



# Star of the Sea School

OSHC  
*Child Protection Policy*

*Open Hearts Open Minds*



## **SCHOOL VISION STATEMENT**

Our school is built on the core values of respect, inclusivity, compassion, collaboration and honesty. We support our families as the first and foremost educators of their child's faith development. Our vision paves the way for educating students for the 21st century but also draws from our history and tradition.

We guide our learners to be self-managed, innovative and critical thinkers who have a strong sense of who they are and their relationship in their world. As a learning community, we value the skills necessary to build meaningful relationships and for learners to be connected to each opportunity to develop their own personal growth. We encourage our learners to question, explore and discover so they actively contribute to a more compassionate society.

## **PURPOSE**

At Star of the Sea School, we believe that safety is a fundamental human right and an essential foundation for learning and growth. In our Out of School Hours Care (OSHC) service, we are committed to ensuring that every child feels emotionally and physically safe at all times.

While the primary responsibility for a child's protection lies with their family, our service plays a vital role in supporting and upholding this responsibility. We do so through vigilant practices, nurturing relationships, and a proactive commitment to child safety.

Guided by Gospel values of justice, dignity, and respect for each individual, our policy is also shaped by our obligations within the broader legal and community context in which Catholic schools operate. We are committed to meeting all legislative requirements to safeguard the wellbeing of every child in our care.

## **POLICY STATEMENT**

At Star of the Sea OSHC, we are deeply committed to the safety, wellbeing, and support of all children and young people in our care. Management, staff, and volunteers are expected to uphold the highest standards of respect, understanding, and compassion in every interaction with children.

Our Service is guided by the belief that:

- Children experience the same range of emotions as adults.
- Their emotions are real, valid, and must be acknowledged and accepted by the adults around them.

- Adult responses during a child's early emotional development can significantly impact their growth positively or negatively.
- When children are supported to recognise and understand their bodily responses to emotions, they are better equipped to anticipate outcomes and take protective actions, such as seeking help or avoiding harm.

To uphold these principles, we are committed to identifying and minimising risks of harm to children and young people through proactive strategies and safe practices. In all circumstances, we act in the best interest of the child.

We ensure that every educator is informed about current child protection legislation relevant to our jurisdiction and understands their legal and ethical responsibilities. As educators, we hold a vital duty to promote the safety, welfare, and wellbeing of all children.

Through this commitment, we strive to create a safe, nurturing environment where every child is empowered to reach their full potential free from harm, neglect, or abuse.

## NATIONAL QUALITY STANDARDS

QA 2 <i>Children's Health and Safety</i>	2.2	Each child is protected
	2.2.1	Every precaution is taken to protect children from harm and any hazard likely to cause injury
	2.2.3	Management, Educators and employees are aware of their roles and responsibilities to respond to every child at risk of abuse or neglect
QA 7 <i>Governance</i>	7.1	Governance supports the operation of a quality service
	7.1.2	Systems are in place to manage risk and enable effective management and operation of a quality service

## EDUCATION AND CARE SERVICES NATIONAL REGULATIONS

<i>Children (Education and Care) National Law</i>	84	Awareness of Child Protection Law
	273	Course in Child Protection

## RELATIONSHIP TO OTHER POLICIES

Child Safe Policy	Interactions with Children
Staffing Policy	Excursion Policy
Confidentiality policy	Philosophy

## SCOPE

This policy applies to all children, families, employees, management, and visitors of the service. It is guided by the *Children and Young People (Safety) Act 2017*, which defines harm to a child as including physical or psychological injury resulting from sexual, physical, emotional, or mental abuse or neglect.

A child is considered to be at risk of harm if they:

- Have experienced or are likely to experience harm
- Are at risk of being taken out of the State by a parent, guardian, or another individual for the purpose of undergoing an illegal procedure (including female genital mutilation), participating in an unlawful marriage, or engaging in criminal activity
- Have been abandoned, or their parent(s)/guardian(s) are unable, unwilling, or unfit to provide appropriate care; or if the child's caregiver cannot be located or is deceased
- Have been persistently absent from school without a valid or acceptable reason
- Are without a safe and stable place to live (homeless)

## INDICATORS OF HARM

There are a range of signs that may indicate a child is experiencing harm. These behavioural or physical signs are referred to as indicators. The following information serves as a general guide.

While a single indicator on its own may not confirm abuse or neglect, it can still be significant especially when viewed alongside other indicators or within the broader context of the child's situation. Each concern must be carefully considered in relation to the child's unique circumstances.

A child's behaviour may change noticeably when they are under stress. Identifying the specific cause of that stress is essential, as it may stem from a variety of factors. Abuse or neglect may occur as isolated incidents or as ongoing experiences and may be either intentional or unintentional.

## GENERAL INDICATORS OF ABUSE AND NEGLECT

Some behaviours and physical signs may suggest a child is experiencing abuse or neglect. While a single sign may not confirm harm, it should not be ignored especially when considered alongside other indicators and the child's circumstances.

### Possible indicators include:

- Unexplained or delayed medical treatment following an injury
- A pattern or history of frequent injuries
- Inconsistencies in the explanation of how an injury occurred
- A disclosure from the child that someone has hurt them
- The child reports someone they know has been harmed
- A third party (relative, friend, acquaintance, sibling) expresses concern that the child may have been abused

**Neglect** refers to the ongoing failure by a parent or caregiver to provide for a child's basic physical and emotional needs. This includes access to food, clothing, safe shelter, medical and dental care, and adequate supervision.

### Examples of neglect may include:

- Consistent lack of emotional responsiveness toward the child
- Abandonment or leaving the child without appropriate care
- Withholding physical contact or affection
- Failing to support the child's emotional or psychological wellbeing
- Showing favouritism or treating one child differently to others

## INDICATORS OF NEGLECT IN CHILDREN

- Poor standard of hygiene leading to social isolation
- Scavenging or stealing food
- Extreme longing for adult affection
- Lacking a sense of genuine interaction with others
- Acute separation anxiety
- Self-comforting behaviours, e.g. rocking, sucking
- Delay in development milestones
- Untreated physical problems
- Failure to thrive
- Prone to illness
- Unsuitable or inadequate clothing

## INDICATORS OF ABUSE IN CHILDREN

Physical abuse occurs when a child experiences, or is at risk of experiencing, non-accidental trauma or injury caused by a parent, caregiver, or another individual. Educators and staff within the OSHC setting play a critical role in identifying potential signs of abuse and ensuring the safety and wellbeing of all children.

## Risk Factors and Concerning Behaviours in Caregivers

Staff should be particularly vigilant if a parent or caregiver:

- Expresses direct concerns about their own ability to manage frustration or control anger toward their child
- Has a known history of family violence
- Has themselves experienced childhood maltreatment
- Frequently seeks medical attention for their child without clear medical need

## PHYSICAL INDICATORS OF ABUSE IN CHILDREN

The following signs may suggest physical abuse. While any one indicator may not confirm abuse, a combination or pattern of these signs should prompt further concern:

- Unexplained bruising to the face, head, or neck
- Lacerations or welts on the body
- Explanations that do not align with the nature or severity of the injury
- Bruises or marks that resemble objects (e.g., belt, handprint)
- Bite marks or scratch injuries
- Multiple bruises or injuries at varying stages of healing
- Evidence of ingestion of harmful substances such as alcohol, drugs, or poisons
- Sprains, dislocations, or unexplained joint injuries
- Fractured or broken bones without a clear cause
- Burns or scalds, particularly in patterns (e.g., glove or stocking-like burns)

## EMOTIONAL ABUSE

Emotional abuse occurs when an adult repeatedly interacts with a child in ways that impair the child's emotional development and ability to express and manage their feelings. This form of abuse can be subtle yet deeply damaging, and educators must remain vigilant in recognising the signs.

This may include:

- Constant criticism, condescending, teasing of a child or ignoring or withholding admiration and affection
- Excessive or unreasonable demands
- Persistent hostility, severe verbal abuse, and rejection
- Belief that a specific child is bad or "evil"
- Using inappropriate physical or social isolation as punishment
- Exposure to domestic violence
- Indicators of emotional abuse
- Feeling of worthlessness about them
- Inability to value others
- Lack of trust in people and expectations
- Extreme attention-seeking behaviours
- Other behavioural disorders (disruptiveness, aggressiveness, bullying)

## SEXUAL ABUSE

Sexual abuse occurs when an adult engages a child in sexual activity by exploiting their authority or breaching the child's trust. This often involves manipulation, bribery, or threats both physical and psychological to coerce the child into participation.

Educators will remain especially vigilant for signs of potential sexual abuse, particularly where a parent or caregiver is suspected or has been charged with such offences, or when they exhibit inappropriate jealousy toward a child's age-appropriate steps toward independence from the family.

This may include:

- Exposing the child to sexual behaviours of others
- Coercing the child to engage in sexual behaviour with other children
- Verbal threats of sexual abuse
- Exposing the child to pornography. Indicators of Sexual Abuse
- They describe sexual acts
- Direct or indirect disclosures
- Age-inappropriate behaviour and/or persistent sexual behaviour
- Self-destructive behaviour
- Regression in development achievements
- Child being in contact with a suspected or known perpetrator of sexual assault
- Bleeding from the vagina or anus
- Injuries such as tears to the genitalia

## PSYCHOLOGICAL ABUSE

Psychological harm occurs when the behaviour of the parent or caregiver damages the confidence and self-esteem of the child, resulting in serious emotional deficiency or trauma. In general, it is the frequency and duration of this behaviour that causes harm.

This may include:

- Excessive criticism
- Withholding affection
- Exposure to domestic violence
- Intimidation or threatening behaviour. Indicators of psychological abuse
- Constant feelings of worthlessness
- Unable to value others
- Lack of trust in people
- Lack of people skills necessary for daily functioning
- Extreme attention-seeking behaviour
- Extremely eager to please or obey adults
- Takes extreme risks, is markedly disruptive, bullying or aggressive
- Suicide threats
- Running away from home.

## DOMESTIC VIOLENCE

Domestic violence, also referred to as intimate partner violence, is a serious violation of human rights. It involves any form of violent, abusive, or intimidating behaviour used by an adult to exert power and control over a current or former partner. This behaviour may result in physical, emotional, or psychological harm, and often instills fear in those affected.

The impact of domestic violence on children and young people can be significant and lasting. Exposure to such violence either directly or indirectly can cause emotional trauma, behavioural issues, and developmental challenges, and may be considered a form of child abuse.

At Star of the Sea OSHC, we are committed to the safety and wellbeing of all children. Educators are alert to the signs of domestic violence and understand the importance of responding appropriately and sensitively, in line with child protection laws and service procedures.

## INDICATORS OF DOMESTIC VIOLENCE

- Show aggressive behaviour
- Develop phobias & insomnia
- Experience Anxiety
- Show symptoms of depression
- Have diminished self esteem
- Demonstrate poor academic performance and problem-solving skills
- Have reduced social competence skills including low levels of empathy
- Show emotional distress
- Have physical complaints



## SIGNIFICANT RISK OF HARM

A significant risk of harm exists when concerns for a child's safety, wellbeing or welfare are substantial and warrant a response from statutory authorities, such as the South Australian Police or Community Services, regardless of family consent. As outlined in *Keep Them Safe*, a "significant" concern is not minor or trivial. It may result from a single serious incident or an accumulation of concerning behaviours or omissions and is reasonably expected to cause adverse impacts on the child.

## REASONABLE GROUNDS

Reasonable grounds refer to having a sound, objective basis for suspecting that a child may be at risk of abuse or neglect. This may be based on:

- Direct observation of the child or their family
- Disclosures made by the child, a parent, or another person
- Professional judgement based on training, experience, and indirect signs

## CHILD PROTECTION MANAGEMENT STRATEGY

Star of the Sea OSHC is committed to ensuring the safety, health, and wellbeing of every child in our care. The Approved Provider, Nominated Supervisor, staff, and volunteers will implement a comprehensive Child Protection Risk Management Strategy to:

- Protect children from harm
- Promote safe, supportive environments
- Maintain the integrity and accountability of staff and volunteers

This strategy includes the following key components:

- Purpose - To define the importance of safeguarding children in all service operations
- Code of Conduct - Clear expectations for appropriate behaviour with children
- Recruitment, Selection and Training - Ensuring all staff and volunteers are screened, trained, and supported to uphold child protection principles
- Supervision - Maintaining active and appropriate supervision of children at all times
- Relationships with Children - Promoting respectful, nurturing, and safe interactions
- Managing Disclosures and Suspicions of Harm - Clear procedures for reporting, documenting, and responding to concerns of abuse or neglect
- Managing Breaches - Procedures to address breaches of policy or conduct
- Risk Management - Identifying and managing risks related to high-risk activities and special events
- Communication and Support Strategies - Ensuring staff, children, and families are informed, supported, and engaged in promoting a safe environment

## CODE OF CONDUCT

All employees and volunteers at our service are mandated reporters and are required to report any concerns of child abuse or neglect as soon as practicable, where there are reasonable grounds to suspect a child is, or may be, at risk of harm. It is not necessary for the reporter to have proof that harm has occurred.

All staff and volunteers are expected to engage respectfully with all members of the education and care community. They have a duty to identify and act upon any behaviours that compromise the safety and wellbeing of children and young people. All interactions must align with approved protective practices and uphold the highest standards of physical and emotional safety.

## RECRUITMENT, SELECTION AND TRAINING PROCEDURES

The Nominated Supervisor, in collaboration with the Director, is responsible for implementing recruitment, induction, training, and ongoing professional development procedures. These ensure all staff and relevant volunteers are appropriately screened, understand their responsibilities, and are equipped to identify and respond to disclosures or suspicions of harm.

### Key requirements include:

- Clearly defined job advertisements outlining required qualifications, skills, and a commitment to child safety.
- Comprehensive job descriptions detailing professional responsibilities and expectations.
- Recruitment processes that ensure all staff and volunteers possess valid Working With Children Checks (WWCC).
- A documented induction/orientation process including:
  - Child safety and protection
  - Supervision expectations
  - Compliance with National Law and Regulations, NQS, Code of Conduct, and service policies.
- Ongoing annual training and development to reinforce:
  - Roles and responsibilities in child protection
  - Reporting obligations
  - Recognition of indicators of harm
  - Accurate documentation and reporting procedures.
- Annual performance appraisals to review and support staff capability in safeguarding children.
- Integration of child protection and risk management strategies into staff meetings at least twice annually.
- Annual review of training plans, ensuring they include up-to-date child protection procedures (e.g., managing disclosures and suspicions of harm).
- Providing ongoing access to relevant legislation, resources, and support materials to help staff and volunteers meet their legal and ethical obligations.

## SUPERVISION

Staff must always remain vigilant and fully aware of both the children and their surroundings. Active supervision in all accessible areas is essential in maintaining a safe and supportive environment. Volunteers and visitors must be appropriately supervised and are not to be left alone with individual children or groups under any circumstances.

## RELATIONSHIPS WITH CHILDREN

Staff are committed to building genuine, respectful relationships with each child. This includes taking the time to observe each child individually, actively listening to their reflections on their day, and engaging with their experiences. Staff will also be attentive to nonverbal cues such as body language, facial expressions, creative output, and interactions with peers, recognising these as important insights into each child's wellbeing and development.

## PROCEDURES FOR MANAGING DISCLOSURES AND SUSPICIONS OF HARM

### What is a disclosure of harm?

A disclosure of harm occurs when a person—often a child—tells you about harm that has happened, is currently happening, or is likely to happen to a child. These disclosures may be direct or indirect, and they often begin with statements such as:

- "I think I saw..."
- "Somebody told me that..."
- "I just thought you should know..."
- "I'm not sure what I want you to do, but..."

All disclosures must be taken seriously, documented accurately, and acted upon in line with legislative and service requirements.

### What is a suspicion of harm?

A suspicion of harm arises when there are reasonable grounds to believe that a child has been harmed, is currently at risk of harm, or is in an unsafe environment. This includes situations where a child is at significant risk, even if no disclosure has been made.

While some concerns may not meet the threshold for mandatory reporting, staff should still support families by referring them to appropriate support services, such as Family and Child Connect, with the family's consent.

Staff, volunteers, and supervisors may form a suspicion of harm if:

- A child states they have been harmed.
- Another person—such as a child, parent, or staff member—discloses that harm has occurred or may occur.
- A child says someone they know has been harmed (which may refer to themselves).
- There are significant and unexplained changes in a child's behaviour, or the presence of suspicious or unexplained injuries.
- They witness an incident of harm occurring.

## MANAGING AND RECORDING A DISCLOSURE OF HARM

If the Approved Provider, Nominated Supervisor, or educators have concerns about a child's safety, they must respond with care, professionalism, and in accordance with legal and service obligations.

Educators will:

- Find a private and safe place to talk
- Remain calm, attentive, and non-judgemental
- Encourage the person (including a child) to speak in their own words
- Take all disclosures seriously
- Involve children in decision-making where appropriate
- Ask only open-ended questions necessary to act protectively, avoiding leading or suggestive questions that could influence responses or compromise investigations
- Acknowledge the courage it takes to disclose and reassure the person they've done the right thing
- Refrain from investigating or mediating the matter themselves
- Record their own observations and accurately document any conversations with parents (e.g. where a parent explains a visible mark)

Educators must document details as soon as possible to ensure accuracy, including:

- Time, date, location, and names of all present
- A full account of the suspected abuse or harm
- Direct quotes using "I said", "they said" statements
- Questions asked by educators
- Any educator responses or comments made
- Actions taken following the disclosure
- Confirmation that records are stored and managed in line with the service's Privacy and Confidentiality Policy
- Adherence to the service's reporting procedures

## MANAGING AND RECORDING A SUSPICION OF HARM

At Star of the Sea OSHC, the Approved Provider, Nominated Supervisor, educators, and volunteers have a shared responsibility to remain vigilant and responsive to any concerns about a child's safety.

All staff will:

- Stay alert to early warning signs or indicators of harm or neglect.
- Monitor and take note of changes in a child's behaviour, language, emotions, or ideas that may signal concern.
- Record observations factually, without judgement, and ensure these are managed in accordance with the Service's *Privacy and Confidentiality Policy*.
- Reassure children they are safe to speak and that they will be listened to and believed.
- Follow the service's reporting procedures without delay.

## MAKING A REPORT

Any disclosure or reasonable suspicion of significant harm must be reported as soon as possible—preferably on the same day—and **no later than 24 hours** after becoming aware of it. The following steps must be followed:

1. **Consider if the matter should be reported to the Police**
  - Dial 000 immediately if a child is in immediate danger and intervene only if it is safe to do so.
  - Contact the Police if the child may be the victim of a criminal offence (e.g., sexual abuse, physical assault, or significant harm outside the family environment).
  - Seek Police guidance on who will inform the child's parent/guardian and who will provide ongoing support.
2. **Consider if the matter should be reported to the Department for Child Protection (DCP)**
  - Call 131 478 (available 24/7) to make a report. When unsure, staff should contact the hotline for advice. Less urgent concerns may be submitted online (refer to DCP guidelines).
  - Reports should be made with the support of the Nominated Supervisor. If the Nominated Supervisor is unwilling or unable to proceed, employees and volunteers are obligated to report.
  - Clarify with the DCP who will notify the family and coordinate any follow-up support.
3. **Consider whether a referral to family support services is appropriate**
  - When concerns do not meet the threshold for mandatory reporting but still raise welfare issues, staff will seek family consent to connect them with relevant support services.
  - Support and early intervention play a vital role in protecting children. Further information can be found via the DCP's family support resources.
4. **Consider if the Early Childhood Education and Care (ECEC) Regulatory Authority must be notified**
  - Any incident, suspected or confirmed, involving physical or sexual abuse that occurs at the service must be reported to the ECEC Regulatory Authority.
  - This ensures regulatory compliance and transparency in managing the safety and wellbeing of all children in our care.

## ALLEGATIONS AGAINST SERVICE PERSONNEL

If allegations of harm are made against the Approved Provider, Nominated Supervisor, employees, or volunteers, the same reporting procedures will apply. In such cases, the Nominated Supervisor will:

- Complete an Incident, Injury, Trauma, and Illness Record and notify the Regulatory Authority within 24 hours of the report being made.
- Provide appropriate support to any employee or volunteer who is the subject of an allegation.
- Ensure the confidentiality and protection of the individual's identity in the case of unsubstantiated complaints.
- Review the individual's duties. If the person continues to have contact with children, ensure they are closely and appropriately supervised at all times.
- Seek legal advice regarding any potential restrictions on the person's duties if necessary.

## CONFIDENTIALITY

All reports must remain strictly confidential during the investigation process.

Employees and volunteers must not discuss the matter with anyone not directly involved or notify the person who is the subject of the allegation. This is essential to preserve the integrity of the investigation and to avoid compromising evidence.

## SAFEGUARD FOR REPORTERS

Reports made in good faith to the Department for Child Protection or Police are protected under the *Children and Young People (Safety) Act 2017*. When a report is made in good faith:

- It does not breach confidentiality or professional standards.
- The reporter is protected from civil or criminal liability.
- The identity of the reporter is protected, unless a court determines that disclosure is necessary due to the critical nature of the evidence.

## SUPPORT AFTER DISCLOSURE

The Nominated Supervisor will assist all parties affected by a disclosure of harm by facilitating access to appropriate support and counselling services, ensuring the wellbeing of children, families, and staff remains a priority.

## PROCEDURES FOR MANAGING BREACHES

All employees and volunteers working with children have a duty of care to uphold the safety and wellbeing of all children. A breach of this duty occurs when a person:

- Acts in a way that a reasonable person would not in similar circumstances
- Fails to take actions that a reasonable person would in the same situation
- Acts (or fails to act) in a manner that causes harm to someone owed a duty of care

As part of our Child Protection Risk Management Strategy, a breach includes any action or inaction by an employee, volunteer, or child that does not align with one or more of the Strategy's eight core components.

Reports of breaches should be made to the Nominated Supervisor, who will investigate the matter fairly, impartially, and supportively in accordance with our Grievance Policy and Procedure.

During an investigation:

- All involved parties will have the opportunity to share their version of events
- Confidentiality will be maintained throughout the process
- A suitable outcome will be determined
- A clear, written statement (via letter, email, or SMS) outlining the outcome will be provided to those affected
- Records will be kept documenting all versions and outcomes of the incident

Possible outcomes, depending on the severity and nature of the breach, may include:

- Reinforcement of relevant Strategy components (e.g., the Code of Conduct)
- Increased supervision measures
- Targeted professional development or training

- Mediation between parties involved (if appropriate)
- Disciplinary action, where necessary
- Review and revision of existing policies and procedures
- Termination of employment (in cases of serious breach)

## Risk Management Plan for High-Risk Activities and Special Events

To protect children from potential harm, the Nominated Supervisor and educators will assess and manage risks associated with high-risk activities and special events. These may include:

- Water-based activities
- Large-scale events (e.g., concerts, information days)
- Activities involving external visitors
- Excursions
- Playground upgrades
- Use of potentially hazardous equipment

### Steps in the risk management process:

1. Identify all elements of the activity (e.g., objectives, venue, participants, transport, supervision ratios, toileting procedures, photography, medical needs, visitor protocols, physical environment)
2. Identify potential risks associated with each element
3. Analyse the likelihood and impact of these risks
4. Evaluate the risk level (low, moderate, high, extreme)
5. Implement controls to eliminate or minimise identified risks
6. Review the activity post-event to assess outcomes and make improvements where needed

## STRATEGIES FOR COMMUNICATION AND SUPPORT

To ensure that all families, employees, volunteers, and children are aware of our Child Protection Risk Management Strategy, the Nominated Supervisor will implement the following actions:

- Inform families through newsletters, emails, and information sessions about the purpose and key components of our Risk Management Strategy. Families will be advised where to access the Child Protection Policy and Risk Management Strategy, and encouraged to provide feedback.
- Provide written information on the Risk Management Strategy at the time of enrolment and orientation, and include this information in the Parent Handbook.
- Embed regular discussion of the purpose and components of the Risk Management Strategy in staff meetings and include it in the Staff Handbook.
- Support educators to speak with children about the Strategy in age-appropriate ways and to pass on any feedback to the Nominated Supervisor.
- Display visual prompts, such as posters about child protection and creating safe, supportive environments, throughout the service.
- Incorporate child protection and risk management into staff performance development and training plans to ensure ongoing professional growth and understanding.
- Ensure educators deliver learning about child protection as part of the Curriculum, helping children understand how to stay safe and what to do if they feel unsafe.
- Provide access to relevant resources for families and staff to support awareness, education, and best practice in child protection.

## ACKNOWLEDGEMENT AND APPROVAL

This policy has been developed in consultation with staff, students, and the broader school community and was approved in \_\_\_\_\_

## REVISION RECORD

Implemented	November 2024
Ratified by School Board	
Last Reviewed	11 <sup>th</sup> June 2025
Next Review	June 2026