

CHILD SAFE POLICY

KUMON GUNGAHLIN EDUCATION CENTRE

Last revised 1 September 2019

Disclaimer: This document has been compiled by Kumon Australia to assist Kumon Education Centres. It is a guide only and should not be considered legal advice or a legal document. Kumon Education Centres should seek professional advice should they have any questions regarding the Child Safe Policy.

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Introduction

Kumon is committed to the safety and wellbeing of all children and young people accessing our service. We support the rights of the child and will act without hesitation to ensure a child-safe environment is maintained at all times. We also support the rights and wellbeing of our staff and encourage their active participation in building and maintaining a secure environment for all participants.

This Child Safe Policy demonstrates the commitment of Kumon Gungahlin Education Centre to child safety and to provide an outline of the policies and practices we have developed to keep everyone safe from any harm, including abuse.

This Policy incorporates our risk management strategy, code of conduct, safe environment procedures, recruitment procedures and management of employees.

Complying with the Policy

All people working in and visiting the Kumon Gungahlin Education Centre are expected to comply with this Child Safe Policy.

Implementing the Policy

This Child Safe Policy was adopted for use by Kumon Gungahlin Education Centre on 1st October 2019.

All employees who work with children and young people are to receive a copy of this document and are expected to familiarise themselves with it.

A copy of the Kumon Gungahlin Education Centre Child Safe Policy will be available on request to any parents, employees and visitors.

Strategies for Communication

The Instructor takes responsibility for ensuring all staff and parents are aware of the Child Safe Policy, where to access it in-centre, and its role in creating a safe learning environment.

The creation of a safe classroom environment is supported by the following strategies:

- Keeping a hard copy of the Child Safe Policy at the Kumon Gungahlin Education Centre to provide access for all stakeholders;
- Holding discussions with parents during the enrolment process about the Parent Agreement and Child Safe Policy;
- Regularly notifying parents of necessary protocols for children coming to and leaving the Centre, including scheduled pick-up times, and waiting room and doorway management;
- Training staff in child safe practices and the Child Safe Policy both during the staff induction process and on an ongoing basis;
- Displaying posters and other materials inside the Centre which provide guidelines and encouragement for correct classroom procedures and positive behaviours;
- Maintaining a communication register allowing a direct communication channel for parents to enable them to share feedback.

Procedures for Reviewing the Child Safe Policy

To ensure that the Child Safe Policy for the Kumon Gungahlin Education Centre remains current and effective in identifying and minimising risks of harm to children, this policy will be monitored and reviewed every two years.

This Policy will also be reviewed following any safety incidents or the actioning of a disclosure or suspicion of abuse so that we may determine whether any changes need to be made to our Policy and/or whether any follow up action should be taken.

The Kumon Instructor and all staff will be involved in the review of the Child Safe Policy.

Issues to be considered in the review will include:

- Whether all stakeholders adhered to the policies and procedures
- Any incidents that occurred during the review period and the outcomes of these incidents
- The effectiveness of the policies and procedures

The date of the review, who was present and what was discussed will be recorded.

Following the Review

All staff will be advised of any changes to policies and procedures, and training will be provided as required.

Code of Conduct

Kumon Gungahlin Education Centre is committed to implementing the Child Safe Policy, and to incorporating it into the culture of the Centre.

What we value most is the individual child. The safety and welfare of each child is our paramount concern. Children are the beneficiaries of the pursuit of the Kumon Mission. We declare that all Kumon study must always be useful for the growth and future of each individual child.

Kumon Gungahlin Education Centre will ensure that high standards of conduct are maintained at all times. The core expectations of any responsible organisation require us to treat all people with fairness, sensitivity and dignity, and to care for those who are less powerful and in need of nurture and protection.

Therefore, each student of Kumon Gungahlin Education Centre has the right:

- To full and effective use of his or her personal, civil, legal and consumer rights;
- To quality care which is appropriate to his or her needs;
- To be treated with dignity and respect and to receive services without exploitation, abuse or neglect;
- To receive services without discrimination or victimisation, and without being obliged to feel grateful to those providing his or her care;
- To personal privacy;
- To be treated and accepted as an individual, and to have his or her individual preferences taken into account and treated with respect;
- To continue his or her cultural and/or religious practices and to retain the language of his or her choice, without discrimination;
- To select and maintain social and personal relationships with any other person without fear, criticism or restriction;
- To freedom of speech;
- To have access to information about his or her rights, and any other information which relates to him or her personally;
- To complain and to take action to resolve disputes;
- To have access to advocates and to other avenues of redress; and
- To be free from reprisals, or a well-founded fear of reprisal, in any form, for taking action to enforce his or her rights

The Standards of Appropriate Behaviour

Staff are expected to abide by the Code of Conduct and standards of appropriate behaviour at all times. Staff will be punctual, dress appropriately and conduct themselves in a manner that upholds the values of the Kumon

Organisation. They will be courteous to our students and their families as well as one another and treat everyone with respect. Staff will respect the child's feelings and privacy when engaging in physical contact of any kind.

Bullying, discrimination, sexual harassment and grooming are always unacceptable behaviours.

Bullying is the repeated and intentional use of words or actions against someone or a group of people to cause distress and risk to their wellbeing. It can be physical, verbal or emotional, and it also includes messages, public statements and online behaviour intended to cause distress or harm.

Discrimination occurs when a person, or a group of people, are treated less favourably than another person or group because of their background or certain personal characteristics.

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances.

Grooming is any conduct engaged in by an adult in relation to a person under 16, or a person the adult believes is under 16 years of age, with intent to facilitate their procurement to engage in a sexual act (not limited to acts involving physical contact) or expose them to any indecent matter.

The following table sets out Kumon's standards of appropriate versus inappropriate behaviour:

Behaviour	Appropriate	Inappropriate
Language	<ul style="list-style-type: none"> Using encouraging/positive words and a pleasant tone of voice Open and honest communication 	<ul style="list-style-type: none"> Insults, criticisms or name calling Bullying, swearing, yelling or coarse language Sexually suggestive comments/jokes
Relationships	<ul style="list-style-type: none"> Being a positive role model Building relationships built on trust Empowering children to share in decisions regarding their progress 	<ul style="list-style-type: none"> Favouritism or giving gifts Spending excessive amounts of time alone with children Contact outside of working hours (either physical or via email/phone/social media) Bullying, harassment "Grooming" children or young people
Physical Contact	<ul style="list-style-type: none"> Allowing for personal space Where necessary for Instructional purposes Touching due to medical emergency or protecting from physical harm All physical contact must be non-threatening 	<ul style="list-style-type: none"> Violent or aggressive behaviour including hitting, kicking, slapping or pushing Kissing or touching of a sexual nature consistent with 'grooming'
Other	<ul style="list-style-type: none"> Appropriate attire/clothing for role Use of internet/mobile phone for work related purposes only Adherence to No Smoking policy Reporting breaches of this Policy Respecting privacy of children and families 	<ul style="list-style-type: none"> Using alcohol or other substances before or during work Inappropriate clothing Sending inappropriate emails or making inappropriate phone calls Smoking during work hours Ignoring disclosures or concerns of child abuse

Behaviour Management Strategies

The behaviour of children in the Centre will be managed in line with the Instructional principles and guidelines of Kumon as well as in the course of maintaining the safety of all persons. If a child does not abide by the rules set by Kumon or becomes an obstruction to the care of other children and may cause harm, the child may be removed and/or referred back to their parent or guardian.

At no time will any employee or visitor of Kumon administer any form of physical, emotional, financial or psychological discipline.

All students and parents attending Kumon are made aware of acceptable and unacceptable behaviour during the enrolment process and initial centre attendances.

Photography and Video Footage

As part of our ongoing efforts to learn how to develop the students and the Kumon Gungahlin Education Centre further, students' learning situations during class may, from time to time, be photographed and/or videoed by the Kumon Instructor or Kumon Australia Pty Ltd employees.

These photographs and/or video footage are strictly for internal training purposes only, and will not be shown externally without the express permission of the child/ren's parent or guardian.

Technology and Social Media Policy

As part of our policy student photos will not be displayed on social media without express parental permission.

Confidentiality and Privacy

All Kumon Centres are bound by the privacy principles established under the *Privacy Act 1988*. The personal information that Kumon collects or holds can only be used for the purpose of administering the Kumon Centre and to monitor and improve the student's performance as well as the performance of the Centre.

Personal information may only be disclosed by the Kumon Instructor to:

1. The person to whom the personal information relates;
2. The parent/guardian of a minor to whom the personal information relates;
3. Kumon Australia and New Zealand;
4. Kumon Australia and New Zealand's overseas related entities including, but not limited to, Kumon Malaysia and Kumon North America; or
5. As may be required by law.

Personal information may only be disclosed by Kumon Gungahlin Education Centre employees to:

1. Kumon Australia and New Zealand; or
2. As may be required by law.

To ensure the security of personal information, the Kumon Gungahlin Education Centre will take all reasonable steps to protect personal information from issue, interference and loss, and from unauthorised access, modification or disclosure. Confidentiality requirements, security measures and control of physical access will be used. When information is no longer required it will be destroyed or de-identified.

A Safe Environment

Incidents of abuse are unlikely to take place in front of another person and the presence of a witness can assist in clarifying questionable allegations. For these reasons, working in pairs is the preferred method. Where this is not possible, instruction of students will be done in a room which can be observed easily by others. In these circumstances, parents may be asked to remain at the Centre.

Initiations and secret ceremonies are prohibited. All aspects of Kumon related to children will be open to observation by family, friends or guardians.

Kumon Gungahlin Education Centre employees have the right to ask people who do not have a valid reason to be present at the Kumon Gungahlin Education Centre or related activities to leave. Police may be contacted if such persons refuse to comply with any reasonable request to leave.

Pick up and Drop off Procedures

Children must be brought to and picked up from the Kumon Gungahlin Education Centre by their parents, or by guardians who have authority to care for them, unless prior arrangements have been made.

- Students must be collected from the Kumon Centre in the courtyard outside the front of the Kumon Centre. Parents must be waiting outside 10 minutes prior to their child's class finishing.
- If a child has no parent to collect them after their class they will be asked to wait inside the Kumon Centre and their parents contacted.
- If a child is not collected by the end of centre time and a parent and/or guardian cannot be reached the police will be contacted.

Emergency & Evacuation Procedures

The following procedures are in place for emergency and evacuation.

These are outlined on both exit doors in writing and diagram form. The meeting point is the Palmerston playground. Please refer to the exit doors in the Centre for the procedures.

Management of Illness and Injury

The following procedures will ensure that staff respond as quickly as possible and in the best interests of the child, when a child is injured or becomes ill. All staff will receive training in the procedures to be followed in the case of an accident resulting in injury.

The First Aid Officer at Kumon Gungahlin Education Centre is Susan Davis and Daniella Montalla .

The Kumon Instructor and all staff at the Kumon Gungahlin Education Centre must comply with this procedure.

Procedures for Accidents/Injuries

When an accident occurs and/or a person is injured:

- Remain calm and alert the First Aid Officer;
- Keep the injured person calm until the First Aid Officer arrives;
- The First Aid Officer will decide on the appropriate course of action in the treatment of the injury, or if it is necessary to call emergency services;
- If it is safe to do so, remove the risk of further injury by making the accident scene safe;
- Keep other children in the Centre calm and away from the injured person;
- Inform the parent and/or guardian/s of the child that an accident or injury involving their child has occurred;
- The Kumon Instructor will complete the Incident Report Form. *See Appendix 1 – Incident Report Form*;
- Any other Kumon staff involved in the incident must also make a written statement on the Incident Report Form;
- Medication will not be administered by the First Aid Officer or Kumon Instructor. However, any necessary management procedures for students who require individual health care plans may be discussed with the parent and/or guardian during enrollment.

Recruitment and Management of Staff

Kumon Gungahlin Education Centre is an equal opportunity employer that is committed to providing a high quality of effective service ensuring the potential of all Kumon students is being developed and nurtured to the maximum through the Kumon Programmes. In order to achieve this, it is important that the people who work within our Education Centre share the same vision and values as outlined in our Mission Statement.

Selection of Assistants

All job advertisements will reflect our work environment, culture and the skills required to be successful in our roles. Job descriptions will be provided to applicants which outline the qualifications, skills, experience and mandatory checks required.

Our candidates will:

- Complete an Employment Application and Declaration;
- Undergo an interview and selection process including the checking of references;
- Fulfill all criteria with regard to educational competencies in mathematics and English;
- Have obtained a Working with Vulnerable People Registration before appointment where they are over 16;
- Continue to obtain a Working with Vulnerable People Registration every five years;
- Upon employment, candidates will be required to sign the Standard of Appropriate Behaviour document.

Training and Development

All assistants will receive training appropriate to their particular role. This may take the form of group or individual training sessions conducted by the Kumon Instructor. On-the-job training, either by the Kumon Instructor or a senior staff member will also be offered where appropriate. All staff will ensure that they are aware of their obligation to:

- advise Kumon and/or their direct supervisor of concerns about the safety, welfare and wellbeing of children and young people that arise during the course of their work; and
- report suspected risks of significant abuse and of the procedures for doing so.

Inexperienced staff will always work with a more experienced staff member when working with students.

All staff will be given:

- A copy of the Kumon Gungahlin Education Centre Child Safe Policy, which they are asked to read thoroughly and acknowledge understanding; and
- Refresher training on an annual basis.

The induction process for new staff is attached at Appendix 6. A register of inductions and participation in annual updates will be maintained.

Management

All assistants are expected to abide by the Code of Conduct and perform their job to the best of their ability - enthusiastically and with the best interest of the students at the forefront of their mind. Each assistant will have a probationary period of 2 months. At the end of that time, a meeting will be held between the assistant and the Kumon Instructor to evaluate the performance of the assistant and to discuss the next step.

Performance evaluations are conducted on an informal ongoing basis as required.

Feedback Procedures and Assistance

Kumon Gungahlin Education Centre welcomes feedback and enquiries of parents and students. Susan Davis, the Kumon Gungahlin Education Centre Instructor may be your first point of contact. She may be contacted via phone, email, text message or the correspondence book in Centre. Should there be any concerns that relate to

the Kumon Gungahlin Education Centre Instructor, the Kumon Australia New South Wales/Australian Capital Territory Division or Head Office (ph: 02 9467 2200) should be contacted.

Disclosures or Suspicions of Abuse

The following procedures will ensure that staff respond as quickly as possible and in the best interests of the child or young person when disclosures or suspicions of abuse are received. Kumon Gungahlin Education Centre recognises that children and young people are vulnerable members of the community and that extra measures must be taken to protect and support them.

As soon as possible upon commencing employment, all staff will receive training in identifying risks of abuse, and handling disclosures or suspicions of abuse. All employees, the Kumon Instructor and Kumon Associates, including fellow Kumon Instructors, are expected to comply with this procedure.

Reasonable Suspicion means fair and practical reason to believe an incident involving Abuse has occurred based on either verbal communication, hearsay, rumour or observation of behaviour.

All Kumon staff must follow the procedure to document and report any disclosed or suspected abuse to their Kumon Instructor, who will then:

- Offer support to the child, parents, the person who reports and the accused staff member;
- Initiate internal processes to ensure the safety of the child, clarify the nature of the complaint and commence disciplinary process (if required); and
- Decide, in accordance with legal requirements and duty of care, whether the matter should or must be reported to the police or child protection, and make the report as soon as possible if required.

If a child is in immediate danger, 000 should be called.

Should the Kumon Instructor be suspected of causing harm to a student this should be reported to the Kumon Head Office on 02 9467 2200.

Definitions

Abuse may be categorised in the following types:

- *Physical abuse*, for example, hitting, punching, kicking, shaking, burning, pulling out hair, biting, or alcohol or other drug administration.
- *Emotional or Psychological abuse*, for example, devaluing, ignoring, rejecting, corrupting, isolating, terrorising or family violence.
- *Neglect*, for example, inadequate care and supervision, failure to provide adequate nutrition, clothing, or personal hygiene or necessary health care, disregard for potential hazards in the home, allowing children to engage in chronic truancy.
- *Sexual abuse*, for example, any sexual behavior imposed on a child including sexual jokes or touching, exposing children to sexual acts or pornography or having sexual intercourse with a child or young person under 16 years of age (even if the child appears to have consented).

Suspicion of Abuse

You can suspect abuse if you are concerned by:

- A physical environment that may pose a risk to children
- Inappropriate or special relationships developing between staff and children
- Inadequate staff-child supervision ratios
- Breaches of the Code of Conduct, particularly if they are persistent
- Feelings of discomfort about interactions between a staff member and a child
- Suspicions or beliefs that children are at risk of harm
- Observations of concerning changes in behavior
- Children's disclosures of abuse or harm, or

- The presence of new, unexplained and suspicious injuries.

Disclosure of Abuse

A disclosure of abuse occurs when someone, including a child, tells you about abuse that has happened or is likely to happen. Disclosures of abuse may start with:

- “I think I saw...”
- “Someone told me that...”
- “Just think you should know....”
- “I’m not sure what I want you to do but....”

Procedures to Minimise Abuse of Children and Young People

The Kumon Gungahlin Education Centre and its entire staff work to minimise abuse of children and young people by acting in a manner that supports their interest and wellbeing, by:

- Making sure that children know that it is their right to feel safe at all times;
- Teaching them about acceptable and unacceptable behaviour;
- Letting them know who is and who is not an employee in our Centre;
- Making sure they are safe by ensuring their environment meets all safety requirements;
- Taking anything a child or young person says seriously and following up on their concerns;
- Listening to children and young people and letting them know that staff are available for them if they have any concerns.

Procedures for Receiving a Disclosure of Abuse

When receiving a disclosure of abuse, Kumon Gungahlin Education Centre employees will report the disclosure of abuse to the Care and Protection Services General Public Line as soon as possible. The person receiving a disclosure will:

- Remain calm, listen attentively and find a private place to talk;
- Reassure the child that the abuse is not their fault;
- Advise the student that they have done the right thing in telling someone. Instead of promising to keep a secret, they will inform the student that they will be telling someone who can keep the student safe;
- Only ask enough questions to confirm the need to report the matter. No leading or probing questions will be asked as this could cause distress or confusion, and interfere with any later enquiries/investigations;
- Not attempt to conduct their own investigation or mediate an outcome between the parties involved.

Reporting Guidelines for Disclosures or Suspicions of Abuse

Following are the actions we will take within 24 hours following a disclosure or suspicion of abuse.

1. Documenting a suspicion or disclosure of abuse

An incident report form will be completed and the details recorded by the reporter so that they are accurately captured. These include:

- time, date and place of disclosure;
- the child’s words of what happened and what was said, including anything you said and any actions that have been taken;
- date of report and signature.

All documents relating to the disclosure of abuse will be held in a secure location where a breach of privacy cannot occur. All names, details and documents relating to these matters will be kept private and confidential.

2. Reporting the disclosure or suspicion of abuse to authorities

Our organisation will not conduct its own enquiries in relation to the disclosure or suspicion of abuse, or try to come to any agreement between the parties involved. The Kumon Instructor will contact the relevant authority to ensure information provided is comprehensive and accurate.

Report the matter to all of the following relevant organisations:

- Care and Protection Services General Public Line on 1300 556 729; and
- Kumon Head Office on 02 9467 2200.

Actions Following a Disclosure of Abuse

Support and counselling will be offered to all parties involved.

The child or young person – the children and young people involved will be offered appropriate counselling and support. This may include referring the child or young person, and their family to other appropriate services.

The person who made the report – details of the person who made the report are to be kept completely confidential and will not be made available to the family of the child or young person, or the person against whom the allegation has been made.

The person against whom the allegation has been made - if the person responding to the allegation of harm is a member of staff at the Kumon Gungahlin Education Centre, their duties will be reviewed. If they continue to interact/work with children, they will be appropriately supervised at all times.

The escalating procedures will be as follows:

- The automatic suspension from all work or other duties within the Kumon Gungahlin Education Centre while under investigation;
- The automatic termination of their employment or involvement with Kumon if found guilty of committing abuse by a court.

Support and advice can be received through telephone services such as:

- Kids Help Line: 1800 55 1800
- Lifeline: 13 1114
- Parent Help Line: 1300 1300 52

Managing Breaches of the Child Safe Policy

A breach is any action or inaction by any member of staff, which fails to comply with any part of the Policy. This includes any breach in relation to:

- The Code of Conduct for interacting with students, parents and other staff members;
- Procedures for handling disclosures or suspicions of abuse, including reporting guidelines.

The Kumon Instructor, employees, contractors and visitors (including students and parents) are required to raise any concerns about behaviours which breach this Policy. Concerns may be raised verbally or in writing to the Kumon Instructor. The Kumon Instructor will ensure there is written record of the incident.

Breaches will be managed in a fair, unbiased and supportive manner. The Kumon Instructor will be responsible for the management of any breaches of the Child Safe Policy as outlined below:

- All people concerned will be advised of the process;
- All people concerned will be able to provide their version of events;
- The details of the breach, including the versions of all parties and the outcome will be recorded;
- Matters discussed in relation to the breach will be kept confidential;
- An appropriate outcome will be decided.

Should there be a concern that the Kumon Instructor has breached the Child Safe Policy the Kumon Head Office should be contacted.

Depending on the nature of the breach, outcomes may include:

- Emphasising the relevant component of the Child Safe Policy, for example, the Code of Conduct;
- Providing closer supervision;
- Further education and/or training;
- Mediating between those involved in the incident (where appropriate);

- Disciplinary procedures if necessary;
- Reviewing current policies and procedures and developing new policies and procedures if necessary.

Details of the breach and its outcomes will be recorded and kept in a confidential and secure location.

Managing High Risk Activities and Special Events

Special events may occasionally be held by Kumon Gungahlin Education Centre outside the usual class time and location. These events could include award ceremonies and promotional activities which may introduce additional risks. These risks are assessed by the Instructor as part of the event planning process.

Potential issues and hazards will be assessed for their risk level according to the matrix below:

Risk Rating Matrix

Likelihood	Minor consequence	Moderate consequence	Major consequence
Unlikely	LOW RISK	MODERATE RISK	HIGH RISK
Possible	LOW RISK	MODERATE RISK	HIGH RISK
Likely	MODERATE RISK	HIGH RISK	HIGH RISK

Examples of Minor, Moderate and Major Consequences:

Level	Consequence
Minor	first aid treatment, minor damage to property, minor financial loss
Moderate	medical treatment, moderate financial loss
Major	extensive injuries and/or death, investigation by authorities, major financial loss

The Special Event Risk Assessment Template (see *Appendix 7*) will be completed as part of the planning process for special events.

An activity or special event will be deemed a high risk activity when it incorporates a hazard with a HIGH RISK rating which does not usually form part of the usual operation of a Kumon centre. Possible issues to be considered include:

- Transportation
- Toileting/change room procedures
- Appropriate supervision of children and ratio of adults to children
- Managing medications and allergies
- Managing illness/injury
- Procedures applying to visitors
- Any risks presented by the physical environment

In the event a special event is assessed as HIGH RISK the following steps will be followed:

1. Risk control measures will be planned and developed by the Instructor.
2. All staff members involved in the event will be briefed on the completed Special Event Risk Assessment Template.
3. Implementation and monitoring of associated risk control measures will be conducted during the event by the Instructor.