



# Child Safe Program (New Policy Format)

## Child Safe Code of Conduct Policy and Procedures

### Introduction

Lutheran Education SA, NT & WA (LESNW) is deeply committed to creating a safe and nurturing environment for all children and young people. Recognizing children and young people as precious gifts from God, our schools emphasize the importance of embedding child safety into their core values and daily practices.

Our approach to child safety is guided by the National Child Safe Principles, ensuring that every education setting is a secure place where students can thrive. By fostering warm, caring relationships and implementing comprehensive child safe policies and procedures, LESNW strives to support the growth and flourishing of each unique student.

St Michael's is a Lutheran Independent Co-educational School. St Michael's is deeply committed to creating a safe environment for all children and young people.

St Michael's Lutheran School Board has approved the Child Safe Code of Conduct.

### Statement of Commitment to Child Safety

In the Lutheran learning communities the gospel is to "inform all programs, relationships and activities" (LCA and Its School statement). The love of God in Jesus Christ is to govern all that is done, in response to this love, people in the school community are directed to their fellow human beings. Where they love others, they love him. Christ's promise is that whatever is done for others is

done for him. Informed and transformed by God's creative, redemptive and sanctifying love, God's people are concerned with the total needs of their fellow human beings.

The Child Safe Program in place at each learning community defines power as the capacity to set and care for boundaries. Boundaries are the structures which support human development within community; boundaries may be personal, communal, spiritual, psychological or physical. In Christ, there is an empowerment by the gospel to recognize boundaries and prevent their destructive crossing and to care for those who have been violated. Our responsibility of leadership is to care for professional boundaries through the establishment of structures that protect them. Structures provide for support, examination, and action to ensure that leaders, staff and students act according to boundaries that help, protect and uphold the dignity, worth and safety of each individual. (Valuing Safe Communities: Statement of values)

All children and young people who come to the Learning Community have a right to feel and be safe. We are committed to the safety and wellbeing of all children and young people. We are committed to providing a child safe and child friendly environment, where children and young people are safe and feel safe, and are able to actively participate in decisions that affect their lives.

We have a zero tolerance for harm to children and young people and are committed to acting in students' best interests and keeping them safe from harm.

The Learning Community regards its child safety responsibilities with the utmost importance and is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations and maintaining a child safe culture.

Each member of the Learning Community has a responsibility to understand the important and specific role that they play individually, and collectively, to ensure that the wellbeing and safety of all students is at the forefront of all that they do, and every decision that they make.

## **Purpose**

This Policy and its Procedures outline:

- expected standards of behaviour, relevant to child safety, towards students for all adults in all School environments; and
- the School's expectations for compliance.

It helps to protect students from harm, reduce opportunities for harm to occur, and promote child safety in the School environment.

It also provides guidance on how to best support students and how to avoid or better manage difficult situations.

We also have a **Staff and Student Professional Boundaries Policy and Procedures** that provides detailed guidance for Staff, Volunteers and Contractors, no matter their age, on how to maintain professional boundaries with students.

## Scope

The Child Safe Code of Conduct applies to all adults in the School community. This means that if you are aged 18 or over and are:

- the Principal
- a Leadership Team member
- a School Board or sub-committee member
- a staff member (including non-teaching Staff and temporary or casual Staff)
- a Volunteer
- a Contractor (including an External Education Provider)
- a teaching student on placement at the School
- a Visitor (including a parent/carer or other adult family member of a student when in a School environment or attending a School event)

this Policy and its Procedures apply to you.

We refer to everyone in this list together as the "School Community".

The Child Safe Code of Conduct applies in all School environments, including physical and online environments, and on-site and off-site School grounds (e.g. camps and excursions, and interstate and overseas travel).

The Child Safe Code of Conduct does not apply to students who are volunteering with, coaching or tutoring younger students at the School. If you are a student, you must instead comply with the Student Code of Conduct and other relevant School policies.

## Policy Statement

### The Child Safe Code of Conduct

1. As an adult member of the School Community, you **must** comply with the following Child Safe Code of Conduct:

**DO:**

- Comply with the School's child safe policies and procedures.
- In relationships with students, maintain professional boundaries that apply to your roles and responsibilities at the School at all times (for example, if you are a staff member, Volunteer or Contractor, you must follow the Staff and Student Professional Boundaries Policy and Procedures).
- Comply with any additional guidelines published by the School with respect to child safe behaviours.
- Take all reasonable steps to protect students from harm.
- Provide supervision for students that is appropriate for their age and developmental stage.
- Treat all students with respect, regardless of race, gender identity, sexual orientation, language, religion, political views, culture, disability, or other status.
- Actively encourage the participation and empowerment of all students, including student with disability, culturally linguistically and culturally diverse students, Aboriginal and Torres Strait Islander students and students with other vulnerabilities, by listening to their ideas, values and contributions.
- Intervene when students are engaging in inappropriate, humiliating, vilifying or bullying behaviour towards others.
- Interact with students in an open and transparent way.
- Build trust with students by taking any child safety incidents, concerns and reports made by them seriously.
- Respect the privacy of students and their families and only disclose information to people who have a need to know.
- Where an allegation of harm is made, ensure as quickly as possible that the student involved is safe.
- Call the Police on 000 if you have immediate concerns for a student's safety.
- Report any child safety incidents or concerns to the appropriate external authority (such as CARL or the Police) as your first priority, and then also report the matter internally to the Principal or a Child Safety Contact Officer.
- Report any breaches of this Child Safe Code of Conduct to an appropriate external authority (such as CARL or the Police) where required, as your first priority, and then report the breach to the Principal or a Child Safety Contact Officer.

## DO NOT:

- Engage in, or ignore others engaging in, any form of inappropriate behaviour towards students or expose students to behaviour that has the potential to cause harm (including physical, psychological or emotional harm).
- Engage prejudicial or oppressive behaviour, or use inappropriate language with students.
- Discriminate against any student on the basis of characteristics that are protected in anti-discrimination legislation or express personal views that support or promote such discrimination.
- Engage in discussions with, or in the presence of students that could be construed as inappropriate (for example, asking questions of a personal nature or discussing illicit matters such as sex, drugs or alcohol other than in an educational context).
- Engage in any form of sexual conduct with a student including any form of grooming behaviour, making sexually suggestive comments and sharing sexually suggestive material.
- Engage in inappropriate or unnecessary physical conduct or behaviours, including doing things of a personal nature that a student can do for themselves, such as toileting or changing clothes.
- Engage in any form of physical violence towards a student including inappropriately rough physical play.
- Use mechanical or physical force to punish or discipline a student (other than as outlined in the Restraint of Students policy).
- Engage in inappropriate supervision in changerooms, bathrooms and accommodation (for example, on camps). In particular, male adults must not enter female changerooms, bathrooms or accommodation and female adults must not enter male changerooms, bathrooms or accommodation, except in an emergency.
- Initiate or develop a relationship with any student that has, or can be misinterpreted as having, any basis other than a professional basis (for more information, refer to the **Staff and Student Professional Boundaries Policy and Procedures**).
- Initiate or develop a 'special' relationship with a students that could be seen as favouritism (for example, the offering of gifts or special treatment for specific students).
- Engage in private meetings or activities with a student (other than a student who is your own child):
  - without the School's and/or the students' parents/carers' knowledge and approval; or
  - when there is no other adult present

(for more information, refer to the **Staff and Student Professional Boundaries Policy and Procedures**).

- Engage in personal communications with a student using electronic or digital media through any medium (for more information, refer to the Staff and Student Professional Boundaries Policy and Procedures).
- Take or publish (including online) photos, video and/or audio recordings of a student without School and/or parent/carer consent.
- Post identifying information about a student online unless it is necessary for the School's activities and with consent from the student and/or their parents/carers. Identifying information includes things such as the student's full name, age, email address, telephone number, residence, school, or details of a club or group they may attend.

2. Certain members of the School Community (for example, staff members working as psychologists at the School) may have other professional or occupational codes of conduct that regulate their profession or occupation. If this applies to you, you **must also** comply with these codes of conduct. If you consider that there is a conflict between your professional or occupational code of conduct and the Child Safe Code of Conduct in a particular matter, you **must** follow the **Procedures** below.

## **Agreement to the Child Safe Code of Conduct**

1. If you are a staff member or a Direct Contact or Regular Volunteer, you **must** acknowledge in writing or electronically/online that you have read, understood and agree to adhere to the Child Safe Code of Conduct prior to commencing work at School.

2. The Child Safe Code of Conduct forms part of the contract between the School and any Direct Contact and Regular Contractors. Therefore, if you are a Direct Contact or Regular Contractor, you are deemed to have agreed to adhere to the Child Safe Code of Conduct on signing the contract or on commencing work at the School.

3. If you are a parent/carer, the School provides you with a copy of the Child Safe Code of Conduct on enrolment, and you **must** acknowledge in writing or electronically/online that you have read, understood and agree to adhere to it.

## **Breaches of the Child Safe Code of Conduct**

1. The School considers any breach of the Child Safe Code of Conduct to be a child safety incident. As a result, if you are a staff member or a Direct Contact or Regular Volunteer/Contractor, you **must**:

- report any breach that causes you to suspect harm or risk of harm to a child or young person directly to the Child Abuse Report Line (CARL), following the [Responding and Reporting Obligations \(Child Safe\) Policy and Procedures](#)
- report any breach that causes you to suspect the sexual abuse of a child or young person directly to the Police, following the [Responding and Reporting Obligations \(Child Safe\) Policy and Procedures](#)
- after you have made any required external reports, report all breaches of the Child Safe Code of Conduct internally to the School, following the **Procedures** set out below.

2. If, in good faith, you make an internal report alleging a breach of the Child Safe Code of Conduct, the School will protect you from victimisation or other adverse consequences.

3. The School will apply appropriate consequences to School Community members who breach the Child Safe Code of Conduct, as set out in **Breach** below.

## Procedures

### Agreement to Adhere to the Child Safe Code of Conduct

All Staff and Direct Contact and Regular Volunteers must sign an agreement to adhere to the Child Safe Code of Conduct prior to commencing work at the **School**.

### Other Professional or Occupational Codes of Conduct

If you must comply with a professional or occupational code of conduct and you consider that there is a conflict between that code of conduct and the Child Safe Code of Conduct in a particular matter, you **must**:

- seek advice from your professional or occupational regulatory body and/or a Child Safety Contact Officer; and
- advise the Principal of your proposed course of action.

### Report Any Concerns

*If you are concerned that a child, young person or student aged 18 or over is in immediate danger, call the Police on 000.*

***Any person, including all Staff, Volunteers, Contractors, parents/carers and students, can at any time contact CARL if they suspect that a child or young person (aged under 18) is being or has been harmed or is at risk of harm.***

You can contact CARL on 13 14 78 or [online](#) (if you are registered for online reporting). CARL is open 24 hours a day, seven days a week.

If you need support when making a report, or have questions regarding child safety, contact a Child Safety Contact Officer.

## **Staff, Volunteers and Contractors**

If you are a staff member, Volunteer or Contractor and you witness or suspect a breach of the Child Safe Code of Conduct, after first making any required reports to CARL and/or to Police, report the breach internally to:

- a Child Safety Contact Officer
- the Principal; or
- if the breach involves the Principal, to the Chair of the Board by emailing [sfairley@stmichaels.sa.edu.au](mailto:sfairley@stmichaels.sa.edu.au)

as soon as possible.

A breach of the Child Safe Code of Conduct could amount to harm to a child, young person or student aged 18 or over. For information about how to identify key indicators of harm, refer to **Definitions and Key Indicators of Harm**.

Reporting internally does not replace other legal and policy obligations that you may have. In addition to the above, you must also follow all responding and reporting obligations that apply to you.

Depending on the circumstances, these obligations may include:

- reporting to CARL
- reporting to the Police
- taking steps to protect students from future risks of harm, where those steps are within your power or responsibilities to take (to meet your duty to protect obligations)
- reporting teacher misconduct to the Teachers Registration Board
- providing information to other external agencies.

## **Students**

Students who are the victim of or who witness or suspect a breach of the Child Safe Code of Conduct can contact CARL and/or:

- disclose this to a School Child Safety Contact Officer
- disclose this to any other staff member, Volunteer or Contractor. This might be done:
  - verbally
  - in writing
  - through electronic means (such as email)
  - indirectly (such as in written assignments, in artworks or in any other way)
- disclose this anonymously, using the School's anonymous student mail boxes, which is located near the entrance of each Learning Community
- contact Kids Helpline.

For more information, students can refer to the child-friendly version of the **Child Safe Policy**, available [on the school website](#), which explains these different pathways.

## **Parents/carers, family members or other School Community members**

Parents/carers, family members and other community members who witness or suspect a breach of the Child Safe Code of Conduct can contact CARL and/or:

- the Principal, who is the School's Senior Child Safety Contact Officer, by phoning 0417 646 011 or emailing [ttaylor@stmichaels.sa.edu.au](mailto:ttaylor@stmichaels.sa.edu.au)
- if the concern relates to the Principal, the Chair of the Board by emailing [sfairley@stmichaels.sa.edu.au](mailto:sfairley@stmichaels.sa.edu.au).

Communications will be treated confidentially on a 'need to know' basis.

## **Implementation**

The Child Safe Code of Conduct is published on our public website.

The Child Safe Code of Conduct is made available to employed staff members through the School's School Server. The School provides a copy of the Child Safe Code of Conduct to all Staff, relevant Volunteers and relevant Contractors at their induction, or otherwise prior to them commencing work at the School.

Training about the Child Safe Code of Conduct is included in induction and annual refresher training for employed staff members, as well as relevant Volunteers and Contractors.

Employed staff members, relevant Volunteers and relevant Contractors, and parents/carers sign an agreement to adhere to the Child Safe Code of Conduct as set out in this Policy and its Procedures.

The School has developed, in consultation with its students, (Child Friendly) Child Safe Code of Conduct, a child-friendly version of the Child Safe Code of Conduct that the School provides to all students.

## Breach

If you are a staff member, Volunteer or Contractor and you breach this Policy and its Procedures, the School can investigate your conduct. You could face disciplinary action, such as (depending on the severity of the breach):

- attending remedial education
- attending counselling
- increased supervision
- the restriction of duties
- appointment to an alternate role
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

You could also face civil or criminal penalties.

If you are another member of the School Community and you breach the Child Safe Code of Conduct, the School will take appropriate action. This could include:

- making a report to Department for Child Protection's or the Police if your conduct meets the required threshold for reporting
- if you are aged 16 or over and are not a student at the School, issuing a Barring Notice against you in appropriate cases.

## Definitions

Definitions of particular terms used in this Policy and its Procedures can be found in **Child Safe Program Definitions** and **Definitions and Key Indicators of Harm**.

## Sources Of Obligation

- Children and Young People (Safety) Act 2017 (SA), section 114
- National Principles for Child Safe Organisations, Principle 1

## Related Policies

- [Child Safe Policy](#)
- [Staff and Student Professional Boundaries Policy and Procedures](#)
- [Student Child Safe Code of Conduct Policy and Procedures](#)
- [Responding and Reporting Obligations \(Child Safe\) Policy and Procedures](#)
- [Sharing Information About Students' Safety, Welfare or Wellbeing Policies and Procedures](#)
- [Working with Children Checks Policy and Procedures](#)
- [WWCC Procedures for Staff](#)
- [Risk Management \(Child Safe\) Policy and Procedures](#)
- [Compliance, Review and Improvement \(Child Safe\) Policies and Procedures](#)
- Complaints Handling Policy

## Related Documents

- **Complaints Handling Policy**
- Procedures for Managing Child Safety Incidents or Concerns Involving the **School** or its Staff Members (Summary)
- **Responding to an Incident, Disclosure or Suspicion of Harm to a Child or Young Person Template**
- child-friendly version of the Child Safe student Code of Conduct Policy and Procedures
- child-friendly version of the Child Safe Policy

## References

- Department for Education, [Protective Practices for Staff in their interactions with children and young people: Guidelines for staff working or volunteering in education and care settings 2017](#)

## Policy Administration

Updated May 2026