legislation, including:

- *Child Protection (Working with Children) Act 2012*
- *Children and Young Persons (Care and Protection) Act 1998*
- *Children's Guardian Act 2019*
- *Crimes Act 1900*

Purpose and Scope

These procedures provide clear guidance for the care, safety, and protection of students in all school-related activities. They apply to all KCCS workers - employees, volunteers, ministers, and contractors.

All workers are expected to fulfil their obligations, including holding a valid Working with Children Check where applicable and responding promptly to concerns.

These procedures are to be read in conjunction with the KCCS Child Protection Policy, which outlines the broader principles and responsibilities guiding our child safety practices.

Guidance for Child Protection Practice

The following procedures support all staff and volunteers to act confidently and lawfully in child protection matters. These are the five core operational parts of KCCS child protection practice.

Part 1 – Working With Children Check (WWCC) Clearances

Part 2 – Mandatory Reporting of Risk of Significant Harm (ROSH)

Part 3 – Reportable Conduct

Part 4 – Informing Staff Annually

Part 5 – Stakeholder Complaints About Staff Conduct

Related Procedures and Supporting Documents

These procedures operate alongside:

- KCCS Child Protection Policy
- Child Protection Code of Conduct
- Discipline and Behaviour Management Policy
- Guidelines for Protecting Children and Young People
- Critical Incidents Procedures
- Pastoral Care and Behaviour Support Framework
- Risk Management Procedures (Excursions, Playground Supervision, Emergency Events)

Working With Children Check (WWCC) Clearances

1. Purpose

To ensure all relevant staff and volunteers hold a valid Working With Children Check (WWCC) clearance in compliance with NSW legal requirements, and that all records are accurately verified, monitored, and securely maintained.

2. Who Requires a WWCC

A valid WWCC clearance is required for:

- All teaching staff (permanent, temporary, casual)
- All non-teaching staff who work directly with students
- Contractors engaged in child-related work
- Regular volunteers involved in student activities

Volunteer Exemptions:

A WWCC may not be required where a volunteer:

- Is a parent or close relative of a student and volunteers occasionally, and
- Is not engaged in a formal or ongoing child-related role

The school will assess each volunteer role to determine whether a WWCC is required.

3. Initial WWCC Verification Process

Responsibility:

The Office Manager is responsible for verifying all WWCC clearances.

Process:

- Prior to commencement, all staff and relevant volunteers must provide:
 - Their WWCC number
 - Full name and date of birth
- The Office Manager verifies the clearance via the NSW Office of the Children's Guardian (OCG) online portal.

Timing:

- Verification must occur **before the individual commences any child-related work.**

Record Keeping:

- A record of the verification must be maintained, including:
 - Full name of individual
 - WWCC number
 - Verification date
 - Clearance status
 - Expiry date

Storage:

- Records are maintained in:
 - A secure WWCC Register

Security and Confidentiality:

- All WWCC records are stored securely with restricted access.
- Information is handled in accordance with privacy legislation.

4. Non-Cleared Outcomes

If a WWCC result is not “cleared” (e.g. barred, interim bar, or not found):

- The individual **must not commence or continue** in child-related work.
- The Principal is notified immediately.
- Employment or engagement will be suspended or terminated in accordance with legal requirements.
- Appropriate documentation of the outcome and actions taken will be recorded.

5. Monitoring Ongoing Currency of WWCC

Responsibility:

The Office Manager is responsible for ongoing monitoring.

Process:

- A WWCC Register is maintained with all expiry dates recorded.
- The register is reviewed at first week during term breaks

Alerts:

- Staff are notified:
 - 3 months prior to expiry
 - 1 month prior to expiry
 - 1 week prior to expiry (final reminder)

Notifications are issued via email.

6. Renewal and Re-Verification

- Staff must renew their WWCC before the expiry date.
- Upon renewal, the Office Manager:
 - Verifies the new clearance via the OCG portal
 - Records the new verification date and updated expiry date

Important:

- Each verification (initial and subsequent) must be recorded separately.
- Previous verification records must not be overwritten.

7. Failure to Renew WWCC

If a staff member does not renew their WWCC:

- They will be immediately removed from child-related duties.
- Continued non-compliance may result in suspension or termination of employment.
- The Principal will be notified and appropriate action taken.

8. Record Keeping Requirements

The school will maintain:

- A WWCC Register including all staff and relevant volunteers
- Records of:
 - Initial verification
 - All subsequent verifications
 - Expiry dates and renewal actions
- Documentation of any non-compliance or adverse findings

All records are retained in accordance with legal and regulatory requirements.

Mandatory Reporting of Risk of Significant Harm (ROSH) Procedure

1. Purpose

To ensure all staff understand their legal obligation to identify and report concerns where a child or young person may be at Risk of Significant Harm (ROSH), in accordance with NSW legislation.

2. Use of AISNSW Child Protection Policy

The school adopts the AISNSW Child Protection Policy.

All staff must refer to the relevant sections of the AISNSW Child Protection Policy for detailed guidance regarding:

- Definitions of abuse and neglect
- Legal responsibilities of mandatory reporters
- Use of the Mandatory Reporter Guide (MRG)
- Reporting procedures and thresholds

This procedure should be read alongside that policy.

3. Definition of a Mandatory Reporter

A **mandatory reporter** is a person who, in the course of their professional work, delivers:

- Education
- Children's services
- Health care
- Welfare services

At this school, mandatory reporters include:

- All teaching staff
- The Principal
- School counsellors
- Any staff member engaged in child-related work who meets legislative requirements

4. What Must Be Reported

A report must be made when there are **reasonable grounds to suspect** that a child or young person is at risk of significant harm due to:

- Physical abuse
- Sexual abuse
- Emotional or psychological harm
- Neglect
- Exposure to domestic violence

5. When a Report Must Be Made

A report must be made:

- **As soon as practicable** after forming a reasonable suspicion
- When concerns arise through:
 - Disclosure by a student
 - Observations of behaviour or injuries
 - Information provided by a third party

Staff must not delay reporting to investigate further.

6. Internal Reporting Process

Step 1: Staff Responsibility

- The staff member must document their concern clearly and factually.
- The concern must be reported **immediately to the Principal**.

Step 2: Principal's Responsibility

Upon receiving a report, the Principal will:

- Review the information provided
- Consult the **Mandatory Reporter Guide (MRG)** via the NSW ChildStory Reporter website
- Determine whether the threshold for ROSH is met

7. Reporting to the Department of Communities and Justice (DCJ)

If the concern meets the ROSH threshold:

- The Principal (or delegated senior staff member) will:
 - Make a report to the Department of Communities and Justice (DCJ) using the ChildStory Reporter system
 - Record the **reference number** provided

If the threshold is not met:

- The matter may be recorded as a **wellbeing concern**
- Appropriate support and monitoring strategies will be implemented within the school

8. Record Keeping

Responsibility:

The Principal and/or Office Manager are responsible for maintaining records.

Records to be kept include:

- Staff report (written account of concern)
- MRG outcome
- Details of report made to DCJ (including reference number)
- Any follow-up actions or communications

Storage:

- Records are stored:
 - In a secure digital system or locked filing system
 - Separately from general student files where appropriate

Security and Confidentiality:

- Access is strictly limited to authorised personnel (Principal and delegated staff only)
- All information is handled in accordance with privacy and child protection legislation
- Information is shared strictly on a **need-to-know basis**

9. Principal's Actions Following a Report

After a report is made, the Principal will:

- Ensure all documentation is complete and securely stored
- Maintain confidentiality of all parties involved
- Follow any directions provided by DCJ or other relevant authorities
- Ensure the student is supported appropriately within the school
- Monitor the situation as required

10. Staff Responsibilities

All staff must:

- Remain vigilant to signs of abuse or neglect
- Act promptly on any concerns
- Follow the school's reporting procedures
- Maintain confidentiality at all times
- Not investigate beyond their role or question the child unnecessarily

11. Key Principle

The safety, wellbeing, and protection of the child is the school's highest priority. Where there is any doubt, staff are encouraged to **err on the side of reporting**.

Reportable Conduct Procedure

1. Purpose

To ensure the school meets its legal obligations to prevent, identify, report, and investigate allegations of reportable conduct, and to report findings in accordance with NSW requirements.

2. Use of AISNSW Child Protection Policy

The school adopts the AISNSW Child Protection Policy.

All staff must refer to the relevant section of the AISNSW Child Protection Policy for detailed definitions, processes, and legislative requirements relating to reportable conduct.

This procedure provides a clear framework for how these responsibilities are enacted within the school.

3. Key Roles and Responsibilities

Head of Entity:

The **Principal** is the Head of Entity for the purposes of reportable conduct.

Responsible for Notification:

- The Principal is responsible for notifying the relevant authorities of reportable allegations.

Responsible for Investigation:

- The Principal oversees all investigations.
- Where appropriate, an **external investigator** may be engaged to ensure impartiality and procedural fairness.

If the allegation relates to the Principal:

- The matter must be reported directly to the school's governing body (e.g. Board/Director).
- The governing body assumes the role of Head of Entity and is responsible for notification and investigation.

4. Definition of Reportable Conduct

Reportable conduct includes any conduct by an employee towards a child that involves:

- A sexual offence
- Sexual misconduct
- Ill-treatment of a child
- Neglect of a child
- An assault against a child
- An offence under relevant child protection legislation
- Behaviour that causes significant emotional or psychological harm to a child

Reportable conduct also includes misconduct that may not constitute a criminal offence but is inappropriate and places a child at risk.

5. Reporting Process

Internal Reporting:

- Any staff member who becomes aware of an allegation must:
 - Report the matter **immediately to the Principal**
 - Provide a clear, factual written account

Timeframes:

- The Principal (Head of Entity) must:
 - Notify the Children's Guardian of the allegation **within 7 business days**
 - Provide an **interim or final report within 30 calendar days**

6. External Reporting Requirements

The Principal will determine whether the matter must also be reported to:

- **NSW Police** – where there is a possible criminal offence
- **Department of Communities and Justice (DCJ)** – where there is a risk of significant harm
- **NESA** – where teacher accreditation matters are involved

Reports are made promptly in accordance with legal requirements.

7. Investigation Process

Approach:

- All allegations will be assessed and investigated promptly, fairly, and confidentially.
- The school may:
 - Conduct an internal investigation, or
 - Engage an external investigator for independence and expertise

Key Principles:

- Procedural fairness for all parties
- Protection of the child at all times
- Confidential handling of information

Steps may include:

- Preliminary assessment of the allegation
- Risk assessment and immediate protective actions
- Formal investigation process (interviews, evidence gathering)
- Findings made on the balance of probabilities

8. Record Keeping and Confidentiality

Responsibility:

The Principal and/or delegated senior staff member.

Records to be kept include:

- Initial allegation report

- Notifications to authorities
- Investigation notes and evidence
- Findings and final reports
- Correspondence with relevant agencies

Storage:

- Records are maintained:
 - In a secure, restricted-access digital system and/or locked filing system
 - Separately from general staff or student files where appropriate

Confidentiality:

- Information is shared strictly on a **need-to-know basis**
- All records are handled in accordance with privacy and legal requirements

9. Outcomes and Reporting Findings

At the conclusion of the investigation:

- A finding is made (e.g. sustained, not sustained, false, not reportable conduct)
- The outcome is reported to the Children’s Guardian
- Appropriate action is taken, which may include:
 - Disciplinary action
 - Termination of employment
 - Additional training or supervision

10. Staff Responsibilities

All staff must:

- Understand what constitutes reportable conduct
- Report any concerns immediately
- Maintain strict confidentiality
- Cooperate fully with any investigation process

11. Key Principle

The protection and wellbeing of students is paramount. All allegations are treated seriously and responded to with integrity, care, and diligence.

Informing Staff Annually – Child Protection Procedure

1. Purpose

To ensure all staff are regularly informed of their legal obligations and the school's expectations regarding child protection, and that clear records are maintained to demonstrate compliance.

2. Frequency of Informing Staff

- All staff must be informed of child protection requirements **at least once every 12 months**.
- This will occur:
 - At the **commencement of each school year**, and
 - As part of **ongoing professional development** where required

New staff must complete this process **prior to commencing duties**.

3. Content to Be Covered

Annual staff informing must include:

a. Legal Obligations

- Overview of child protection legislation in NSW
- Definition and responsibilities of **mandatory reporters**
- Legal consequences of failing to report

b. Risk of Significant Harm (ROSH)

- Indicators of abuse and neglect
- Staff obligations to report concerns
- The school's internal procedures for reporting
- Use of the Mandatory Reporter Guide (MRG)

c. Reportable Conduct

- Definition of reportable conduct
- Staff responsibilities in identifying and reporting allegations
- The school's procedures for managing allegations

d. School Expectations

- Staff Code of Conduct
- Professional boundaries
- Appropriate and inappropriate behaviour when working with students

e. Policies and Procedures

- Overview of all relevant child protection policies and procedures
- Staff responsibilities for compliance

4. Methods of Informing Staff

Staff may be informed through a combination of:

- Whole-staff **professional learning sessions**
- Internal briefings led by the Principal or delegated staff
- External training (online or face-to-face)
- Distribution of policy documents for reading
- Staff acknowledgment and sign-off processes

All staff are required to:

- Actively participate in training
- Read all required documentation
- Sign an acknowledgment confirming understanding and compliance

5. Records of Informing Staff

Responsibility:

The Principal and Office Manager are responsible for maintaining records.

Records to be kept include:

- Copies of training materials and presentations
- Attendance records (sign-on sheets)
- Certificates or proof of completion for external training
- Signed acknowledgements of policies and procedures
- A central **Register of Annual Staff Informing**, including:
 - Staff names
 - Date(s) of completion
 - Method(s) of informing

Storage:

- Records are stored securely:
 - In a restricted-access digital system and/or locked filing system
- Access is limited to authorised personnel only

6. Variations for Different Staff Groups

Teaching Staff:

- Must complete full annual training and all required components

Casual Staff:

- Must be informed prior to engagement and complete a streamlined induction process
- Must acknowledge key policies before commencing work

Volunteers:

- Must be informed of relevant child protection expectations appropriate to their role
- May complete a simplified induction and acknowledgment

Contractors and External Providers:

- Must be provided with the school's Code of Conduct and key child protection requirements
- Must acknowledge compliance where engaged in child-related work

7. Monitoring and Compliance

Responsibility:

The Office Manager monitors completion, under the direction of the Principal.

Process:

- A register is maintained and reviewed regularly to track completion
- Staff who have not completed requirements are identified promptly

Follow-Up:

- Staff will receive:
 - An initial reminder
 - A follow-up reminder if not completed within a specified timeframe
- Catch-up sessions or alternative training arrangements will be provided where necessary

Records of Follow-Up:

- Email reminders
- Notes of follow-up conversations
- Evidence of completed catch-up sessions

8. Non-Compliance

If a staff member does not complete the required informing:

- They may be **removed from duties involving students** until completion
- Ongoing non-compliance may result in:
 - Formal performance management
 - Disciplinary action

9. Key Principle

Ensuring all staff are well-informed is essential to maintaining a safe and supportive environment for all students. This process reflects the school's commitment to diligence, accountability, and the protection of every child in our care.

Stakeholder Complaints About Staff Conduct Procedure

1. Purpose

To provide a clear, transparent process for stakeholders to raise complaints about staff conduct, and to ensure all complaints are managed fairly, promptly, and in accordance with legal and regulatory requirements.

This information is made publicly available to support openness and accountability.

2. Use of AISNSW Complaints and Child Protection Policies

The school adopts the AISNSW Sample Complaints Handling Policy and Procedures.

- Complaints or allegations about staff misconduct will follow the procedures outlined in the school's **Complaints Handling Policy and Procedures**.
- Complaints or allegations that meet the definition of **reportable conduct** will be managed in accordance with the school's **Child Protection Policy and Procedures**.

3. Raising a Complaint

Who to Address the Complaint To:

- Complaints regarding staff conduct should be directed to the **Principal**.

How to Make a Complaint:

- Complaints should be made in writing and may be submitted via:
 - Email to the school's official email address, or
 - A written letter addressed to the Principal

Where necessary, the school may assist a complainant to document their concern.

Complaints About the Principal:

- If the complaint relates to the Principal, it must be directed to the **Chair of the School Board** (or governing body).

Nature of Complaints:

- Complaints may relate to **current or historical matters**, including allegations of reportable conduct.

4. Record Keeping (Complaints)

Responsibility:

The Principal and/or delegated senior staff member.

Records include:

- The original complaint
- Correspondence with the complainant
- Notes from any meetings or discussions

- Actions taken and outcomes

Storage:

- Records are stored securely:
 - In a restricted-access digital system and/or locked filing system
- Records are handled in accordance with privacy and confidentiality requirements

5. School Response to Complaints

Acknowledgement:

- The school will acknowledge receipt of a complaint **as soon as practicable**, typically within **5 working days**.

Assessment:

- The Principal will assess the complaint to determine:
 - The nature and seriousness of the allegation
 - Whether it constitutes misconduct or reportable conduct
 - The appropriate process to follow

6. Complaints Involving Reportable Conduct

Where a complaint involves alleged reportable conduct:

- The matter will be managed in accordance with the school's **Child Protection Policy and Procedures**
- The school has legal obligations to report such matters to the relevant authorities, including:
 - The Office of the Children's Guardian
 - NSW Police (where applicable)
 - Department of Communities and Justice (where applicable)

Important Considerations:

- Investigations may take time, particularly for complex or historical matters
- The school must comply with strict **privacy and confidentiality requirements**
- As a result, the school may be limited in the level of detail it can provide to the complainant regarding the progress or outcome

7. Investigation and Resolution

- Complaints will be handled in a manner that is:
 - Fair
 - Timely
 - Respectful of all parties
- The school may:
 - Conduct an internal review, or
 - Engage an external investigator where appropriate

8. Outcome and Communication

- Once the complaint has been finalised:
 - The complainant will be informed that the matter has been concluded
 - Where appropriate, a general summary of the outcome may be provided

Due to confidentiality obligations, specific details may not be disclosed.

9. Record Keeping (Outcome)

Responsibility:

The Principal and/or Office Manager.

Records include:

- Final determination and outcome
- Any actions taken
- Relevant communications

All records are:

- Stored securely
- Retained in accordance with legal requirements
- Accessible only to authorised personnel

10. Key Principle

The school is committed to handling all complaints with integrity, care, and diligence, ensuring that the wellbeing and safety of students remains the highest priority.

Information Sharing Regarding Student Safety

Under Chapter 16A of the *Children and Young Persons (Care and Protection) Act 1998 (NSW)*, KCCS, as a prescribed body, may exchange information with other prescribed bodies without the consent of the child or their family when:

- There is a reasonable belief that the information relates to the safety, welfare, or wellbeing of a child or young person, and
- No exemption under Chapter 16A applies.

Prescribed Bodies Include:

- NSW Police
- DCJ (formerly FACS)
- Government and non-government schools
- TAFE institutions
- Public and private health organisations
- Courts (Family Law and Federal Circuit)
- Commonwealth departments (Human Services, Immigration)
- Registered medical and allied health professionals
- Community housing providers
- Other organisations responsible for the care, welfare, or supervision of children

Exemptions to Disclosure

KCCS may withhold information if sharing it would:

- Compromise an investigation or legal process
- Breach legal professional privilege
- Endanger someone's safety
- Be against public interest

Restrictions on Use of Shared Information

Information may not be used or disclosed for purposes unrelated to the safety or wellbeing of a child or young person unless permitted by law.

Procedure for Handling Information Requests

- All information requests must be directed to the **Principal**.
- The Principal will assess the request for legal and practical validity.
- Requests must include:
 - Identity of the subject and their relationship to the child (if applicable)
 - Purpose of the request
 - Background and urgency
 - Whether the child or parent is aware of the request (and why not, if applicable)
 - Timeframe for the requested information
- A written record of the request, decision, and any information shared must be securely stored, **separate from the student's academic file**.

Procedure for Sharing Information Under Chapter 16A

Under Section 245C of the *Children and Young Persons (Care and Protection) Act 1998 (NSW)*, Kingdom Culture Christian School (KCCS), as a prescribed body, may share information with another prescribed body either voluntarily or in response to a formal request. This information sharing must relate to the safety, welfare, or wellbeing of a child, young person, or class of children and young persons.

1. Purpose of Sharing Information

Information may be shared if it will assist the recipient to:

- Make a decision, assessment, or plan;
- Facilitate an investigation;
- Provide a service related to the safety, welfare, or wellbeing of a child or young person (or a group); or
- Manage a risk to a child or young person in the recipient's role as an employer or agency.

2. Receiving a Request for Information

- All requests for information from a prescribed body must be directed to the **Principal**.
- Requests must include **sufficient detail** to justify the need for information. This includes:
 - The identity of the person the request concerns (and their relationship to the child, if not the child themselves)
 - A clear explanation of how the information will be used
 - Relevant background
 - Whether consent has been obtained from the child or family, and if not, why
 - The time period the information is being requested for
 - A reasonable timeframe for a response

3. Responding to a Request for Information

- The **Principal** will assess whether:
 - The request meets the criteria under Chapter 16A
 - The School holds the requested information
 - No legal exemptions to sharing apply (see Section 5 below)
- If the request meets requirements, the Principal may provide the information either **verbally or in writing**, acting in good faith.

4. Voluntary Sharing of Information

- If the Principal reasonably believes that sharing information with another prescribed body will assist in protecting a child or managing risk, they may initiate sharing even in the absence of a formal request.
- This may also occur without the consent of the child or their parents/caregivers, provided no exemption applies.

5. Exemptions from Sharing Information

KCCS may refuse to share information under Chapter 16A if doing so would:

- Prejudice a police or departmental investigation
- Breach legal professional privilege
- Reveal the identity of a confidential source

- Endanger any person's safety
- Contravene public interest considerations

6. Record Keeping

- A written record of every request for information and any information disclosed must be kept.
- These records are to be stored **securely and separately** from the student's general file.
- Documentation must include the date, the nature of the request, details shared, and the rationale for the decision made.

7. Legal Protection

- Any individual who shares information in good faith under Chapter 16A is **protected from civil, criminal, or disciplinary liability**.

Exemptions to Sharing Information

Under Chapter 16A sharing information provisions, KCCS does not have to provide any requested Information if it reasonably believes it would:

- prejudice the investigation of contravention of a law, or
- prejudice any care proceedings
- contravene any legal professional or client privilege, or
- enable the existence or identity of a confidential source of information in relation to the enforcement of a law to be ascertained
- endanger a person's life or physical safety, or
- not in the public interest

Making a Request for Information to a Prescribed body

The Principal will;

- try to first make contact by phone with the prescribed body to ensure the request is well targeted.
- If moving forward with the request, put in writing the following:
 - The person's identity, who is the subject of the request. If it is not the child/young person, state the relationship of the person to the child/young person.
 - An explanation of how the Information will assist KCCS to make decisions, plan, assess or facilitate an investigation or manage risk.
 - Sufficient detail to assist the prescribed body to understand the purpose and nature of the request.
 - The background to the request, including if child/young person/parents/caregivers have been informed of the request and if not why not.
 - An indication of the timeframe in which the Information is sought.(for example for the past year)
 - A realistic time period (a negotiated date) for the request to be processed.

Restriction for Use of Information

- Under Chapter 16A of the Children and Young Persons (Care and Protection) Act 1998 (NSW), KCCS must not use or disclose information for any purpose that is not directly related to the safety, welfare, or well-being of the child/young person or the class of children/young persons, except where such use or disclosure is expressly permitted by law.

Identifying Concerns About a Child or Young Person

All staff and volunteers have a duty to remain vigilant in identifying any concern that may relate to the safety, welfare, or wellbeing of a child or young person. The steps below outline how concerns are to be identified and recognised as part of our child-safe responsibilities.

1. Be Alert to Signs of Harm

Staff and volunteers must stay aware of any signs that may indicate a child is at risk of harm. This includes but is not limited to:

- Unexplained injuries or frequent bruising
- Changes in behaviour (withdrawal, aggression, fearfulness, anxiety)
- Ongoing hunger, poor hygiene, or neglect of basic needs
- Disclosure of abuse or concerning experiences
- Frequent absences without explanation
- Sexualised behaviour or language that is not age appropriate
- Significant emotional distress or self-harming behaviour

2. Respond Appropriately to a Disclosure

If a child discloses something concerning:

- Listen without judgment, interruption, or prompting
- Remain calm and supportive
- Do not ask leading questions or press for details
- Avoid making promises about what will happen next
- Reassure the child that they have done the right thing by speaking up
- Record the information as soon as possible in the child's own words

3. Observe and Document

Even if there is no direct disclosure, staff are to:

- Pay attention to patterns in behaviour, health, or appearance
- Make brief, objective notes of what is seen or heard
- Avoid speculation or assumptions
- Include dates, times, observations, and any actions taken

4. Seek Guidance if Unsure

If uncertain whether a concern meets the threshold for a report:

- Do not ignore it
- Speak with the **Principal** (or the Principal's delegate) for clarification
- Continue to monitor and document further observations if advised

5. Do Not Investigate

It is not the responsibility of staff or volunteers to investigate concerns. The role is to identify and report, not to determine guilt or innocence.

6. Report Promptly

Any concern that a child may be at risk of significant harm must be reported:

- To the **Principal** as soon as possible (same day)
- Where applicable, a report will be made to external authorities by the Principal.

Reporting Obligations and Procedure

At KCCS, we take every concern about a child's safety seriously. All staff and volunteers are responsible for acting promptly and appropriately when they become aware of, witness, or are told about a situation that may involve harm to a child.

1. Obligation to Report Internally

All staff and volunteers must report any child protection concern—whether it is a suspicion, disclosure, or direct observation—to the **Principal**, or if unavailable, the **Principal's delegate**, **as soon as practicable** on the same day the concern arises.

Reports may relate to:

- Physical, emotional, or sexual abuse
- Neglect or risk of harm
- Concerning behaviour by an adult, staff member, or volunteer
- Disclosures made by students, parents, or others

Note: It is not the staff member or volunteer's role to verify the concern. Your responsibility is to report what you know or have observed.

2. Providing a Written Account

The person reporting the concern must document the following:

- Date, time, and setting of the concern or disclosure
- Exact words spoken (if applicable)
- Observations (injuries, behaviour, statements)
- Any immediate response taken
- Name of the person to whom the concern was reported

This written account must be handed to the Principal or delegate and stored securely in the school's confidential child protection records.

3. Principal's Duty to Report Externally

The Principal will determine if the concern must be reported to external authorities. This includes:

- **NSW Department of Communities and Justice (DCJ)** if there is suspected risk of significant harm (ROSH) to a child. The **Mandatory Reporter Guide (MRG)** will be used to assist in decision-making.
- **NSW Police**, if there is suspicion of a criminal offence or immediate danger to the child.
- **Office of the Children's Guardian (OCG)** if the matter involves reportable conduct by an employee or volunteer.

The Principal will make the external report, document the process, and follow any direction given by the agency involved.

4. Confidentiality and Record Keeping

All information related to child safety concerns and reports will be:

- Treated with the highest level of confidentiality
- Shared only with those who have a legal or protective need to know
- Stored securely in the school's protected records system

5. Support and Ongoing Monitoring

Where appropriate:

- The child and their family may be offered pastoral or wellbeing support.
- The staff member or volunteer may receive debriefing or guidance.
- The school will continue to monitor the situation if no report is made at the time, or where ongoing concerns remain.

Responding to Allegations of Reportable Conduct

KCCS is committed to ensuring all allegations involving staff or volunteers are handled with integrity, care, and in accordance with legal requirements. The safety of the child is always the priority, and the person subject to an allegation will be treated fairly and respectfully throughout the process.

1. Definition of Reportable Conduct

Under the **Children's Guardian Act 2019 (NSW)**, reportable conduct includes:

- Sexual offences or misconduct against, with, or in the presence of a child
- Physical violence
- Behaviour causing significant emotional or psychological harm
- Neglect
- Any sexual relationship with a child under the employee's care

2. Immediate Safety and Initial Steps

As soon as an allegation is made:

- Steps will be taken to ensure the **immediate safety of any children** involved.
- The **Principal** (or their delegate) will be informed **immediately**.
- The Principal will assess whether the alleged behaviour poses an immediate risk to any child or the wider school community.

If needed, the staff member or volunteer may be **temporarily removed from duties**, or restricted in their role, while the matter is investigated. This is not a judgment of guilt but a precaution to protect all parties.

3. Reporting to the Office of the Children's Guardian (OCG)

The Principal, as the Head of Entity, is legally required to notify the OCG within **7 business days** of becoming aware of a reportable allegation.

This includes:

- The nature of the allegation
- The steps taken to protect children
- The plan for investigation

If the matter also involves a possible criminal offence, it will be reported to **NSW Police**.

4. Informing the Person Subject to the Allegation

The employee or volunteer who is the subject of an allegation will be:

- Informed of the allegation **in general terms** as soon as it is safe and appropriate to do so
- Advised of their rights, including the option to seek support or union representation
- Provided with an outline of the process, including investigation steps
- Given the opportunity to respond to the allegation during the investigation

Information about the child or reporting person will not be shared unless permitted or required by law.

5. Conducting the Investigation

The Principal will ensure the investigation is:

- **Thorough and impartial**, using internal or external investigators as needed
- **Fair to all parties**, allowing the person subject to the allegation to respond
- **Documented clearly**, with findings and reasons recorded

Support will be made available to both the person subject to the allegation and the student or family involved.

6. Final Decision and Outcome

After the investigation:

- A finding will be made based on the evidence: substantiated, not substantiated, or inconclusive
The OCG will be notified of the outcome
- Disciplinary action may be taken if the allegation is substantiated, up to and including termination
The person subject to the allegation will be informed of the outcome and any action taken
- All records will be kept securely and confidentially

7. Confidentiality and Pastoral Care

Throughout the process:

- Confidentiality will be maintained to protect all individuals
- Students and families involved will be offered care and support
- Staff or volunteers facing allegations will also be offered appropriate pastoral care

Reportable conduct does not extend to:

- conduct that is reasonable for the purposes of the discipline, management or care of children, having regard to the age, maturity, health or other characteristics of the children and to any relevant codes of conduct or professional standards
- the use of physical force that, in all the circumstances, is trivial or negligible, but only if the matter is to be investigated and the result of the investigation recorded under workplace employment procedures
- conduct of a class or kind exempted from being reportable conduct

NOTE: Examples of conduct that would not constitute reportable conduct include (without limitation) touching a child in order to attract a child's attention, to guide a child or comfort a distressed child; a School teacher raising his or her voice in order to attract attention or to restore order in the classroom; and conduct that is established to be accidental.

Conduct Exempted from Reporting

- Finding made that allegation related to physical assault:
 - Assault did not occur,
 - Inappropriate professional behaviour occurred, or
 - There is some evidence that inappropriate professional behaviour occurred but the allegation is not sustained because of insufficient evidence.

Inappropriate Professional Behaviour

'Teachers are required to manage students' behaviour and sometimes they use inappropriate professional behaviour. This may involve inappropriate physical contact with a child or the throwing of a light object at a child. Some force may have been used but it is not excessive given the age or size of the child relative to the teacher, nor has it caused physical harm. Such behaviour management does not meet professional standards but it is not reportable to the Commission. These matters are categorised as "inappropriate professional behaviour".

Record Keeping Procedure

KCCS recognises the importance of keeping accurate and secure records in all child protection matters. These records form part of our duty of care, support transparency and accountability, and assist in protecting children and staff.

1. Scope of Records

The following must be documented and stored securely:

- Disclosures or suspicions of abuse or harm
- Observations and concerns raised by staff, volunteers, students, or others
- Reports made to the Principal or external agencies
- Investigations and their findings
- Correspondence related to the matter (e.g. from DCJ, Police, or the OCG)
- Risk assessments or safety plans
- Decisions and actions taken by the school

2. Making and Managing Records

Records must be:

- **Factual and objective**, avoiding opinions unless clearly stated as such
- **Dated and signed** by the staff member making the record
- **Clear and detailed**, including times, names, and specific actions taken
- Made as soon as possible after the event, preferably on the same day

The Principal or delegate will review each record to ensure it meets legal and school standards.

3. Storage and Access

All child protection records are stored in a **secure and confidential system**, separate from general student or staff files. This includes:

- Digital files stored on a protected, access-restricted server
- Physical files stored in a locked cabinet, accessible only to the Principal and their delegate

Access is strictly limited to those with a legitimate and legal need to know, such as the Principal, relevant authorities, or governing body representatives.

4. Retention of Records

In line with legal requirements:

- Child protection records must be kept for a **minimum of 7 years**, or longer where necessary (e.g. until the child turns 25)
- Where the matter involves reportable conduct, the retention period may extend under the requirements of the Office of the Children's Guardian

Records must **not be destroyed** without written approval from the Principal, and only in accordance with official record retention guidelines.

5. Monitoring and Review

The Principal is responsible for ensuring that:

- All records are reviewed regularly for completeness and accuracy
- Record keeping procedures are followed by staff
- Any breach of confidentiality or mishandling of records is addressed promptly

THE CHILD PROTECTION CODE OF CONDUCT

1. INTRODUCTION & PURPOSE

This Child Protection Code of Conduct outlines KCCS's values, commitments and expectations in relation to child protection matters, and reflects its commitments to:

- Provide** An open, welcoming and safe environment for everyone participating in KCCS's education programs, pastoral services and related programs.
- Provide** High quality education, pastoral services and related programs for students and their families that are safe and welcoming for them and set in a Christian context.
- Seek** Input and guidance from students, parents, employees and others who make up the Staff, so these standards are maintained.
- Require** All Staff members are to demonstrate a commitment to the highest standards of ethics, professional behaviour and Christian standards in dealings with children and young people.
- Require** All Staff members share a common responsibility to maintain KCCS's reputation for integrity in relation to child protection matters.

2. SCOPE

This Child Protection Code of Conduct applies to all Staff members. Definitions in this Code of Conduct:

- (a) **Student** or **Students** refers to:
- A **Child** or **Children** which is defined in this Code as being a person under the age of 16 years
 - A **Young Person** or **Persons** which is defined in this Code as a person between the ages of 16 and 18 and
 - Any other student of KCCS over the age of 18 years.
- (b) **Staff members** refers to:
- All paid employees whether employed on a permanent, temporary or casual basis.
 - All persons who have been engaged to work within KCCS or who have face to face or online contact with students of KCCS in any place and on any basis, including persons holding a church ministry license or church-appointed position, consultants, students on tertiary practicum placements, or volunteers working with students in any capacity.
 - Students enrolled at KCCS.

3. MISSION & VALUES IN RELATION TO STUDENTS

'Raising Tomorrow's Leaders'

In fulfilling this mission, KCCS seeks to create a caring environment where Christian values inspire and affirm the highest standard of ethical conduct in relation to the care, support and welfare of students entrusted to it.

4. CODE OF CONDUCT

All Staff members, and all students, parents and visitors connected with KCCS, must keep to the Child Protection Code of conduct. The Child Protection Code of Conduct should be enacted with reference to "The KCCS Guidelines of Teaching and Protecting Children".

5. EXPECTATIONS OF Staff MEMBERS

All Staff members:

- Will** Treat everyone with respect and honesty.
- Will** Behave as a positive role model to students in all interactions with them.
- Will** Follow School policy and procedures for the safety of students as outlined in KCCS's Child Protection Policy and related materials.
- Will** When conducting any one-to-one activity with a student:
 - Ensure that another adult is present or within sight at all times during one-to-one activity
 - Ensure that this adult is actively engaged and aware of the action of the Staff member at all times during the one-to one activity
 - If the active engagement and awareness of another adult is not possible or practicable, ensure that prior approval for the one-to-one activity has been obtained from the Staff member's immediate supervisor.
- Will** Record and act on a complaint of abuse, ill-treatment or neglect of a student.
- Will** Behave in a caring, compassionate manner following the example left for us by Jesus Christ, as a person who takes an interest in the well-being of students and who sets appropriate boundaries in their interaction with students.
- Will** Respect the duty to take reasonable care for the safety and welfare of students.
- Will** Complete and maintain a current Working with Children Check with the Office of the Children's Guardian.
- Will** Inform KCCS if they are charged or convicted of an offence relevant to working in child-related employment, or if they have had any reportable allegation made against them.
- Will** Report to KCCS any allegations or convictions of Reportable Conduct involving any Staff member.
- Will** Report to KCCS any information or concerns about inappropriate behaviour by any Staff member that involves a student.
- Will** Fulfil their legal obligation to report risk of significant harm, or to report possible

criminal activity, in accordance with local procedures.

- Will** Maintain the confidentiality of all parties concerned
- Will Not** Develop any “special” or selective relationships with a student that could be seen as favouritism such as the offering of gifts or special treatment.
- Will Not** In the absence of the prior approval from the Staff member’s immediate supervisor, or without the active participation of another adult, engage in one-to-one contact with a student such as:
- Doing things of a personal nature that students can do for themselves, such as entering a toilet when a student is present or a student changing clothes
 - Accompanying a student alone in a vehicle
 - Visiting a student’s home in circumstances where the student is alone
 - Individual tutoring or mentoring a single student alone, one-on-one
 - Disciplining or counselling a single student alone, one-on-one
- Will Not** Engage in grooming behaviour of a student or their close family or friends.
- Will Not** Engage in inappropriate physical contact/force with a student including physical/corporal punishment of a student.
- Will Not** Act in ways which may cause a student to reasonably fear that unjustified force will be used against them, even if this is not their intention.
- Will Not** Behave in a manner which may cause psychological harm to the student.
- Will Not** Correct or discipline a student in excess of what is reasonable or appropriate for the situation.
- Will Not** Engage in crossing professional boundaries through behaviour that can reasonably be construed as involving an inappropriate and/or overly personal intimate relationship with, conduct towards, or focus on a student or a group of students.

6. FURTHER INFORMATION

Further reference should be made to KCCS’s Child Protection Policy. With acknowledgement to KCCS’s Code of Conduct

THE CHILD PROTECTION CODE OF CONDUCT ACKNOWLEDGEMENT

ACKNOWLEDGEMENT BY STAFF MEMBER / WORKER / VOLUNTEER

I, _____ [Insert Full Name], being employed or engaged by

Kingdom Culture Christian School (KCCS) in the role of _____ [Insert Position],

- Have received the above Child Protection Code of Conduct, and the Guidelines for Teaching & Protecting Children and Young People
- Have read the Child Protection Code of Conduct and Child Protection Policies and am obliged to comply with the Code and Policy, including any amendments made by KCCS from time to time
- Am obliged to notify KCCS if my Working With Children Check status changes from “Cleared”
- Am a Mandatory Reporter of concerns about children or young people being at risk of significant harm
- Am obliged to inform the Principal of suspicion of reportable conduct of another community member
- Have received training in aspects of the Child Protection Policies
- Am aware that a current copy of the Child Protection Code of Conduct and Child Protection Policy is available on *Google drive shared drive* and sent by email

Signature _____

Date _____

NB: This signed and completed form must be returned prior to commencement of employment or engagement with KCCS to the Principal. Failure to do so will not affect the applicability of this Child Protection Code of Conduct or any of its provisions.

INDICATORS OF RISK OF SIGNIFICANT HARM

Risk of Significant Harm Definition

A child or young person is at risk of significant harm if the circumstances that are causing concern for the safety, welfare or wellbeing are:

- Present to a significant extent
- Sufficiently serious to warrant a response by a statutory authority irrespective of a family's consent
- Not minor or trivial
- May reasonably be expected to produce a substantial and demonstrable adverse impact on their safety, welfare or wellbeing, (or in the case of an unborn child, after the child's birth)
- May be a single act or omission or an accumulation of these.

Forms of Child Abuse

There are different forms of child abuse. These include neglect, sexual, physical and emotional abuse.

Neglect

Child neglect is the failure or significant risk of failure by a parent or carer to provide a child with the basic things needed for his or her proper growth and development, such as food, clothing, shelter, medical and dental care, and adequate supervision to such an extent that it can reasonably be expected to produce a substantial and demonstrably adverse impact on the child/young person's safety, welfare or wellbeing. This includes lack of enrolment in and attendance at School. This lack of care can be by a single act or an ongoing series of acts or omissions.

Sexual Abuse

Sexual abuse is when someone involves a child or young person in sexual activity by using their power over them or taking advantage of their trust. Often children or young people are groomed, bribed, coerced or threatened physically and psychologically to make them participate in the activity. Sexual abuse also includes exposing the child/young person to situations or circumstances which place them at risk of sexually abused and/or exploited. Sexual abuse is a crime.

Physical Abuse

Physical abuse is a non-accidental injury or pattern of injuries to a child or young person caused by a parent, carer or any other person.

It includes but is not limited to injuries which are caused by excessive discipline, severe beatings or shakings, cigarette burns, attempted strangulation and female genital mutilation.

Injuries include bruising, lacerations or welts, burns, fractures or dislocation of joints.

Hitting a child or young person around the head or neck and/or using a stick, belt or other object to discipline or punish a child or young person (in a non-trivial way) is a crime.

Emotional Abuse or Psychological Harm

Serious psychological harm can occur where the behaviour of their parent or carer damages the confidence and self-esteem of the child or young person, resulting in serious emotional disturbance or psychological trauma.

Although it is possible for 'one-off' incidents to cause serious harm, in general it is the frequency, persistence and duration of the negative parental or carer behaviour that is instrumental in defining the consequences for the child or young person.

This can include a range of behaviours such as excessive criticism, withholding affection, exposure to a single severe incident of or ongoing domestic violence, intimidation or threatening behaviour.

Possible Signs of Abuse

There are common physical and behavioural signs that may indicate abuse or neglect. The presence of one of these signs does not necessarily mean abuse or neglect. Other things need to be considered, such as the circumstances of the child, young person or family.

When considering if a child or young person has been abused or neglected, or is at risk of this, it is important to keep in mind the life circumstances of the child, young person and their family.

The following risk factors (either singularly or in combination) are associated with increased risk of harm for children and young people:

- social or geographic isolation of the child, young person or family, including lack of access to extended family
- previous abuse or neglect of a brother or sister
- family history of violence including domestic violence
- physical or mental health issues for the parent or carer which affects their ability to care for the child or young person in their care
- the parent or carers' abuse of alcohol or other drugs which affects their ability to care for the child or young person in their care.

The signs below are only possible signs of abuse and neglect. The presence of these signs does not necessarily mean abuse and neglect has been occurring. The child or young person's circumstances and their age or other vulnerabilities, for example disability or chronic illness, also need to be taken into consideration. If you have concerns then you should report them to the Office of Children's Guardian.

Neglect

Signs in children or young people:

- low weight for age and/or failure to thrive and develop
- untreated physical problems eg sores, serious nappy rash and urine scalds, significant dental decay
- poor standards of hygiene ie child or young person consistently unwashed
- poor complexion and hair texture
- child not adequately supervised for their age
- scavenging or stealing food and focus on basic survival
- extended stays at School, public places, other homes
- longs for or indiscriminately seeks adult affection
- rocking, sucking, head-banging
- poor school attendance

Signs in parents or carers:

- unable or unwilling to provide adequate food, shelter, clothing, medical attention, safe home conditions
- leaving the child without appropriate supervision
- abandons the child or young person
- withholding physical contact or stimulation for prolonged periods
- unable or unwilling to provide psychological nurturing
- has limited understanding of the child or young person's needs
- has unrealistic expectations of the child or young person

Physical abuse

Possible signs in children or young people:

- bruising to face, head or neck, other bruising and marks which may show the shape of the object that caused it, for example, belt buckle, hand print
 - lacerations and welts
 - drowsiness, vomiting, fits or pooling of blood in the eyes, which may suggest head injury
 - adult bite marks and scratches
 - fractures of bones, especially in children under three years old
 - dislocations, sprains, twisting
 - burns and scalds (including cigarette burns)
 - multiple injuries or bruises
 - explanation of injury offered by the child or young person is not consistent with their injury
 - abdominal pain caused by ruptured internal organs, without a history of major trauma
 - swallowing of poisonous substances, alcohol or other harmful drugs
 - general indicators of female genital mutilation, for example, having a 'special operation'
- Possible signs in parents and carers:
- frequent visits with the child or young person in their care to health or other services with unexplained or suspicious injuries, swallowing of non-food substances or with internal complaints
 - explanation of injury offered by the parent is not consistent with the injury
 - family history of violence
 - history of their own maltreatment as a child
 - fears injuring the child or young person in their care
 - uses excessive discipline

Sexual abuse

Possible signs in children or young people:

- bruising or bleeding in the genital area
 - sexually transmitted diseases
 - bruising to breasts, buttocks, lower abdomen or thighs
 - child or young person or their friend telling you about it, directly or indirectly
 - describing sexual acts
 - sexual knowledge or behaviour inappropriate for the child's age
 - going to bed fully clothed
 - regressive behaviour eg sudden return to bed-wetting or soiling
 - self-destructive behaviour eg drug dependency, suicide attempts, self-mutilation
 - child being in contact with a known or suspected paedophile
 - anorexia or overeating
 - adolescent pregnancy
 - unexplained accumulation of money and gifts
 - persistent running away from home
 - risk taking behaviours - self harm, suicide attempts
- Possible signs in parents or carers:
- exposing a child or young person to prostitution or pornography or using a child for pornographic purposes
 - intentional exposure of a child to sexual behaviour of others
 - previous conviction or suspicion of child sexual abuse
 - coercing a child or young person to engage in sexual behaviour with other children
 - verbal threats of sexual abuse
 - denial of adolescent's pregnancy by family

Possible signs in parents or carers:

- constant criticism, belittling, teasing of a child or young person, or ignoring or withholding praise and attention
- excessive or unreasonable demands
- persistent hostility and severe verbal abuse, rejection and scapegoating
- belief that a particular child or young person in their care is bad or 'evil'
- using inappropriate physical or social isolation as punishment
- domestic violence.

Remember, the above are only possible signs of abuse and neglect. The presence of these signs does not necessarily mean abuse and neglect has been or is occurring.

Domestic or Family Violence

Domestic or family violence is behaviour toward a family member that may include:

- physical violence or threats of violence,
- verbal abuse, including threats,
- emotional or psychological abuse,
- sexual abuse,
- financial and social abuse.

Exposure to family violence constitutes a risk of significant harm under the Children and Young Person's (Care and Protection) Act 1998.

Possible signs - As family violence can include one or more forms of abuse (physical or sexual abuse, neglect, or emotional and psychological harm), their physical and behavioural indicators may be also signs of domestic violence.

Possible signs in older children and young people may include:

- moving away or running away from home,
- involvement in criminal activity,
- alcohol and substance abuse,
- violence in their own relationships.

Emotional abuse

All types of abuse and neglect harm children psychologically, but the term ‘psychological harm’ or ‘emotional abuse’ applies to behaviour which damages the confidence and self-esteem of a child or young person, resulting in serious emotional deprivation or trauma.

Possible signs in children or young people:

- constant feelings of worthlessness about life and themselves
- unable to value others
- lack of trust in people
- lack of people skills necessary for daily functioning
- extreme attention-seeking behaviour
- is obsessively eager to please or obey adults
- takes extreme risks, is markedly disruptive, bullying or aggressive
- is highly self-critical, depressed or anxious
- suicide threats or attempts
- persistent running away from home

Additional Vulnerabilities

- All children and young people are vulnerable to abuse and other harm because of their dependence upon adults. Being vulnerable does not mean that a child or young person will be abused although it does increase the risk.

This may include children and young people who:

- are Aboriginal and Torres Strait Islanders,
- have a disability,
- from culturally and linguistically diverse backgrounds. They may encounter circumstances that:
 - make it more likely that they will receive an inadequate response to abuse or other harm,
 - make it less likely that they will disclose abuse or other harm, than other children or young people.

A variety of factors may influence the vulnerability of a child or young person such including:

- the experience of previous maltreatment,
- the nature of a disability,
- the family characteristics and circumstances,
- involvement with an institution where they are at higher risk,
- other factors- physical characteristics, social isolation, high achievement and sexual orientation.

Grooming Behaviours

Identifying, Reporting and Addressing Grooming Behaviours

Grooming behaviours can be the precursor (in some cases) to abuse.

Legal Obligation:

Section 66EB - Procuring or Grooming a Child Under 16 for Unlawful Sexual Activity

- **Subsection (2) – Procurement for Unlawful Sexual Activity:**
 - **Offense Description:** An adult person who **intentionally procures** a child for unlawful sexual activity with themselves or any other person is guilty of an offense.
 - **Penalty:** Penalties may include a maximum of **12 years' imprisonment**.
- **Subsection (2A) – Meeting a Child Following Grooming:**
 - **Offense Description:** An adult person is guilty of an offense if:
 - They **intentionally meet** a child (or travel with the intention of meeting) whom the adult person has **groomed** for sexual purposes, and
 - They do so with the intention of **procuring** the child for unlawful sexual activity with either the adult or another person.
 - **Penalty:** The penalty for this offense is **12 years' imprisonment**.
- **Subsection (2B) – Definition of Grooming for Sexual Purposes:**
 - **Explanation:** For the purposes of **subsection (2A)**, a child is considered to have been **groomed for sexual purposes** if, on one or more previous occasions, the adult person has engaged in conduct that exposed the child to **indecent material**.
 - **Key Point:** The act of exposing a child to inappropriate material forms part of the grooming process.

Section 474.27 – Using a Carriage Service to "Groom" Persons Under 16 Years of Age

- **Offense Description:**
 - A person (the sender) commits an offense if:
 - (a) The sender uses a **carriage service** (such as the internet, phone, or other telecommunications) to **transmit a communication** to another person (the recipient).
 - (c) The sender does this with the **intention** of making it easier to **procure** the recipient to engage in **sexual activity** with the sender.
 - (d) The recipient is someone who is, or whom the sender believes to be, **under 16 years of age**.
 - (e) The sender is **at least 18 years of age**.
- **Penalty:**
 - The penalty for committing this offense under **Section 474.27** can be up to **12 years' imprisonment**.

Key Elements:

- **Carriage Service:** This refers to any telecommunications or internet service (such as phone calls, text messages, social media, email, etc.).
- **Grooming Intention:** The sender's intention must be to make it easier to **procure** the recipient (a person under 16) for sexual activity.
- **Age of the Sender:** The sender must be at least 18 years old.
- **Belief about the Recipient's Age:** The sender's belief that the recipient is under 16 years of age is sufficient, even if the recipient is not actually under 16, provided the sender has this belief.

Context and Application:

This law specifically addresses **online grooming** and **sexting**, where an adult uses digital or telecommunication methods to influence, manipulate, or "groom" a child for sexual exploitation. The legislation is crucial for protecting children from online predators, particularly in the context of increasing online interactions.

This law reflects a strong stance against online grooming and the use of technology to exploit children, with significant penalties attached to those who commit such offenses.

Grooming behaviour refers to the manipulative cultivation of relationships by an adult in order to develop or maintain a sexual relationship with a child (or children) or young person (or persons). Typically, the cultivation of relationships will be extended to gain the confidence of the child or young person who is the intended target of the behaviour, his or her family, and others around them including teachers and persons in support relationships such as church workers and volunteers, sports coaches and fellow students. It is not a single act of unprofessional or inappropriate behaviour, but a pattern of behaviour that seeks to gain the trust of the child as well as other people in the child's life such as parents and other teachers.

Grooming behaviour is indicated by any or all of the following elements:

- Persuading a child that they have a 'special' relationship, for example, by spending inappropriate special time alone with the child, inappropriately giving gifts, showing special favours to them but not other children, allowing the child to overstep rules.
- Testing of boundaries, for example, by undressing in front of the child, encouraging inappropriate physical contact (that is not overtly sexual), talking about sex, 'accidental' touching of genitals.
- Extending a relationship outside the employment situation. This should not be assumed to constitute grooming where an existing relationship pre-dates the employment or where the extended relationship arises through a reasonable level of social engagement in the relevant community (for example, sports coaching, family level social contact within a small community).
- Inappropriate personal correspondence, including electronic communication, that explores sexual feelings or intimate personal feelings.
- taking photographs, audio recording, or filming students via any medium without School authorisation based on parental consent.
- Inviting, allowing or encouraging students to attend a staff members house
- making inappropriate comments about a student's appearance or excessive flattery.

Where the above actions do not constitute grooming behaviour, they may be a violation of KCCS's Code of Conduct or constitute professional misconduct and need to be reported to the Principal.

Physical contact with students that does not constitute grooming behaviour is:

- . Assisting students who hurt themselves
- . Assisting students when they pose a physical threat to themselves or others
- . Delivery of first-aid
- . Non-intrusive gestures when a child is experiencing distress (such as a pat on the upper back)
- . Non-intrusive touching such as a handshake

NB: Refer to KCCS 'Guidelines for Teaching and Protecting Children and Young People', and KCCS Code of Conduct

Reporting Grooming

A school culture should provide a safe and supportive environment where Staff members feel confident to make a report about another Staff member. Reports should be made honestly and without recklessness.

- . If a staff member (or any other stakeholder) has a reasonable suspicion or belief that grooming behaviour is occurring, they must report it to the Principal (or delegate).
- . Grooming behaviour can place a child at risk of significant harm and must be reported as reportable conduct if the person subject to the allegation holds a Working With Children Check (WWCC). Consideration should also be given to reporting the matter to the Police and the Department of Communities and Justice (DCJ) (see Mandatory Reporting guidelines).
- . Incidents of substantiated sexual misconduct, which includes grooming behaviour, involving staff members must be reported to the Office of the Children's Guardian.
- . Allegations of sexual misconduct against a staff member or any person engaged by KCCS, including volunteers, must also be reported to the Office of the Children's Guardian.

Note: If evidence of grooming is found through electronic communications, the staff member reporting the grooming behaviour must take steps to preserve the electronic evidence.

KCCS Responsibility

- KCCS will ensure the safety and well-being of the student if they are the alleged victim of grooming behaviour.
- The Principal (or delegate) will contact the staff member who is the subject of the reported allegation in accordance with principles of procedural fairness.
- KCCS will conduct an internal investigation into the allegation. If the matter is of a serious nature, the Principal will refer the issue to the Police and relevant Child

Protection agencies.

- KCCS may suspend the staff member while the investigation is underway.

Record Keeping

- All forms of communication (including verbal, written, and digital) related to child protection matters must be accurately documented. This documentation should include dates, times, details of the communication, and any disclosures made by the student.
- KCCS maintains secure records of all evidence or documentation related to allegations. These records are stored securely in the Principal's office.

Confidentiality

Staff members who have access to information related to grooming behaviour must maintain confidentiality and disclose the information only as part of an investigation. If a student discloses alleged grooming behaviour, staff must report it to the Principal.

Any inappropriate breach of confidentiality may result in disciplinary action by KCCS, which, in serious cases, may include summary dismissal.

Definition Of Reportable Conduct Of A Worker

DEFINITION OF 'REPORTABLE CONDUCT'

Reportable conduct does not extend to:

- conduct that is reasonable for the purposes of the discipline, management or care of children, having regard to the age, maturity, health or other characteristics of the children and to any relevant codes of conduct or professional standards
- the use of physical force that, in all the circumstances, is trivial or negligible, but only if the matter is to be investigated and the result of the investigation recorded under workplace employment procedures.
- momentarily restraining a child to prevent them from hurting themselves or others, or touching a child to get their attention.
-
- conduct of a class or kind exempted from being reportable conduct

NOTE: Examples of conduct that would not constitute reportable conduct include (without limitation) touching a child in order to attract a child's attention, to guide a child or comfort a distressed child; a School teacher raising his or her voice in order to attract attention or to restore order in the classroom; and conduct that is established to be accidental.

Conduct Exempted from Reporting

- Finding made that allegation related to physical assault:
 - o Assault did not occur,
 - o Inappropriate professional behaviour occurred, or
 - o There is some evidence that inappropriate professional behaviour occurred but the allegation is not sustained because of insufficient evidence.

GUIDELINES FOR TEACHING AND PROTECTING CHILDREN AND YOUNG PEOPLE

KCCS expects all Staff members to be caring, compassionate adults who take an interest in the wellbeing of students, and who set appropriate boundaries for worker-student relations.

Staff members must be aware that their interactions with students are based on a trusting relationship arising from the nature of their role in KCCS, and that those relationships are open to scrutiny.

At all times Staff members must treat students with respect and behave in ways that promote their safety, welfare and wellbeing.

The following guide will help teachers (and community members) to identify appropriate and unacceptable professional practice in their conduct with students. The material below is not exhaustive but is provided as a guide to common situations. It works in tandem with the KCCS Child Protection Policy.

Good or Acceptable Practice

School and classroom culture

1. Develop School and classroom routines or structures that have clear boundaries of acceptable and professional student/teacher interaction.
2. Implement School guidelines that help prepare and plan such educational activities as excursions. Professional behaviour and supervision levels need to take into account the age of students and the educational context.
3. Know KCCS's Child Protection, Emergency Events, Safe and Supportive Environment Policy (Student Welfare, Behaviour and Discipline policies) and use behaviour management strategies that follow these policies.
4. Respond to provocative behaviour by students, parents or members of the Staff in a non-confrontational, calm manner to help defuse difficult situations. Seek support from colleagues or supervisors where needed. In extreme situations the Principal can call the Police to protect staff and students.

Teacher-student relationships

1. Avoid 1:1 contact with a student and only participating in contact with a student if it is necessary under the requirements of the role and only after obtaining informed consent of the student, the parent and the Principal; such contact includes meetings, sporting events, phone calls or electronic communications, such as text messages. Teachers are not to have contact with students via their personal social networking pages/sites unless they are family members.
2. If a student crosses emotional boundaries, inform supervisors so independent, sensitive

advice and support are available.

3. Praise and recognise all students when appropriate, so they all feel they are being treated fairly.
4. Avoid physical contact with students unless the contact was necessary for the purpose of discipline, management or care of a child having regard to the child's age, maturity, health or other characteristics.
5. When students, particularly very young children, are hurt and seek comfort it is appropriate to provide reassurance by putting an arm around them.
6. Be alert to cues from students about how comfortable they are in your proximity and respect individual needs for personal space. Physical contact must be avoided but if it is necessary for the purpose of the lesson, such as a demonstration in PE or drama lessons, explain the activity involved, what you will do and ask for the student's consent.
7. Be aware of cultural norms that may influence the interpretation of your behaviour towards students and perceptions of your behaviour that may lead to you being the subject of an allegation.

Interaction with students with identified needs

Be especially sensitive when interacting with students who may have poor 'boundaries' for appropriate behaviour after being traumatised by physical, emotional or sexual abuse, because they may misinterpret your action. As the adult and professional, it is always the staff member's responsibility to maintain professional boundaries and be aware of power imbalance

Poor or Unacceptable Practice

The following under each heading are considered poor or unacceptable practice:

School and classroom culture

1. Failure to develop School and classroom routines or structures that have clear boundaries of acceptable and professional student/teacher interaction.
2. Leaving a class unattended or dismissing students early from a lesson so that they are unsupervised.
3. Not reporting concerns about risk of harm to a child or misconduct of a staff member towards a student.
4. Attempting to physically prevent a student from entering or leaving a classroom, unless there is a concern for the safety of the student, other students or staff.
5. Engaging in inappropriate physical contact/force with a student including physical punishment of a child in the course of their role at KCCS.
6. Closing doors or windows to rooms without checking students is safely out of the way.
7. Correcting or disciplining a student in excess of what is reasonable or appropriate for the situation.
8. Shouting angrily at students to intimidate them.
9. Commenting to or about students on the basis of disability, gender, sexuality, cultural or racial stereotypes.

Care and management of students

1. Public disciplining or humiliating a student as punishment or as an example to other students.
2. Throwing an object such as a ball or book at a student to get their attention.
3. Threatening students with physical punishment.
4. Use of physical discipline such as smacking.
5. Providing inadequate supervision for students while on duty during excursions and camps.
6. Not appropriately responding to or referring to clear requests from students for medical attention or first aid.
7. Arranging activities or meetings alone with a student that are not within School guidelines or that are without the informed approval of a supervisor and, if appropriate, the parent or carer.
8. Targeting students unfairly for criticism or prejudging complaints from other staff or students about their behaviour based on past conduct.

Teacher-student relationships

A Staff member must not act recklessly in this regard. A single serious 'crossing of the boundaries' by a Staff member, or persistent less serious breaches of professional conduct in this area, may constitute serious misconduct, particularly if a Staff member either knows, or ought to have known, that such behaviour was unacceptable.

1. Crossing professional boundaries through behaviour that can reasonably be construed

as involving an inappropriate and/or overly personal or intimate relationship with, conduct towards, or focus on a student or a group of students.

2. All School members, including teachers, must not engage in grooming behaviour in relation to a student, their family or friends.
3. Acting in ways which may cause a student to reasonably fear that unjustified force will be used against them, even if this is not their intention.
4. Teasing students or unfairly withholding praise from them.
5. Putting your arms around students while instructing them on the computer or a desk.
6. Having any part of your body come into physical contact with a student without any justifiable reason or necessity to do so. For example, leaning towards a student while they are at their desk, standing very close next to a student while providing instructions.
7. Disregarding personal space practices.
8. Developing a practice of cheek kissing as a greeting or for congratulating students.
9. Repeatedly and unnecessarily touching students on the back, shoulders, arms or legs, or allowing a student to sit on your lap.
10. Disregarding policies relating to ICT and social media. Staff members are prohibited from photographing or filming a student other than for purposes approved by KCCS. Secretly taking photographs or other images of students is strictly prohibited.
11. Connecting with a student on your PERSONAL social media platform (eg Facebook, Twitter, Snapchat, Instagram, etc...).
12. Giving gifts of money to students as a reward or incentive for good behaviour or as a gesture of friendship.
13. Conversing about sexual matters unrelated to a syllabus.
14. Telling jokes of a sexual nature.
15. Making sexually explicit or suggestive remarks or engaging in other sexually overt behaviours towards, or in the presence, of, a student.
16. Showing inappropriate videos.
17. Deliberately exposing a student to the sexual behaviour of others, including access to pornography.
18. Consuming illegal drugs, restricted substances, alcohol or tobacco (inclusive of e-cigarettes) on School premises or at any School-related activity where a student is present.

Practices in the following bullet points are prohibited (and may also be criminal acts):

1. Having sexual relationships with students – whether the relationship is homosexual or heterosexual, consensual or non-consensual, or condoned by parents or carers. (The ages of the students or staff members involved are irrelevant).
2. Purchase for, offer, supply, give or administer to a student, including those over the age of 18, illegal drugs, restricted substances, prescribed or non-prescribed medication (unless dealing with or administering medication in accordance with relevant policy), alcohol, and/or tobacco.

3. Encouraging or condoning the use of alcohol or other drugs by students.
4. Possessing, downloading or distributing child abuse material. If you become aware of students being in the possession of child abuse material, follow KCCS's reporting procedures ensuring a report to the Principal who will in turn fulfill mandatory reporting obligations.
5. Commit a criminal offence involving a sexual activity that is committed against, with or in the presence of a student or any child or children in any other circumstances.

Interaction with students with identified needs

1. Using unnecessary force to make physical contact with a student as a prompt for a verbal instruction, or to force compliance.
2. Failing to implement strategies negotiated and outlined in individual student management programs.
3. Using physical contact to contain confrontational behaviour of students of all ages (particularly those with identified behaviour or conduct disorders), unless there is a concern for the safety of the student, other students or staff.

Procedures for Visitors to KCCS

1. Parents/Caregivers who wish to see the teacher of their own child during the day (whether by appointment or otherwise) must first report to the Front Office. When teaching staff organise interviews they need to inform parents to report to the Front Office when they arrive, so that staff can be notified of their arrival.
2. Visitors who have been invited to KCCS for an event, activity or an incursion need to be informed by staff to report to the Front Office on their arrival and sign in. Staff members are encouraged to give the Front Office prior notice of when their visitors are expected.
3. Within School hours, students are not allowed to go home with other people (such as their friend's parents) without written permission from their parents or direct verbal contact of parents with Office Staff, or if a Primary School aged student, their Primary teacher or Secondary student with their roll call teacher (See also Maintaining School Enrolment and Attendance Registers Policy).
4. During School hours, students cannot be given into the care of a non-custodial parent without the written permission of the custodial parent. (See also Maintaining School Enrolment and Attendance Registers Policy). All staff should be informed about these circumstances.
5. Adult visitors to KCCS are not to use the children's toilets. They are to use the staff toilets in the auditorium.

Applying the Guidelines to Certain Situations

In the day-to-day activities of KCCS, a full range of situations arise during which individuals and groups of students interact with staff members. These guidelines provide staff with examples of general directions that should be applied in most situations. It is recognised, however, that unusual circumstances, or concerns regarding student welfare and safety, may require a staff member to exercise their own professional judgement when interpreting the guidelines in particular situations.

Environment	General Principles	Alternatives & Suggestions
Class /Office	<ul style="list-style-type: none"> A staff member and one student, only, should not remain in a room together where they cannot be observed. 	<ul style="list-style-type: none"> Ensure lunchtime discipline involves more than one student. Where this is not possible avoid being alone with the student in an enclosed area. Consider being highly visible in an open space within clear line of sight of other staff. Combine lunchtime detentions with those of another teacher. Provide additional help and assistance to a student in a small group. Interview/counsel an individual student in full view of others (such as on playground seating, in a quiet corner of the class area with other students in the room). Interview/counsel a child in a room with door wide open & blinds up to allow observation, by others, from outside the room. Ask another member of staff to observe/participate in an interview with a student. Use more than one student helper when working in the classroom before and after school, or during breaks The Principal should keep their office door open. In case of a sensitive issue, if possible another person could be included in the interview with a student.
Playground / Toilets	<ul style="list-style-type: none"> A staff member and one student, only, should not remain together in a situation where they cannot be observed. 	<ul style="list-style-type: none"> Except in the case of a situation involving student safety and welfare, staff must always respect a student's privacy when using toilet/change-room facilities by not entering. Staff must not use student toilets. They are to use the staff toilets in the Administration building or Library building.
Touch for encouragement and comfort	<ul style="list-style-type: none"> In the context of a caring Christian community, there is a place for appropriate physical contact between a staff member and a student, especially a younger student. However, a staff 	<p>For encouragement and positive interaction, or to comfort a <i>K-6 student</i>, there is a place for:</p> <ul style="list-style-type: none"> the hand of the child to be held a gentle touch on the shoulder <p><i>For a Secondary student:</i></p> <ul style="list-style-type: none"> generally no physical contact only a pat on the back for congratulations, or shaking hands is recommended and always in a public space

Environment	General Principles	Alternatives & Suggestions
	<p>member should not touch a student on the chest or below the waist.</p>	
<p>Responding to student-initiated physical contact</p>	<ul style="list-style-type: none"> ● In the context of the caring Christian community of KCCS, it is fitting to respond to appropriate physical contact initiated by younger children (e.g. hand hold, hug). ● Staff should not initiate physical contact 	<ul style="list-style-type: none"> ● Staff should not initiate physical contact. ● Respond using one of the suggestions listed above (eg hug shoulder, shake hands or pat on the back for Secondary students). ● Responses should be governed by the context of the situation.
<p>Touch for discipline and management</p>	<ul style="list-style-type: none"> ● Except where physical intervention is necessary to ensure a student's safety, staff should not touch a student for the purposes of discipline or student management. ● Students should not be grasped, held, physically moved, tapped or restrained. ● No form of corporal punishment should be used. 	<ul style="list-style-type: none"> ● Give verbal instructions along with relevant hand or body-language indications. ● Maintain effective management routines and positive staff/student rapport. Reinforce positive behaviours. ● Use discipline strategies outlined in Discipline Policy. ● Move danger away from a child/young person, if possible. ● Provide physical barriers to protect children from danger. ● Provide children with appropriate behavioural models (Either the staff member, themselves, or another student).
<p>Camps and Excursions</p>	<ul style="list-style-type: none"> ● A staff member and one child/young person, only, 	<ul style="list-style-type: none"> ● Staff should only supervise same-gender bathrooms, and only when more than one student is present in

Staff-Student Interactions Outside School Hours

Purpose:

To ensure the safety, wellbeing, and trust of students, and to protect staff, KCCS requires all staff to maintain clear professional boundaries in all interactions outside school hours. This supports a safe and supportive environment for every student.

Scope:

This section applies to all staff, including teaching and administrative staff, at KCCS.

Guidelines:

1. **Private Overnight Arrangements**
 - Staff must **not host students overnight** in their homes.
 - Even with parental consent or long-standing trust, overnight stays create significant safeguarding, legal, and reputational risks.
2. **Exceptional School-Related Activities**
 - Any overnight activity related to school (e.g., camps or excursions) must have **prior written approval from the Principal**.
 - Approval must include a clear plan outlining supervision, sleeping arrangements, and parental consent.
3. **Maintaining Professional Boundaries**
 - Staff must maintain professional boundaries at all times.
 - Students must have separate sleeping areas, and staff must avoid being alone with a student in private settings.
4. **Additional Supervision**
 - Whenever possible, another approved adult should be present to share supervision, ensuring safety for both students and staff.
5. **Documentation and Communication**
 - All arrangements must be documented in writing and communicated to parents and the Principal.
 - Records should include the purpose, participants, duration, location, and supervision plan.
6. **Safeguarding Compliance**
 - Staff must comply with all KCCS safeguarding guidelines, child protection legislation, and professional standards.
 - Staff are responsible for completing regular safeguarding training.
7. **Community Considerations**
 - Even within trusted communities, including church connections or long-term relationships, professional boundaries must always be maintained.
 - Personal familiarity or trust does not override the need for safety and propriety.

Responsibilities:

- All staff are responsible for following these guidelines.
- The Principal is responsible for approving any exceptional overnight activities and monitoring compliance.

Consequences of Non-Compliance:

Failure to comply with these guidelines may result in disciplinary action, up to and including termination of employment, and may involve legal or regulatory consequences.

Responding To Child Abuse Material

1. Policy Statement

Kingdom Culture Christian School is committed to safeguarding every child entrusted to our care. Any matter involving child abuse material will be addressed promptly, lawfully, and with pastoral sensitivity.

The school recognises that incidents involving child abuse material may involve both victimisation and harmful behaviour by students. Our response will prioritise safety, compliance with legislation, and appropriate support for all students involved.

2. Definition

Under the *Crimes Act 1900 (NSW)*, child abuse material includes material that depicts or describes, in a way that reasonable persons would regard as offensive:

- A child as a victim of torture, cruelty or physical abuse
- A child engaged in or apparently engaged in a sexual pose or sexual activity;
- A child in the presence of another person engaged in sexual activity; or
- The private parts of a person who is, appears to be, or is implied to be a child.

Material may include images, videos, GIFs, written stories, messages, digital communications, or physical items.

3. Immediate Staff Response

If a staff member becomes aware of an incident involving child abuse material, they must:

3.1 Staff must not:

- View the material.
- Request that the material be sent, forwarded, or shown to them.
- Attempt to investigate independently.

3.2 Staff must:

1. Remain calm and supportive.
2. Clarify basic contextual information (see Section 4).
3. Immediately notify the Principal or delegated Child Protection Officer.
4. Record factual notes.

Principal must:

5. Complete the Mandatory Reporter Guide (MRG).
6. Report to NSW Police.
7. Report to the NSW Department of Communities and Justice (DCJ) where required.
8. Consider referral to the eSafety Commissioner for assistance with removal of online material.

All actions must occur as soon as reasonably practicable.

4. Clarifying the Context

Staff may ask neutral, non-leading questions to establish:

- Who is disclosing? (student/parent/teacher/ other)
- What is the CAM (ie photo/written words...)?
- Was it consensual?
- Has it been shared? (where/with whom)
- Other contextual factors.
- Ages of students involved.
- Whether coercion, pressure, grooming, or power imbalance is present.

Staff must not request graphic details or conduct detailed interviews.

5. Mandatory Reporting Obligations

All staff are mandatory reporters under the *Children and Young Persons (Care and Protection) Act 1998 (NSW)*.

A report must be made where there are reasonable grounds to suspect a child or young person is at Risk of Significant Harm (ROSH).

When completing the MRG:

- Select the “Sexual Abuse” decision tree.
- For students displaying problematic sexualised behaviour, select the relevant sexual abuse pathway.
- For students who are victims of alleged behaviour, select sexual abuse, noting that non-contact abuse includes exposure to explicit material or sexualised communication.
- Consider power imbalance and grooming behaviours.

Internal reporting must follow the school’s Centralised Reporting Model.

6. Reporting to Police

All incidents involving child abuse material must be reported to NSW Police.

This applies to:

- Non-consensual sharing.
- Consensual image sharing between students.

Determination of any legal exemption is a matter for the Police, not the school.

7. Student Wellbeing and Pastoral Response

The school will:

- Provide pastoral care and counselling support as appropriate.
- Take reasonable steps to prevent further distribution of material.
- Inform and engage parents or carers unless otherwise directed by statutory authorities.
- Address behaviour in line with the Behaviour Management Policy.
- Apply consequences where required, balanced with restorative practices.

Our approach will reflect both accountability and restoration.

8. Behaviour Management Alignment

Where a student has engaged in behaviour involving child abuse material, disciplinary responses will align with the Behaviour Management Policy and may include:

- Formal warnings;
- Suspension;
- Risk management plans;
- Behaviour contracts;
- Referral to external support services;
- Expulsion in serious cases.

Decisions will consider:

- Age and maturity;
- Intent and level of coercion;
- Degree of distribution;
- Impact on victims;
- Advice from Police and DCJ.

9. Prevention and Education

The school is committed to preventative education through:

- Digital citizenship programs;
- Age-appropriate teaching on online safety;
- Explicit teaching about consent and respectful relationships;
- Education regarding the legal and relational consequences of sharing sexual images.

These preventative measures are reinforced through the Digital Use Policy and student wellbeing programs.

Students will be taught that:

- Once images are shared online, they are extremely difficult to remove.
- Sharing sexual images may constitute a criminal offence.
- Online behaviour has lasting consequences.

10. External Support and Online Removal

Where material has been shared online, the school may contact the eSafety Commissioner for assistance with removal and further guidance.

Centralised Reporting Procedure

1. Purpose

Kingdom Culture Christian School adopts a Centralised Reporting Model to ensure that all child protection concerns are managed consistently, lawfully and without delay.

This model provides clarity for staff, protects students, and ensures statutory obligations are met.

2. Internal Reporting Structure

All staff are mandatory reporters. However, the school operates a centralised process for managing reports.

2.1 Immediate Reporting

Any staff member or volunteer who forms a reasonable suspicion that a child or young person may be at Risk of Significant Harm (ROSH) must:

1. Report the concern immediately to the Principal; or
2. If the Principal is unavailable, report to the delegated Teaching and Learning Coordinator.

Verbal notification must occur as soon as practicable on the same day the concern arises.

Staff must not delay reporting while gathering additional evidence.

3. Role of the Principal / Delegate

The Principal (or delegate) will:

- Review the concern promptly.
- Complete the Mandatory Reporter Guide (MRG) in consultation with the reporting staff member where appropriate.
- Determine whether the threshold for reporting to the NSW Department of Communities and Justice (DCJ) has been met.
- Make the report to DCJ where required.
- Ensure NSW Police are contacted where legislation requires (including matters involving child abuse material).
- Determine appropriate interim risk management steps within the school.
- Ensure pastoral support is arranged.

The Principal retains responsibility for ensuring that statutory obligations are fulfilled.

4. Documentation

All child protection concerns must be documented factually and objectively.

Documentation must:

- Record dates, times and observations.
- Include the exact words used by the child where possible.
- Avoid opinion or interpretation.

All records will be stored securely in Compass under restricted access.

Access is limited to the Principal and authorised personnel only.

5. Direct Reporting by Staff

While the school operates a Centralised Reporting Model, staff retain their legal obligation as mandatory reporters.

If a staff member believes a reportable matter has not been acted upon appropriately, or if the concern involves the Principal, the staff member must make a direct report to DCJ and inform the Chair of the Board.

6. Confidentiality

All child protection matters are strictly confidential.

Information will only be shared:

- With statutory authorities as required by law;
- With staff who need to know for risk management purposes;
- With parents or carers, unless advised otherwise by DCJ or Police.

7. Protection for Staff

Staff who make reports in good faith are protected under NSW legislation.

No staff member will suffer detriment for raising a genuine child protection concern.