



EDMUND RICE EDUCATION
AUSTRALIA

Edmund Rice
Education Australia

Child Safe Code of Conduct

Section 3 of the EREA Code of Conduct

January 2020

The **EREA Child Safe Code of Conduct** is referenced in and supports the EREA school Child Protection programs.

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3.0 Child Safe Code of Conduct

3.1 Introduction

Edmund Rice Education Australia's vision for ensuring Schools are safe and supportive environments is outlined in the Edmund Rice Education Australia Commitment Statement to Child Safety. All Workers have a responsibility to understand the important and specific role they play individually and collectively to ensure that the wellbeing and safety of all Students is at the forefront of all they do and every decision they make.

This Child Safe Code of Conduct provides a high-level statement of Professional Boundaries, ethical behaviour and acceptable and unacceptable relationships. It will assist Edmund Rice Education Australia to meet its obligations to have such a defined code as required by various States' Child Protection Legislation. More than this, it reinforces Edmund Rice Education Australia's commitment to providing safe and supportive environments where all children and young people entrusted to our care are affirmed in their dignity and worth as a person. Children and young people in the Edmund Rice Education Australia community are empowered to have a voice which includes listening and responding to their views and concerns.

This Child Safe Code of Conduct applies to Workers. To the extent reasonably required to protect Students from Harm, there is an expectation that the Child Safe Code of Conduct will apply to the conduct of Students, parents/guardians and visitors.

3.2 Interactions with Students

Workers must treat all Students with respect. Workers hold a unique position of influence, authority, trust and power in relation to Students. As such, it is their duty to establish and maintain Professional Boundaries with Students at all times.

Workers must:

- abide by Professional Boundaries, acknowledging that interactions with Students by their very nature are open to scrutiny. Workers should avoid placing themselves or a Student in a compromising position and avoid actual and/or perceived breaches of the Code.
- be familiar with, apply and act in accordance with the *School/College*'s Child Protection Program.

Workers must be vigilant and proactive taking all reasonable steps to protect children from Harm (refer to the Child Abuse Definitions in the *School/College*'s Child Protection Program).

3.3 Professional Boundaries

Workers must be conscious that their position places significant obligations on them including a requirement to maintain Professional Boundaries. Interactions with Students can extend beyond the School setting, including outside of School hours, outside of School grounds and by any medium of Technology (including social media).

Workers must ensure that social interactions with Students do not give grounds for allegations against them. Workers must not initiate or develop a relationship with any Student that is or can be perceived or misinterpreted as having a personal rather than a professional element.

Professional Boundaries between a Worker and a Student may be compromised by Workers:

- Treating a Student with favouritism, or perceived favouritism (ie. by the offering of gifts or special treatment for specific Students);
- Attending parties or socialising with Students outside of organised School events (without parent/guardian permission);
- Sharing personal details about their private life with Students; or
- Meeting with Students outside of School hours without permission from the School.

Further to this, Workers must:

- Not engage in open discussions of an adult nature in the presence of, or which may be overheard by, Students.
- Avoid, as far as possible, situations where they are alone with a Student. In such situations Workers must adhere to the prescribed School Policy with specific reference to working alone with a Student.
- Endeavour not to drive a Student in their car unless they have parental permission and do so in accordance with School Policies
- Only engage in paid tutoring or coaching of Students outside of School hours in accordance with School Policies.

Workers must be aware that the Code applies regardless of:

- The location of where an interaction occurs, whether during or outside School grounds or during or outside School hours.
- A Student's age.
- A Student's consent.
- The consent of parents/guardians and families.
- Circumstances in which a Student initiates an interaction or relationship between the Worker and the Student.

3.4 Grooming

Workers must not engage in Grooming or Grooming Behaviours (refer to the definition of Grooming in the *School/College*'s Child Protection Program). Sexual interaction, including Sexual Misconduct and Sexual Offences, between Workers and Students is never appropriate and is always unlawful, whether consensual, non- consensual or condoned by parents/guardians.

Workers should be aware that where a relationship develops with an ex-Student, their employer is entitled to consider whether the Worker's actions suggest/suggested an abuse of their position as a staff member including if Professional Boundaries between the Worker and the Student were infringed. A judgment that abuse of their position has occurred would constitute Serious Misconduct and may result in the Worker's employment being terminated, together with mandated reporting to appropriate child protection agencies.

3.5 Personal Relationships with Students

Where personal relationships with Students such as family relationships and close friendship networks may exist, questions of Conflict of Interest may arise and Professional Boundaries may be tested.

Where such a situation may arise, a Worker is expected to:

- Be appropriately diligent in developing and maintaining Professional Boundaries
- Take steps to ensure any potential Conflict of Interest is avoided
- Comply with the School's Policy to make relevant disclosures to the Child Safety Officer (or equivalent) and/or the Principal.

3.6 Behaviour Education

Student behaviour education practices in Edmund Rice Education Australia Schools aim to facilitate the development and experience of responsible self-discipline amongst Students and to promote the well-being, safety and effective management of the School community.

Workers should use positive and affirming language towards Students, and create open, safe and supportive environments where Students are encouraged to interact, socialise and "have a say". Workers must develop and use effective, consistent and appropriate behaviour education strategies in day to day interactions with Students. These strategies should include clear, consistent and published methods of dealing with inappropriate behaviours. These strategies should reflect and apply the values of Edmund Rice Education Australia and be developed in accordance with relevant Policies and Disability Standards, where applicable.

Students who display recurring challenging behaviours, particularly unsafe behaviours, should be referred to the appropriate person (consistent with the *School/College*'s Student Management Policy).

Workers should exercise prudent judgement and intervene when Students are engaging in bullying behaviour towards others or acting in a humiliating or vilifying way (consistent with a School's Student Management Policy).

The use of any form of child abuse, corporal punishment or other degrading punishment is explicitly forbidden.

3.7 Physical Contact with Students General

Workers are required to develop and exercise prudent judgment and sensitivity regarding appropriate physical interactions with Students.

Edmund Rice Education Australia expects that when physical contact with a Student is necessary within the teaching/learning experience, Workers must exercise caution to ensure that the contact is appropriate and acceptable for the duty to be performed. Examples of situations where physical contact with a Student may be necessary, beneficial and/or supportive include:

- Assisting Students with special needs, for example to allow a Student to engage with a teaching/learning experience or the curriculum in general in accordance with School Policies and Disability Standards.
- Assessing a Student who is injured or ill. One should advise the Student of what they intend to do and, where possible, seek the Student's consent and have a colleague present.
- Teaching sport, music and other activities where physical handling of a Student is required to demonstrate a particular action or skill.
- Comforting in a pastoral manner an upset Student.
- Guiding a Student in a non-threatening manner.
- Using a gentle tap on a Student's shoulder to gain his/her attention after verbal requests were unsuccessful.
- Restraining a Student when the Student, other Students, Workers or others are being harmed or are in imminent danger of being harmed.
- A congratulatory handshake or pat on the back.
- Edmund Rice Education Australia expects that any physical contact as referred to in the above examples:
 - Is only acceptable if the contact is reasonable for the purpose of the management or care of the Student.
 - Must be appropriate given the age, maturity, health or other characteristics of the Student.
 - Should be consistent with any individual behaviour education plan in place for that Student.

3.8 Physical Contact with Students: Risk and Response

As any physical intervention involves some risk of injury, Workers must weigh this risk against the risks involved in failing to physically intervene when it may be warranted. Intervention may be warranted when a Student, other Students, Workers or others are being harmed or are in imminent danger of being harmed.

Such interventions should be employed as measures of last resort required to ensure safety and protection (ie. physical interventions, including physical restraints, removals or escorts) or to contain and/or control the behaviour of Students in circumstances such as:

- A Student attacking a Worker or third party.
- A Student attacking another Student.
- Students physically fighting.
- A Student causing, or at risk of causing, injury to themselves or others.
- A Student misusing dangerous materials, substances or objects where it is likely that this will cause imminent harm.
- A Student placing themselves (deliberately or inadvertently) in a dangerous situation.
- A Student being attacked by a third party.

All Workers using physical interventions are responsible and accountable for the manner in which they exercise that authority. Workers must report all physical interventions to the Principal or Deputy Principal. Principals would then report the same to the Regional Director.

NB. The same physical contact guidelines apply during off-campus excursions and camps. School Excursion Policies may reference additional guidelines (ie. in the case of dormitory supervision).

3.9 Use of Technology

Workers are expected to adhere to the following guidelines regarding electronic communications with Students (consistent with any School Acceptable Usage and Social Media Policies):

- All use of Technology should be for educational purposes or for the organisation of co-curricular events;
- All email communication between Workers and Students should be via the School email system and reflect the Professional Boundaries between Worker and Student;
- All online contact between Workers and Students should be via School systems and reflect the Professional Boundaries between Workers and Student;
- Workers should ordinarily not give out their personal telephone numbers to Students. In cases where this is necessary, contact by personal telephone numbers must reflect the Professional Boundaries between Worker and Student;
- Workers should not exchange personal social media or instant messenger account details with Students or accept friend/follow requests or engage in any contact via social media or instant messaging;
- Workers should not exchange personal pictures with Students;
- Workers should not take or publish (including online) photos, movies or recordings of a Student without School authority; and

- Any Student personal contact numbers or other personal contact details made available to the School should only be used for School communications.

3.10 Inclusivity Principle

Workers are expected to promote the safety, participation and empowerment of all Students. Particularly, Workers must:

- Promote the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander Students
- Promote the culture safety, participation and empowerment of Students with culturally and/or linguistically diverse backgrounds
- Promote the safety, participation and empowerment of Students with a disability
- Workers should not express personal views or discriminate against any Student based on culture, race, ethnicity, disability or sexuality.

3.11 Reporting

Workers with concerns about conduct which falls below the standards expected by this Child Safe Code of Conduct might refer to:

- The definition of Harm; and
- The Definitions and Key Risk Indicators within the School's Child Protection Program.

Workers must report concerns about child safety, including actual or perceived breaches of this Child Safe Code of Conduct, to one of the School's Child Safety Officers (or equivalent). This may include any concerns that Grooming, Sexual Misconduct or a Sexual Offence has been committed against a Student or that a Student has been the subject of Harm. Workers must ensure their legal and mandatory reporting obligations are met, consistent with the School's Procedures for Responding to and Reporting Allegations of Child Abuse within the School's Child Protection Program.

Where an allegation of Harm is made, a Worker will ensure as quickly as possible that the Student involved is safe. The police should be called (000) if there are immediate concerns for the Student's safety.

Code of Conduct Definitions

Child Protection Legislation means child protection legislation:

- Enacted in each State and Territory of Australia;
- As it is in force and as it may be amended by the relevant legislature from time to time; and
- Which bestows obligation and responsibility on Edmund Rice Education Australia and its Schools;
- And is to be applied throughout the Code such that a Worker's obligations are in respect of the Child Protection Legislation applying in the jurisdiction in which the Worker engages with Edmund Rice Education Australia or its Schools.

Child Abuse may take the form of physical abuse, sexual abuse, emotional abuse and/or neglect. (See ***Harm Caused to a Student***)

Child Protection Policy(ies) means the child protection policies:

- Encompassing the relevant Child Protection Legislation;
- Developed and enacted by Edmund Rice Education Australia;
- Developed and enacted by Schools;
- As it is in force and as it may be amended by Edmund Rice Education Australia or its Schools from time to time;
- And is to be applied throughout the Code such that a Worker's obligations are in respect of the Child Protection Policy applying in the jurisdiction in which the Worker engages with Edmund Rice Education Australia or its Schools.

Child Safety Officer(s)* means the person or persons a School has identified as having responsibilities as a Child Safety Officer and who is identified within the relevant Child Protection Program.

*(NOTE: Known as Student Protection Contacts in Queensland).

Conflict(s) of Interest refers to a situation where a conflict arises for an individual between two competing interests. These are often, but not exclusively, interests of public duty versus private interests. A Conflict of Interest can be actual, potential or perceived.

Corporal Punishment involves any punishment in which physical force is used and intended to cause some degree of pain or discomfort, however light; typically involving hitting the child with the hand or with an implement ; and can also include, for example, forcing child to stay in an uncomfortable position. It does not include the use of reasonable physical restraint to protect a child or others from harm. **Degrading Punishment** refers to any punishment which is incompatible with respect to human dignity, including corporal punishment and non-physical punishment which belittles, humiliates, denigrates, scapegoats, threatens, scares or ridicules the child.

The following list provides Workers with a guide to behaviours that are unacceptable as they are contrary to good professional practice and Edmund Rice Education Australia values and may result in emotional distress or psychological Harm to a Student. Such behaviours include but are not limited to:

- Using an object, such as a ruler, book or whiteboard marker to gain a Student's attention in a hostile or inappropriate physical manner.
- Restraining/holding a Student for any purpose other than when a Student's actions cause or threaten to cause imminent harm to themselves or others.
- Hitting or kicking a Student.
- Pushing, pulling, shoving, grabbing, pinching or poking a Student, including by their clothing.
- Shaking or forcibly handling a Student.
- Targeted and sustained criticism, belittling or teasing.
- Intimidating a Student.
- Swearing at a Student.
- Using sarcasm to humiliate.
- Using names or nicknames to undermine the self-confidence of a Student.
- Locking a Student in a confined space or forcing a child to stay in an uncomfortable position.
- Refusing biological needs as a means of punishment.
- Criticising a Student rather than the Student's actions.
- Practices which instil fear or using fear as a means of controlling a Student.
- Practices which cause a Student to feel alienated.

Disability Standards means the Disability Standards for Education 2005 formulated under the Disability Discrimination Act 1992 (Cth) and which came into effect in August 2005. The Disability Standards clarify the obligations of Schools and seek to ensure that Students with disability can access and participate in education on the same basis as other Students.

Deputy Principal refers to a person who is employed as a Deputy Principal of a School (or Head of Campus for a Flexible Learning Centre) and who undertakes the roles of a Deputy Principal, including those delegated by the Principal.

Discrimination (direct or indirect) occurs when a person is treated, or is proposed to be treated, less favourably than others because of an attribute protected by law. Attributes protected by law include:

- Sex;
- Relationship or parental status;
- Race;
- Age;
- Impairment or disability;
- Religious or political beliefs;
- Union activities;
- Gender identity;
- Sexuality (including sexual preference, transgender status or homosexuality);
- Lawful sexual activity;
- Pregnancy;
- Breastfeeding; and
- Family or carer's responsibilities.

Duty(ies) Of Care is a duty imposed on Edmund Rice Education Australia and its Schools by common law or by statute, or otherwise a Duty of Care which attaches personally to a Worker.

Edmund Rice Education Australia includes its registered Schools and early learning centres, educational facilities, national and regional offices (and any other associated entities).

Grooming (or Grooming Behaviours), includes actions deliberately taken with the aim of befriending and establishing an emotional connection with a Student, to lower the Student's inhibitions in preparation for sexual activity with the Student. Grooming Behaviours include:

- Persuading a Student or group of Students that they have a 'special' relationship, for example by:
- Spending inappropriate time with a Student;
- Inappropriately giving gifts;
- Inappropriately giving favours to them, but not other Students;
- Inappropriately allowing a Student to overstep the rules;
- Asking the Student to keep this relationship to themselves;
- Testing boundaries, for example by:
- Undressing in front of a Student;

- Encouraging inappropriate physical contact (even where it is not overtly sexual);
- Inappropriately talking about sex;
- ‘Accidental’ intimate touching;
- Inappropriately extending a relationship outside of the School; and
- Inappropriate personal communication (including the use of Technology).

Harm caused to a Student encompasses any definitions set out in Child Protection Legislation and/or Child Protection Policy and includes:

- Child Abuse, as defined within the relevant Child Protection Program.
- Conduct by a Worker as a result of Grooming, Sexual Misconduct, a Sexual Offence or Discrimination.
- Any detrimental effect of a significant nature on the Student’s physical, psychological or emotional wellbeing by any cause, other than confirmed accidental Harm not involving negligence or misconduct.
- Minor Harm that is cumulative in nature that would result in a detrimental effect of a significant nature to the Student if allowed to continue.
- Physical or emotional abuse or neglect or sexual abuse or exploitation or family violence or Student bullying or self-harm.

Harassment is prohibited by federal legislation, and is defined as:

- (a) Harassment in the workplace based on or linked to a person’s disability or the disability of an associate; or
- (b) offensive behaviour based on racial hatred, which is defined as something done in public that offends, insults or humiliates a person or group of people because of their race, colour or national or ethnic origin.

Harassment can be a single incident and can occur even if the behaviour is not intended to offend.

Illegal Drugs means any mind altering or legally controlled substance. This includes any drugs listed in the Drugs Misuse Act 1986 (QLD); Drug Misuse and Trafficking Act 1985 (NSW); Drugs of Dependence Act 1989 (ACT); Drugs, Poisons and Controlled Substances Act 1981 (VIC); Misuse of Drugs Act 2001 (TAS); Controlled Substance Act 1984 (SA); Misuse of Drugs Act 1981 (WA); Misuse of Drugs Act (NT), or similar legislation relevant to any other State in Australia that Edmund Rice Education Australia may operate in, and any drugs listed in the Australian Standards 4308:2008 Procedures for specimen collection and quantitation of drugs of abuse in urine and AS 4760:2006 Procedures for specimen collection and quantitation of drugs in oral fluid (or successor Australian Standards).

Edmund Rice Education Australia may also include drugs other than those listed in Australian Standards, such as those drugs referred to as “designer drugs”, including (but not limited to) synthetic cannabinoids and herbal highs, as well as other synthetic drugs such as opioids, hallucinogens, piperazines, stimulants and sedatives in the definition of “Illegal Drugs”.

Policy(ies) means material developed by Edmund Rice Education Australia and/or its Schools which provide policy statements, procedures and processes to be adhered to by Workers.

Principal refers to a person who has delegated responsibility for the day to day operations of a particular School for which Edmund Rice Education Australia is the governing authority.

Professional Boundaries means parameters that describe the limits of a relationship in circumstances where one person (a Student) entrusts their welfare and safety to another person (a Worker) in circumstances where a power imbalance exists or could reasonably be perceived to exist.

Regional Director(s) refers to a person who is employed by Edmund Rice Education Australia and who undertakes the roles of a Regional Director. Contact details of current Regional Directors are set out in section 5.5.

School(s) means such registered educational entities owned or operated by Edmund Rice Education Australia, which provide educational services to Students within the Edmund Rice Education Australia system (including Youth+, Flexible Learning Centres and IMCH). The Code is intended to cover all authorised activities undertaken by Schools (including but not limited to teaching, sport, excursions, camps, retreats, work experience and billeting) whether the activities are undertaken on designated School property or otherwise.

Serious Misconduct is the following conduct, adapted from the Fair Work Regulations 2009 (Cth) as amended, which may give Edmund Rice Education Australia or its Schools a right to immediately terminate the engagement of a Worker:

Wilful or deliberate behaviour by a Worker that is inconsistent with the continuation of the engagement. Conduct that causes serious and imminent risk to:

- The health and safety of a person (including a Student)
- The reputation, viability or profitability of Edmund Rice Education Australia or its Schools
- The integrity of Technology of Edmund Rice Education Australia or its Schools
- Protection of intellectual property of Edmund Rice Education Australia or its entities.

The Worker, in the course of the Worker’s engagement, engaging in:

- Theft
- Fraud
- Assault
- A Worker being intoxicated by alcohol or under the influence of Illegal Drugs while at Edmund Rice Education Australia, at its Schools or otherwise with a responsibility for Students

- The refusal to carry out a lawful and reasonable instruction that is consistent with the Worker's engagement
- The Worker engaging in Discrimination, Harassment, Sexual Harassment, Workplace Bullying, Grooming, Sexual Misconduct, Sexual Offence, or causing Harm.

This definition of Serious Misconduct does not reduce the concept of Serious Misconduct as it may be defined in any contract or agreement which otherwise applies to the Worker.

Sexual Harassment is any unwanted or unwelcome conduct of a sexual nature, which a reasonable person would find offensive, humiliating or intimidating. A single incident is enough to constitute Sexual Harassment.

Sexual Harassment may be physical, verbal or written and includes:

- Staring or leering;
- Unnecessary familiarity, such as deliberately brushing up against a person or unwelcome touching;
- Suggestive comments or jokes;
- Insults or taunts of a sexual nature;
- Intrusive questions or statements about a person's private life;
- Displaying posters, magazines or screen savers of a sexual nature;
- Sending sexually explicit emails or text messages;
- Inappropriate advances on social networking sites;
- Accessing sexually explicit internet sites;
- Requests for sex or repeated unwanted requests to go out on dates;
- Behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications; and
- Any of the above behaviours or conduct carried out using any Technology, including social media.

Sexual Misconduct includes but is not limited to:

- Crossing Professional Boundaries, for example:
- Inappropriate, overly personal or intimate relationship with, or conduct towards, a Student:
- Sexually explicit comments and other overtly sexual behaviour, for example:

- Sexual exhibitionism;
- Inappropriate conversations of a sexual nature with a Student;
- Unwarranted and inappropriate touching involving a Student;
- Personal correspondence or communications (including through any Technology) with a Student in respect of a Worker's romantic, intimate or sexual feelings for a Student;
- Suggestive remarks or actions of a sexual nature to or within the hearing or presence of a Student;
- Obscene gestures, language, or jokes containing sexual references (whether in person or communicated via any Technology), or deliberately exposing Students to sexual behaviour of others, other than in the case of prescribed curriculum material in which sexual themes are contextual;
- Possession, distribution or display of pornography;
- Encouraging or failing to discourage romantic or inappropriate advances by a Student;
- Any form of Sexual Offence.

NB. Should any Student engage, or attempt to engage, in inappropriate behaviour of a sexual nature with a Worker, then immediate steps must be taken to discourage the Student and the matter should be immediately reported to the Child Safety Officer and/or the Principal.

Sexual Offence means any criminal offence involving a sexual element that is committed against, with or in the presence of a child, including but not limited to:

- Indecent assault;
- Sexual assault and sexual abuse;
- Aggravated sexual assault;
- Sexual intercourse and attempted sexual intercourse;
- Possession/dissemination/production of child pornography or child abuse material;
- Using children to produce pornography;
- Grooming or Grooming Behaviours, including procuring children under the age of 16 years for unlawful sexual activity.

All cases of Sexual Offence, or breaches of Child Protection Policies or Child Protection Legislation, also constitute Serious Misconduct.

Student(s) means any person enrolled as a Student at a School (including Youth+, a Flexible Learning Centre or IMCH) regardless of the age of the Student.

Technology includes, without limiting its ordinary meaning, information and communication technologies (ICT), communication devices, storage devices or applications, encompassing: radio, television, mobile phones, computer (Laptops, Tablets), data storage, printers, faxes and network hardware and software, satellite systems and all other digital communications, as well as the various services and applications associated with them, such as web-based and mobile technologies (ie. text and video messages, email, social media, file sharing, online data storage and videoconferencing).

The Charter means the statement of Touchstones proclaimed on 11 September 2017, for all Edmund Rice Education Australia Schools and educational entities giving ideals authentically linked with the charism of Blessed Edmund Rice and which underpin the ministry of Edmund Rice Education Australia Schools and educational endeavours.

Vexatious Complaints are written or verbal reports of alleged improper conduct made to an authority intending the report to be acted upon, where there is a demonstrated absence of reasonable grounds for suspecting the improper conduct, and the report is made to cause distress, embarrassment or stress.

Worker(s) are persons involved in Edmund Rice Education Australia and its Schools, Youth+, Flexible Learning Centres and IMCH as:

- Full time, part time, casual or fixed term employees;
- Supply, relief, aide, volunteer, placed or work experience teachers;
- Support and administration staff;
- Contractors or sub-contractors;
- Volunteers;
- Members of Boards and Councils; and
- Members of the Board and Council of Edmund Rice Education Australia.

Workplace Bullying is repeated unreasonable behaviour directed towards a person, or a group of persons, that causes a risk to health and safety. Unreasonable behaviour means behaviour that a reasonable person, having regard to the circumstances, may consider unreasonable, for example because the behaviour is victimising, humiliating, undermining or threatening, and may include:

- Putting Workers through "initiation rituals";
- Verbal abuse, threats, sarcasm or other forms of demeaning or intimidating language or communication;
- Constant unwarranted negative criticism or "nit-picking";
- Threatening to take unjustified action against a person unless they comply with unreasonable requests;
- Deliberately isolating a Worker by refusing to talk to or interact with them.
- Reasonable management action carried out in a reasonable manner is not Workplace Bullying.