Child Safety Code of Conduct

Help for non-English speakers
If you need help to understand this policy, please contact info@ae.edu.au.

1.0 Rationale

Our Child Safety Code of Conduct sets out the expected behaviour of adults with children and young people in our school. Members of the Acknowledge Education community have a responsibility to ensure children and young people are safe in all school environments and school related activities. This includes recognising that the organisation and its representatives owe a duty of care to students to take reasonable measures to protect them from reasonably foreseeable risks of injury, including risks arising from the environment, activities, and interactions with others.

A Child Safety Code of Conduct lists behaviours that are acceptable and those that are unacceptable. It provides a high-level statement of professional boundaries, ethical behaviour and acceptable and unacceptable relationships. For more detail refer to the College's Staff and Student Professional Boundaries Guidelines.

When individuals are clear about behavioural expectations, they are much more likely to act appropriately with each other and with children. When everyone is educated about the Code of Conduct and the reasons it is so important to uphold, the College environment becomes much more transparent and people are accountable for their behaviour. Above all, a Child Safety Code of Conduct helps to protect children from harm.

2.0 Scope

This code of conduct:

- applies to all AE (Stott's College) staff, volunteers, contractors, service providers, Board members and any other adult involved in child-connected work must follow the Child Safety Code of Conduct.
- applies in all physical and online school environments used by students during or outside of school hours, including other locations provided by for a student's use (for example, a school camp) and including locations managed by third-party providers, such as AE's boarding and homestay programs.
- should be read together with our other child safety and wellbeing policies, procedures, and codes – refer to the related college policies section below.

3.0 The Code

3.1 Acceptable behaviours

As AE/Stott's College staff, volunteers, contractors, and any other member of our school

community involved in child-connected work, we are responsible for supporting and promoting the safety of children by:

- upholding our School commitment to child safety at all times and adhering to our *Child Safety and Wellbeing Policy*.
- treating students and families in our school community with respect in our school environment and outside our school environment as part of normal social and community activities.
- listening and responding to the views and concerns of students, particularly if they disclose that they or another child or student has been abused or are worried about their safety or the safety of another child or student.
- promoting the cultural safety, participation and empowerment of Aboriginal students, students with culturally and/or linguistically diverse backgrounds, students with a disability, international students, students who are unable to live at home and lesbian, gay, bisexual, transgender and intersex (LQBTIQ+) students.
- ensuring, as far as practicable, that adults are not alone with a student – one-to-one interactions between an adult and a student are to be in an open space or in line of sight of another adult, recognising that increased supervision and additional precautions may be required for younger students and students with disabilities.
- reporting any allegations of child abuse or other child safety concerns to the Head of School.
- understanding and complying with all reporting and disclosure obligations, including **mandatory reporting*** to Victoria Police as soon as practicable where a person aged 18 years or over forms a **reasonable belief**** that a sexual offence has been committed against a child under 16 years by another adult.
- if child abuse is suspected, ensuring as quickly as possible that the student(s) are safe and protected from harm.
- taking reasonable steps to protect students from reasonably foreseeable risks of harm, including maintaining safe environments and acting in accordance with the organisation's duty of care obligations at all times.
- actively identifying and assessing whether a "substantial risk" of a sexual offence to a student exists, and taking immediate and appropriate action to reduce or remove that risk in accordance with this Code and related policies, and not negligently failing to take such action.

* Please refer to Section 5.21 and 5.1.5 of the *Child Safety and Wellbeing Policy* for **mandatory reporting** obligations.

** Please refer to Section 5.21 of the *Child Safety and Wellbeing Policy* and Section 3.1 of the *Guidelines to responding to incidents, disclosures and suspicions of child abuse* for an explanation of **reasonable belief**.

3.2 Unacceptable behaviours

As AE/Stott's College staff, volunteers, contractors and members of our school community involved in child-connected work we must not:

- ignore or disregard any concerns, suspicions or disclosures of child abuse or harm
- developing or attempting to develop a relationship with any student or their carer that could be seen as favouritism or amount to grooming* behaviour (for example, by offering gifts)

- display behaviours or engage with students in ways that are not justified by the educational or professional context
- ignore an adult's overly familiar or inappropriate behaviour towards a student
- discuss intimate topics or use sexualised language, except when needed to deliver the school curriculum or professional guidance
- treat a child or student unfavourably because of their disability, age, gender, race, culture, vulnerability, sexuality or ethnicity
- communicate directly with a student through personal or private contact channels (including by social media, email, instant messaging, texting etc) except where that communication is reasonable in all the circumstances, related to schoolwork or extra-curricular activities or where there is a safety concern or other urgent matter
- photograph or video a child or student in a school environment except in accordance with the Photographing, Filming and Recording Students policy or where required for duty of care purposes
- consume alcohol against school policy or take illicit drugs in the school environment or at school events where students are present
- have contact with any student outside of school hours except when needed to deliver the school curriculum or professional guidance and parental permission has been sought, or where required to meet duty of care obligations in response to a safety or wellbeing concern
- negligently failing to identify, assess, or act on a "substantial risk" that a student may become the victim of a sexual offence, where the person has the power or responsibility to reduce or remove that risk (failure to protect).

* **Grooming** refers to conduct where a person aged 18 years or older communicates, by any means (including words or actions, and regardless of whether a response is received), with:

- a person under the age of 16 years; or
- a person who has care, supervision, or authority over a person under the age of 16 years,

with the intention of facilitating the involvement of the person under 16 years of age in a sexual offence, whether committed by the individual or by another person aged 18 years or older (per section 49M(1) of the Crimes Act 1958 (Vic))

** Please refer to Section 5.2 of *VCE-POL-01 Child Safety and Wellbeing Policy* for an explanation of "**substantial risk**".

4.0 Breaches of the Code

All AE/Stott's College staff, volunteers, contractors, and any other members of the school community involved in child-connected work who breach this Child Safety Code of Conduct may be subject to disciplinary action in accordance with their employment agreement, relevant industrial instrument, professional code, or terms of engagement.

Under the Reportable Conduct Scheme, the CEO, as head of the organisation, is required to notify the Social Services Regulator of all allegations of reportable conduct involving employees, contractors, or volunteers, and to ensure that such allegations are appropriately investigated.

Following the management of any immediate health and safety concerns, staff and volunteers must report suspected child abuse to the relevant authorities, regardless of whether there is a legal obligation to do so, and must cooperate with law enforcement agencies (e.g. Victoria Police). Failure to report physical or sexual child abuse may constitute a criminal offence.

All breaches and suspected breaches of the AE/Stott's College Child Safety Code of Conduct must be reported to the Head of School (HoS) and CEO. Where the breach or suspected breach involves the HoS or CEO, the matter should be reported to the Head of Operations at operations@ae.edu.au.

Breaches of this Code may also constitute criminal offences, including offences relating to failure to disclose and failure to protect a child from a sexual offence under the Crimes Act 1958 (Vic).

This includes circumstances where a person in a position of authority fails to take reasonable steps to reduce or remove a substantial risk of child sexual abuse.

This includes negligent failure to reduce or remove a substantial risk of child sexual abuse where a person has the authority or responsibility to do so.

5.0 Roles and Responsibilities

Board of Directors

- Ensure the school maintains full compliance with the Child Safety Code of Conduct and all related child safety legislation.
- Provide governance oversight of child safety culture, risks, and organisational accountability.
- Support adequate resourcing for child safety training, reporting systems, and safe environments.
- Uphold the Code in all child-connected contexts and model expected standards of behaviour.
- Respond appropriately to any allegations involving Board members and ensure proper escalation.
- Ensure AE meets its duty of care obligations to students, including taking reasonable steps to protect them from foreseeable risks of harm, maintaining safe environments, and preventing child abuse by individuals associated with the organisation.

Chief Executive Officer (CEO)

- Ensure organisation-wide implementation of the Child Safety Code of Conduct.
- Oversee and act on reports of child safety concerns or breaches escalated by the Head of School.
- Notify the Social Service Regulator of all allegations of reportable conduct by employees, contractors and volunteers, and to ensure the allegations are investigated.
- Support and supervise the Head of School so they can enforce the Code effectively.
- Ensure all staff/contractors/volunteers receive induction and ongoing training related to the Code.
- Ensure systems, processes and controls are in place to discharge the organisation's duty of care, including risk mitigation, safe environments, and safeguards to prevent harm to students.
- Ensure that any identified or suspected substantial risk of child sexual abuse is promptly assessed, documented, and acted upon, including escalation to relevant authorities where required

Head of School (HoS) & VCE Coordinator

- Lead day-to-day enforcement of the Child Safety Code of Conduct within the school.

- Receive and manage child safety concerns, breaches, disclosures, or allegations.
- Immediately ensure student safety where abuse is suspected or disclosed.
- Escalate all breaches and reportable allegations to the CEO and, where required, to the appropriate external authorities.
- Promote and model safe, respectful, culturally inclusive practices.
- Ensure staff understand acceptable and unacceptable behaviours, reporting duties, and the PROTECT Four Critical Actions.
- Monitor staff conduct, respond to inappropriate behaviour, and enact disciplinary processes.
- Ensure day-to-day practices reflect the organisation's duty of care, including proactive identification and mitigation of foreseeable risks, maintaining safe premises, and implementing additional safeguards for younger students and students with disabilities where required.
- Ensure that staff actively identify and respond to any substantial risk of child sexual abuse and take immediate steps to reduce or remove that risk.

Student Care / Wellbeing Team

- Support students who disclose or are affected by safety concerns, ensuring immediate steps to protect them from harm.
- Assist in identifying inappropriate behaviour, boundary concerns, or patterns of risk.
- Guide staff and students on safe, respectful interactions and appropriate professional boundaries.
- Work with HoS and CEO to report concerns and ensure that reporting obligations (mandatory reporting, RCS requirements) are met.
- Promote inclusion, empowerment, and cultural safety for all student groups, especially vulnerable cohorts.
- Maintain wellbeing records relevant to child safety incidents and follow confidentiality requirements.
- Support the implementation of duty of care by identifying risks, supporting vulnerable students, and ensuring appropriate and proportionate safeguards are in place, particularly for younger students and students with disabilities.

6.0 Definitions

For the purposes of this policy, readers should refer to the Child Safe Standards – Definitions provided by the Victorian Government for the definitions of terms used in relation to the Victorian Child Safe Standards and Ministerial Order 1359.

7.0 Related policies

- VCE-POL-01 Child Safety and Wellbeing Policy
- VCE-POL-02 Student Wellbeing and Engagement Policy
- VCE-GUI-06 Guidelines to responding to incidents, disclosures and suspicions of child abuse
- VCE-POL-05 Bullying Prevention Policy
- VCE-POL-13 ICT Policy

8.0 Document Information

Document Name	Child Safety Code of Conduct
Document Number	VCE-CC-03
Purpose	Compliance with Child Safety Standards & Ministerial Order

Audience	☒Staff | ☒Students| ☒Public
Category	Learning Environment
Subcategory	Wellbeing and Engagement
Approval Date	18/12/2025
Effective Date	18/12/2025
Date of last approval	08/05/2026
Next Review Date	08/05/2028 (Review required at least every two years, or after any significant child safety incident)
Policy Advisor	Head of School, VCE Coordinator, Head of Quality and Risk
Approving Authority	Board of Directors

9.0 Change Log

Date	Version	By	Notes
29/04/2026	4.1	HQR	• Updated the Code of Conduct to explicitly incorporate duty of care obligations, including protecting students from foreseeable risks of harm, maintaining safe environments, preventing abuse, and recognising the need for enhanced supervision and safeguards for younger students and students with disabilities. • Added clauses to incorproate the CEOs obligation, as head of the organisation, to notify the Social Service Regulator of all allegations of reportable conduct by employees, contractors and volunteers, and to ensure the allegations are investigated per the Reportable Conduct Scheme • Added reference to mandatory reporting obligations captured in our Child Safety and Wellbeing Policy in line with the Children, Youth and Families Act 2005. • Added references relating to section 327 of the Crimes Act 1958 (Vic) - a person of or over the age of 18 years who has information that leads the person to form a reasonable belief that a sexual offence has been committed in Victoria against a child under the age of 16 years by another person of or over the age of 18 years • Added definition of of grooming as per section 49M(1) of the Crimes Act 1958 (Vic) • Added information relating to the offence of failure to protect a child from a sexual offence per the Crimes Act 1958 (Vic). • Added information relating to actions required

			and responsibilities when there is a "substantial risk" of child abuse occuring. • Added that the College must not negligently fail to reduce or remove the risk.
01/12/2025	4.0	HQR	Supercedes V3. Re-structured and re-written. Updated in line with DoE standardiserd Code of Conduct template.