

The Preamble of the Trustees of Edmund Rice Education Australia enforceable undertakings

In May 2020, The Trustees of EREA (TEREA) entered into enforceable undertakings with the Victorian Registration and Qualifications Authority (VRQA). The VRQA had found TERE A non-compliant with the governance minimum standard applying to its Victorian schools, and the care, safety, and welfare standard, including Ministerial Order 870 Child Safe Standards.

TEREA acknowledges that significant work has been required in order to discharge the enforceable undertakings, and to that end, has endeavoured to improve governance structures and practices, to investigate and reflect on the governance oversights, and to ensure improvements in line-of-sight management of its schools, not just in Victoria, but across all jurisdictions.

TEREA has entered into a special services agreement with the Catholic Education Commission Victoria (CECV) to assist TERE A in meeting the requirements of the enforceable undertakings and improving standards.

A full copy of the enforceable undertakings follows this preamble. TERE A has already been advised by the VRQA that EREA has met the requirements of paragraph 25(1) of the enforceable undertakings as noted below. In summary, the enforceable undertakings have required TERE A to:

1. *Undertake a review of governance of the Victorian schools and develop options for the governance structure which ensures compliance with the governance minimum standard. (ERE A has already satisfied this requirement as advised by VRQA).*

Comment: A proposal to incorporate a new company to govern EREA schools with attendant supports through the instigation of new EREA Board committees, improved resourcing and reporting structures has been accepted by the VRQA, and this aspect of the undertakings has now been satisfied. A new Board will be appointed to the new company.

2. *Provide VRQA with documentation on Constitution and governance charter, delegations, and evidence to the VRQA that the governing body has appropriate oversight of each of the Victorian Schools, as well as providing evidence that appropriate inquiries are being made in relation to the operations of the schools. In addition, members of TERE A undertake the appropriate professional development in relation to Ministerial Order 870, and the requirements for registration of schools as well as schools and persons involved in the schools participate in review and evaluation being conducted by CECV as the review body.*

Comment: Work is well underway in this area.

3. *TEREA (and St Kevin's College) provides copies of policies and procedures in relation to the care, safety and welfare minimum standards, Ministerial Order 870, and a plan to implement the findings of a culture review of the College.*

Comment: Now that the cultural review of St Kevin's College has been completed and shared with the community, and part 1 of these undertakings has been satisfied, TERE A will provide the VRQA with the details required for the remainder of the enforceable undertakings. The move to incorporating a new company together with a new constitution, and delegations and reporting lines is intended to be completed by 31 December 2022.

The Chair of the EREA Board Mrs Bobby Court, has said: "We are determined to implement a program of continuous improvement. That determination will see significant change in our processes, policies, practices, and the very structure of EREA into the future. Our chief

priority must be the safety of young people. Our whole operation must be reflective of that.”

In assisting with the meeting of the enforceable undertakings and in moving to a new governance model, EREA will appoint additional resources to support these changes.

ENFORCEABLE UNDERTAKING

THIS UNDERTAKING IS GIVEN BY:
TRUSTEES OF EDMUND RICE EDUCATION AUSTRALIA
9 The Vacluse
RICHMOND VIC 3121

AND IS ACCEPTED BY:
Lynn Glover, Chief Executive Officer (Director) of the
VICTORIAN REGISTRATION AND QUALIFICATIONS AUTHORITY
Level 4, 2 Lonsdale Street
MELBOURNE VIC 3000

Under section 4.3.3A of the Education and Training Reform Act 2006.

Authority

1. Pursuant to the functions and powers vested under Part 4.3 of the *Education and Training Reform Act 2006* (ETR Act) the Victorian Registration and Qualifications Authority (VRQA) has the power to register a school and the power to review a school against the minimum standards for school registration. The powers relating to the review of a school are contained in the ETR Act, the Education and Training Reform Regulations 2017 (ETR Regulations) and the Guidelines to the minimum standards and requirements for school registration (Guidelines). It is a condition of registration of a school that the school or any person involved in the management or operation of the school participates in the review and evaluation process.
2. Under section 4.3.3A the VRQA may accept a written undertaking given by the proprietor or Principal of a registered school in connection with any matter in relation to which the VRQA has a power or function under the ETR Act; or any matter relating to non-compliance with a prescribed minimum standard for registration in Schedule 4 of the ETR Regulations (minimum standards).

Background

3. St Kevin's College is a registered Catholic F-12 boys' school. The registered proprietor of St Kevin's is The Trustees of Edmund Rice Education Australia, a statutory body corporate established under the Roman Catholic Church Communities' Land Act 1942 (NSW) (TEREA). TERE is the proprietor of schools throughout Australia, including being the registered proprietor of seven registered schools in Victoria. In addition to St Kevin's, these registered schools are Christian Brothers' College St Kilda, Parade College, St Bernard's College, St Joseph's College Geelong, St Patrick's College Ballarat and St Joseph's Flexible Learning Centre Melbourne (together with St Kevin's, the Victorian schools).
4. Under the TERE is Constitution dated 20 September 2012, the TERE Board is the governing body of the Victorian schools.

5. On 18 February 2020 the VRQA sent a letter to TERE A advising of its decision under section 4.3.3(2A) of the ETR Act to open a specific review and evaluation of St Kevin's to determine if the school has attained, and continues to attain, the minimum standards relating to governance and the care, safety and welfare of students. The specific review was opened because the VRQA believed on reasonable grounds that there were matters concerning the safety of students at the school which required urgent action to be taken by the school (s4.3.3(2A)(a)).
6. These grounds arose due to media reports regarding St Kevin's alleged failure to appropriately respond to an incident of grooming at the College in 2014. In particular, the conviction of former athletics coach, Mr Peter Kehoe, for grooming for sexual conduct with a child under 16. St Kevin's former Dean of Sport and former Principal provided references to Mr Kehoe at his trial and sentencing hearing.
7. The 18 February 2020 letter to TERE A also contained a production notice issued under section 4.3.3(3) of the ETR Act requiring the production of documents relevant to St Kevin's handling of the 2014 incident and the school's compliance with the relevant minimum standards.
8. A copy of the 18 February 2020 letter was also provided to the Catholic Education Commission of Victoria (CECV) in its capacity as the authorised review body for catholic schools.
9. On 20 February 2020 the VRQA sent a second production notice to TERE A requiring the production of additional documents.
10. TERE A sought and was granted an extension of time by which to comply with the first and second production notices.
11. On 5 March 2020, TERE A wrote to the VRQA advising that it had difficulty at the present time in complying with the production notices "in all respects" and requesting a meeting to discuss these issues. Attached to that letter were two tables that identified documents that TERE A were prepared to produce in compliance with the production notices and documents that TERE A and/or St Kevin's were variously claiming were subject to legal or litigation privilege, or alternatively, were in the possession of its former law firm and therefore unable to be produced.
12. On 10 March 2020 the VRQA responded to TERE A's 5 March 2020 letter including requesting further information regarding the grounds on which TERE A was objecting to produce certain documents.
13. On 10 March 2020 TERE A produced some documents in compliance with the production notice and reiterated TERE A and/or St Kevin's claims to privilege in relation to several classes of documents.
14. Subsequently, following discussions between the CEO of the VRQA and the Deputy Executive Director of TERE A, TERE A withdrew its objections to the production of documents and agreed to provide all documents required to be produced under the production notices.
15. On 16 March 2020 members of the executive of TERE A and the acting principal of St Kevin's met with the CEO of the VRQA and other members of staff. At that meeting the CEO outlined that the VRQA's assessment of the material produced by TERE A, had determined that St Kevin's was critically non-compliant with the care, safety and welfare minimum standard – including Ministerial Order No. 870, and was critically non-compliant with the governance minimum standard. TERE A were also advised that the findings indicated that the non-compliances were systemic in nature and that the VRQA had significant concerns regarding the compliance of the Victorian schools with the relevant minimum standards.

16. A further meeting was held on 18 March 2020 to discuss the VRQA's findings.
17. On 23 March 2020, the VRQA provided TEREА with its high level written assessment of St Kevin's non-compliances. A copy of that Assessment is at Attachment 1 and forms part of this enforceable undertaking.
18. The assessment includes findings that:
- i. TEREА as the proprietor of the Victorian schools, has not structured the governance of St Kevin's to enable: the effective development of its strategic direction, the effective management of the finances of the school and the school to fulfil its legal obligations.
 - ii. TEREА is operating outside the scope of its Constitution because of invalid delegations by the TEREА Board to the Executive Director and sub-delegations by the Executive Director to the Principal
 - iii. Confusion within TEREА about who the governing body is.
 - iv. Lack of oversight by the TEREА Board of the operation of the Victorian schools and a lack of reporting to the Board and failure by the Board to make reasonable enquiries about the operations of the Victorian schools.
 - v. TEREА as the proprietor and the TEREА Board as the governing body have little understanding of the minimum standards for school registration in Victorian including those relating to child safety.
 - vi. Lack of clarity around the role and responsibilities of the school board.
 - vii. Rule 5.2.4 of the Constitution does not comply with the not-for-profit requirements under regulation 7 of the ETR Regulations.
 - viii. TEREА needs to ensure that the Network Service Fees paid by schools to TEREА are on commercial terms and otherwise not a breach of the not-for-profit requirements.
 - ix. TEREА and St Kevin's do not operate according to a policy review schedule, several policies were old, in some cases over 10 years old.
 - x. Information in policies was not current, lacked reference to current policy frameworks and/or did not reflect recent changes to the VRQA Guidelines to the minimum standards and other requirements for school registration.
 - xi. Related policies lacked cohesion and consistency and there were significant gaps in policy advice provided in some areas.
 - xii. Information in policies was incorrect and procedural advice was lacking.

Specific non-compliances identified in documents produced are identified in the assessment at Attachment 1.

19. On 9 April 2020, TEREА accepted the findings of the VRQA review.
20. On 16 April 2020, the Chair of the TEREА Board, President of the TEREА Council and members of TEREА executive met via teleconference with the CEO of the VRQA and other staff to discuss options for ensuring the Victorian schools are compliant with the minimum standards. At that meeting, TEREА offered and the VRQA agreed to accept, an enforceable undertaking under section 4.3.3A of the ETR Act in order to ensure the Victorian schools achieve compliance with the minimum standards.

Acknowledgement of the VRQA's concerns

21. TEREА accepts the VRQA's findings identified in this enforceable undertaking.

Acknowledgments – operation of enforceable undertaking

22. In giving this undertaking, TEREА acknowledges that failure to comply with any conditions of the undertaking may result in the VRQA applying for a court order under Section 4.3.3D of the ETR Act.

23. TEREА acknowledges it has been provided with a copy of the VRQA Enforceable Undertaking Policy.

24. TEREА acknowledges that it was advised that it should seek legal and financial advice and confirms that it has taken that advice.

Undertakings

25. TEREА undertakes that:

(1) It will immediately undertake a review of the governance of the Victorian schools and in consultation with the VRQA, develop options for the governance structure of the Victorian schools which ensures compliance with the governance minimum standard (clause 15, schedule 4, ETR Regulations). By 30 June 2020 TEREА will submit the options to the VRQA, indicating the preferred option approved by the TEREА Board, by 30 June 2020.

(2) Upon completion of undertaking 25(1), TEREА will complete undertakings 25(a) to (g) below by a date to be agreed with the VRQA:

a. Provide the following documents and information:

- the Constitution of any new entity established for the purpose of governing the Victorian Schools, or an amended Constitution of TEREА;
- all financial and non-financial delegations made by the Board and any sub-delegations;
- a governance charter which includes details of the roles, responsibilities and functions of each of the governing body, any subcommittees, the executive, school boards, and the Principals.
- revised documents which replace or amend, "The Design for TEREА School Boards;
- minutes of Board and Council meetings at which any of the options, documents and amendments referred to above, were considered and adopted, including minutes of any Council meeting at which it resolved to pass any amended Constitution and minutes of any Board meetings at which recommendations were made by the Board to the Council in relation to amendment of the Constitution; and
- a diagram outlining the governance structure of the Victorian schools.

b. Provide information and evidence to demonstrate that the governing body of the Victorian schools has appropriate oversight of each Victorian schools' operations, including their strategic direction, risk management, and care, safety and welfare of students – including child safety.

c. Provide information and evidence to demonstrate reporting protocols and processes from the Victorian schools to the governing body and that the governing body is making proper inquiries as required by law, in relation to the operations of each individual Victorian school.

d. Provide evidence that the members of the governing body and executive of TEREА and each of the Victorian schools, have undertaken professional development in relation to their obligations under Ministerial Order No. 870 and the legal requirements for registration of schools in Victoria.

e. As required as a condition of registration, ensured that each Victorian school and any person involved in the management or operation of those schools participates in the review and evaluation of the schools being

conducted by CECV in its capacity as the Catholic review body and will ensure that each Victorian school addresses any non-compliances identified during those reviews by a date to be agreed by the VRQA and TEREА.

- (3) In relation to St Kevin's and by a date to be agreed with the VRQA:
- a. Provide copies of all policies and procedures required under the Guidelines in relation to the care, safety and welfare minimum standard, including policies and procedures required under Ministerial Order No. 870 as summarised in Attachment 2
 - b. Provide evidence of the role of the governing body in the development of the policies and procedures required under Ministerial Order No. 870.
 - c. Implement and provide a copy of a plan to provide professional development to all members of the governing authority, employees and contractors in relation to Ministerial Order No. 870, mandatory reporting, the reportable conduct scheme and the offences of failure to protect and failure to disclose.
 - d. Provide a copy of the plan to implement the key accepted findings of the culture review TEREА currently being undertaken and the investigation supervised by Korda Mentha.
- (4) Until such time as this enforceable undertaking is discharged, the governing body of the Victorian schools will provide minutes of the TEREА Board meetings to VRQA within two weeks following the relevant meeting.

Signed by [Redacted]

Mrs Barbara (Bobby) Court Chair as authorised representative of Trustees for Edmund Rice Education Australia

ABFC
School numbers
Date 22.05.2020

Name of witness *Rebecca Lambert-Smith*
Signature: [Redacted]
Date *22.5.20*

Mark Anderson Board Member
Signature: [Redacted]
Date 22.05.2020

Name of witness *Rebecca Lambert-Smith*
Signature: [Redacted]
Date *22.5.20*

Accepted [Redacted]

LYNN GLOVER
CEO (Director)
Victorian Registration and Qualifications Authority
Date *28/5/2020*

Name of witness *Stefanie Veal*
Signature: [Redacted]
Date *28/05/2020*



VRQA review of St Kevin's College 2020

Assessment of submission for Production Notice of 18 February 2020

Governance standard

Compliance outcome

Compliant Not compliant

Summary

EREA's submission included copies of the constitution of Trustees of Edmund Rice Education Australia, The Design for EREA School Boards, the Edmund Rice Education Australia Governance Statement and minutes of board and council meetings.

The following high-level non-compliances with the governance minimum standard were identified:

- The proprietor has not structured the governance of the school to enable: the effective development of the strategic direction of the school; the effective management of the finances of the school; and the school to fulfil its legal obligations.
- The Design and Governance Statement state that the EREA Board has delegated the responsibility for management of its schools to the Executive Director. The Executive Director has delegated the operational management of the school to the Principal. There also appear to be financial delegations to the Executive Director and the Principal. These delegations are invalid because they are not permitted under the constitution. The constitution only permits the EREA Board to delegate its duties, powers and functions, to Board Members.
- During discussions there appeared to be confusion about who in fact is the governing body for the College. Under the Constitution the governing body is the EREA Board.
- The board minutes evidence that there is little oversight by the EREA Board of the operation of the Victorian schools: There appears to be no consideration of strategic direction, risk management or ensuring the care, safety and welfare of students at an individual school level.
- The board minutes evidence that the EREA Board is not receiving reports or making sufficient enquiries about the operations of the Victorian schools (outside of financial matters) and there is little reporting of critical incidents, including child safety matters.
- The board minutes do not evidence that EREA as proprietor and the EREA Board as the governing body for all EREA Victorian schools, are effectively governing their schools and fulfilling their obligations; for example, considering and approving key policies and procedures, considering and managing risk, developing the strategic direction of the individual Victorian schools, understanding the minimum standards for school registration in Victoria and ensuring its schools meet these standards and therefore fulfil their legal obligations.
- The role and responsibilities of the school boards that provide key support for Principals are ill defined.
- There are no clear protocols or processes for reporting to the EREA Board. Where reporting occurs, it appears to be filtered through the school board and EREA Executive Director. There is therefore a risk that the Board may not be receiving key information and information in a timely manner.

Not-for-profit

- Rule 5.2.4 of the constitution permits school money and property to be used for purposes other than the conduct of the school which is in breach of the not-for-profit requirements. The use of school money to support retired Christian Brothers is an example of such a breach.
- Schools pay a Network Service Fee to EREA. EREA needs to ensure these do not breach the not-for-profit requirements. Any fees for services provided must not be excessive, and EREA must be able to demonstrate the services provided to the school are charged at commercial rates and the services are reasonably required for the conduct of the school.

Care, safety and welfare standard

Compliance outcome

Compliant Not compliant

Summary

The range of documents submitted under this standard included policies approved by EREA (e.g. Complaints Management Policy 2013) and those authorised by the College (e.g. behaviour and pastoral care policy 2007). No information was provided as to the rationale for the existence of these two policy frameworks. In addition, the following specific risks were identified:

- EREA and the College did not appear to operate according to a policy review schedule; several the policies were old, in some cases over 10 years old.
- Information in individual policies was not current; they lacked references to current policy frameworks and/or did not reflect recent changes to the VRQA's *Guidelines to the minimum standards and requirements for school registration*.
- Related policies lacked consistency and cohesion (e.g. student behaviour management policies)
- There were significant gaps in the policy advice provided for some areas (e.g. duty of care, emergency management)
- Information in policies was incorrect and procedural advice was lacking.

Non-compliances in specific documents included the following:

1. The College's Anti-bullying and harassment policy (2007) is out of date
2. The College Information Technology Student Internet Policy is old (adopted in 2006), does not reflect current risks for student use of technology or align with expectations in the College's 2020 Digital Technologies Acceptable Use Protocol Agreement (Yrs. 5 and 6)
3. The College Anaphylaxis Policy is out of date
4. The procedures for managing complaints are unclear, lack enough detail and do not support the current arrangements between VRQA and the Catholic Education Commission of Victoria Ltd (CECV) for monitoring and reporting complaints in Victorian Catholic schools
5. The College website includes two separate policies on student welfare; Pastoral Care Policy (EREA 2014) and Behaviour and Pastoral Care Policy (St Kevin's College 2007)
6. Information in the policies on Relationship-Centred Education (2013) and Anti Bullying and Harassment including cyber bullying (2008) refer to two separate approaches for managing student behaviour. Neither are up to date with the relevant section in the VRQA Guideline
7. The College Critical incident management plan and procedures lack the required detail for such a plan including procedural advice, include out of date information and have not been revised on an annual basis as required under the VRQA Guidelines.
8. No policies on the supervision of students on and off-site were submitted.

The nature and extent of these non-compliances indicate a lack of accountability and oversight for managing compliance with the minimum standards and provide additional evidence to support VRQA's finding that the College is not structured to enable it to fulfil its legal obligations.

Ministerial Order No.870 Child Safe Standards (CSS)

Compliance outcome

Compliant Not compliant

Summary

VRQA examined a range of documents required under the Ministerial Order including those published as EREA documents on the St Kevin's College website. Several documents on the website also reference additional Catholic Education Melbourne (CEM) policies. Minutes of meetings of the EREA Board from 2013 to 2020 were also examined.

The multiple types of advice raised issues in relation to:

- the agreed authorising environment for compliance with the CSS
- inconsistencies between compliance frameworks
- potential confusion arising from implementation of multiple compliance frameworks
- gaps in implementation strategies
- uncertainty as to which is the most up-to-date advice.

The Board minutes failed to provide evidence that the Board understood its responsibilities for ensuring the care, safety and welfare of students in schools or was effectively managing its accountabilities for the specific requirements under Ministerial Order No 870.

The following non-compliances were identified:

1. There was no evidence that the governing authority was actively engaged in child safety at St Kevin's College, had endorsed any of the College child safe policies and procedures or had received any guidance and training on child safe related risks at the College.
2. Several policies had not been updated as required or as stated on the policy itself.
3. Policies included inaccurate information or missing information (e.g. procedures for obligations under the Reportable Conduct Scheme).
4. Generic EREA policies for national application have not been tailored to Victorian requirements.
5. Arrangements for new staff induction and for monitoring the suitability of ongoing staff were unclear
6. The College risk register was inadequate. It did not reflect the consideration of child abuse risks and controls in the College school environment. There was no evidence that the governing authority was monitoring and evaluating risks in the College environment.
7. There was no information on strategies to address identified risks related to gathering and verifying Working with children check cards.
8. The evidence provided on strategies for promoting empowerment and participation of students, particularly regarding reporting child abuse allegations was inadequate.

Report acceptance statement

The College accepts the findings of the VRQA review:

SECTION 1

- Yes (Please also tick the appropriate statement)
- No** (Please refer to Section 2)

SECTION 2

Where the College disputes the review findings, the reasons should be detailed in a "School Comments" document attached with this statement.

This page, together with any comments on the review findings should be sent to vrqa.schools@edumail.vic.gov.au: ATTENTION: St Kevin's College Review 2020

Name of School Principal / Proprietor (or authorised representative) Mrs Bobby Court

Position EREA Board Chair

Signature *B. B. Court*

Date 09.04.2020

Email to: vrqa.schools@edumail.vic.gov.au

Care, safety and welfare of students

Policies and Procedural documentation requirements	
Duties of care owed to students – including precautions to prevent the abuse of a child and the appropriate measures protecting younger students or students with disabilities	<input type="checkbox"/>
Anti-bullying and harassment, including cyber bullying	<input type="checkbox"/>
Procedures for restrictive interventions to protect the safety of a student and members of the school community	<input type="checkbox"/>
Appropriate arrangements for on-site and off-site supervision of students	<input type="checkbox"/>
Supervision arrangements ensuring the safety and welfare of students when learning with another provider	<input type="checkbox"/>
Arrangements for ill students	<input type="checkbox"/>
Accident and incident registers	<input type="checkbox"/>
Internet use policies	<input type="checkbox"/>
Managing complaints and grievances – including procedural fairness and accessibility to the school community	<input type="checkbox"/>
Student welfare policy	<input type="checkbox"/>
Emergency and critical incident plan(s)	<input type="checkbox"/>
Behaviour management/discipline	<input type="checkbox"/>
A policy that prohibits corporal punishment	<input type="checkbox"/>
Communications policies and procedures on the care, safety and welfare of students to staff, students, parents, guardians and the school community	<input type="checkbox"/>
Attendance monitoring procedures that: <ul style="list-style-type: none"> • check and record the daily attendance of all students • monitor attendance twice daily and identify absences from school or class • identify the person(s) with responsibility for monitoring daily attendance • follow up unexplained absences on the day of a student's absence • notify parents and guardians of unsatisfactory attendance • maintain current contact details for parents and guardians • accurately record attendance on student files. 	<input type="checkbox"/>

Ministerial Order No. 870 Child Safe Standards

Policies and Procedural documentation requirements	
Child Safe Policy or Statement of commitment to child safety	<input type="checkbox"/>
Procedures to ensure all employees and volunteers required to do so by the <i>Working with Children Act 2005</i> have a current Working with Children Check	<input type="checkbox"/>
Child Safety code of conduct	<input type="checkbox"/>
Recruitment policy and procedures, detailing staff selection, supervision and management practices for a child-safe environment, ongoing suitability to work with children	<input type="checkbox"/>
Job reference and vacancy templates which clearly sets out child safety requirements as specified in MO870	<input type="checkbox"/>
Position Descriptions	<input type="checkbox"/>
Employment /Induction checklist	<input type="checkbox"/>
Volunteer policy	<input type="checkbox"/>
Staff training policy	<input type="checkbox"/>
Staff handbook	<input type="checkbox"/>
Risk management policy	<input type="checkbox"/>
Child safety risk register	<input type="checkbox"/>
Child safety policy for students	<input type="checkbox"/>
Student code of conduct	<input type="checkbox"/>
Diversity and inclusion policy	<input type="checkbox"/>
Strategies to embed an organisational culture of child safety – the school governing body must: <ul style="list-style-type: none"> • develop strategies to embed a culture of child safety at the school; • allocate roles and responsibilities for achieving the strategies; • inform the school community about the strategies, and allocated roles and responsibilities; • put the strategies into practice, and inform the school community about these practices; and • periodically review the effectiveness of the strategies put into practice and, if considered appropriate, revise those strategies. 	<input type="checkbox"/>
Policies procedures for ensuring all staff and the school governing authority understand all legal obligations for responding and reporting, including: <ul style="list-style-type: none"> • mandatory reporting • the failure to disclose offence • the failure to protect offence • reportable conduct as required by the Reportable Conduct Scheme under the Commission for Children and Young People. 	<input type="checkbox"/>
Procedures for responding to and reporting allegations of suspected child abuse which the school governing	<input type="checkbox"/>

<p>authority has ensured is:</p> <ul style="list-style-type: none"> • sensitive to the diversity characteristics of the school community • publicly available • accessible to children, school staff, and the wider community. <p>Further, the procedures must adhere to the content which <u>must</u> and <u>must not</u> be included as specified in MO870.</p>	<p>Strategies to identify and reduce or remove risks of child abuse – as specified in MO870, the school governing authority has:</p> <ul style="list-style-type: none"> • developed and implemented risk management strategies regarding child safety in school environments • taken into account the school environments, activities conducted, and characteristics of all children expected present • recorded risks and actions (risk controls) to reduce or remove risk • monitored and evaluated the effectiveness of the implementation of its risk controls • provided training, as least annually, to ensure appropriate guidance and training is provided to the individual members of the school governing authority and school staff about individual and collective obligations and responsibilities; child abuse risks; and the school's current child safety standards. <p>Strategies to promote child empowerment and participation – the school governing body must deliver appropriate education about:</p> <ul style="list-style-type: none"> • standards of behaviour for students attending the school • healthy and respectful relationships (including sexuality) • resilience • child abuse awareness and prevention.
	<input type="checkbox"/>