

# Safeguarding Policy

## About

Sophia Education Ministries (Sophia) is a Company limited by Guarantee and a Public Juridic Person, exercising both civil and canonical responsibilities for member schools formerly owned and operated by the Religious of the Sacred Heart (RSCJ Sisters).

The Sophia member schools (member schools) are:

- Kincoppal - Rose Bay School, Vaucluse, NSW
- Sacré Cœur, Glen Iris, Vic
- Stuartholme School, Toowong, Qld

## Purpose

The purpose of this Policy is to:

- Help protect people that interact with, or are affected by, Sophia through our member schools.
- Define the key terms we use when talking about protecting people or safeguarding.
- Set out and develop the way Sophia manages safeguarding risks.
- Set out the specific roles and responsibilities of persons working in and with Sophia.
- Facilitate the safe management of incidents.
- Support a positive and effective internal culture which promotes the safety and care of all.

## Policy

**Sophia Education Ministries has zero tolerance for all forms of abuse, neglect and exploitation.** All people, regardless of their age, gender identity, race, religious beliefs, disability, sexual orientation, family or social background, have equal rights to protection from abuse, neglect and exploitation.

Sophia and our member schools commit to promoting and protecting the welfare and human rights of people that interact with, or are affected by, our work.

Sophia recognises that some individuals and groups may be at increased risk of abuse, neglect or exploitation, and pays particular attention to these individuals and groups as we develop and implement services and when responding to concerns.

Sophia upholds the right of all children to be protected from all forms of abuse, neglect and exploitation, including protection from physical and psychological harm, sexual abuse, and witnessing family violence. Sophia incorporates the requirements of the National Principles for Child Safe Organisations, National Catholic Safeguarding Standards and state-based Child Safe Standards into all our practices and systems and takes seriously all disclosures and reports of child abuse.

Sophia's Board, staff, volunteers, member schools, partners and contractors share responsibility for protecting everyone from abuse, neglect and exploitation. Beyond this, particular people have specific responsibilities, and they must carry out their duties without exception.

Sophia's Board, staff and volunteers must comply with Sophia's **Code of Conduct**, policy statements, procedures and practice guidance in relation to the safety of all. Member schools operationalise this Code of Conduct in their individual settings.

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Sophia takes a survivor-centric approach in all we do.

Sophia supports our member schools to actively encourage children and adults interacting with our schools to be part of decisions which impact them and speak up about any concerns they may have.

Sophia supports our member schools to actively listen and respond to the views and concerns of all children and adults interacting with our schools.

Sophia and our member schools have processes for responding to complaints and managing incidents when they arise that must be followed.

## Definitions

<b>Abuse, neglect or exploitation</b>	Means all forms of physical and mental abuse, exploitation, coercion or ill-treatment. This might include, for example: <ul style="list-style-type: none"> <li>• Sexual harassment, bullying or abuse;</li> <li>• Sexual criminal offences including child sexual abuse, grooming, rape and sexual assault;</li> <li>• Threats of, or actual violence, verbal, emotional or social abuse;</li> <li>• Cultural or identity abuse, such as racial, sexual or gender-based discrimination or hate crime;</li> <li>• Coercion and exploitation;</li> <li>• Abuse of power.</li> </ul>
<b>Reasonable grounds to suspect</b>	Means a situation where a person has some information that leads them to believe that abuse, neglect or exploitation has taken place, is taking place, or may take place. It comes with a low burden of proof (in fact, no proof is needed), but is based on some information. Questions that may help a person to determine whether they have 'reasonable grounds to suspect' include: <ul style="list-style-type: none"> <li>• Could you explain to another person why you suspect something? <i>This helps to make sure that your suspicion is based on information, even if you have no proof.</i></li> <li>• Would an objective other person, with the same information as you, come to the same conclusion? <i>This helps to make sure that your suspicion is as objective as possible.</i></li> </ul>
<b>Safeguarding</b>	Means protecting the welfare and human rights of people that interact with, or are affected by, Sophia, particularly those that might be at risk of abuse, neglect or exploitation. This refers to any responsibility or measure undertaken to protect a person from harm.
<b>Survivor-centric approach</b>	Means considering and lawfully prioritising the needs, right and wishes of survivors.

## Managing safeguarding risk

The way Sophia manages safeguarding risks will be:

- Holistic – Sophia, our member schools and stakeholders, will work to prevent, detect and take action when concerns are raised or incidents occur
- Risk-based and proportionate – Sophia and our member schools will regularly assess the risks to people in our operations and develop proportionate controls to mitigate those risks
- Survivor-centric – Sophia will put survivors at the heart of its approach to safeguarding

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- Lawful – Sophia will ensure that we understand and comply with the law in everything we do, in all jurisdictions in which our schools work

Sophia will manage safeguarding risks by:

- Having up to date and documented risk assessments
- Maintaining a register of Sophia's legal obligations for safeguarding, workplace health and safety and all other regulatory requirements
- Establishing and supporting a Safeguarding Committee, which is responsible for the implementation of our child safe action plan and maintenance of our safeguarding systems.
- Ensuring that each member school establishes a local Safeguarding Committee to ensure localised responses to child safety are appropriately implemented and monitored. School-based safeguarding committees report through their Boards to the Sophia Board regarding any significant safeguarding concerns.
- Having an action plan that sets out how we manage and maintain our safeguarding systems and processes
- Adhering to this Policy and our Code of Conduct
- Doing due diligence checks for all Sophia staff, volunteers and contractors
- Implementing policies, procedures and systems that introduce controls to reduce the likelihood and consequence of incidents
- Conducting awareness-raising training for personnel on risks, expectations and individual responsibilities
- Maintaining reporting processes, ensuring confidentiality is maintained in individual matters while reporting trends and actions to increase transparency and accountability
- Developing an incident response plan for any safeguarding breaches
- Member schools undertaking an annual safeguarding self-assessment and reporting results annually to the Sophia Board
- Monitoring and periodically reviewing the effectiveness and proportionality of our safeguarding approach

## Managing incidents

Harassment, abuse, neglect and exploitation are all serious misconduct and Sophia and our member schools reserve the right to:

- Take disciplinary action against those it believes are responsible, which may include dismissal;
- Take civil legal action;
- Report the matter to law enforcement.

### *Reporting suspected incidents*

All staff, volunteers and third parties must, as soon as practicable, report any suspicion that an incident has taken place, may be taking place, or could take place.

They may do this through direct reporting to:

- Any member of the Sophia Board or member school Board member
- Sophia Executive Officer
- Member school Principal
- Sophia Safeguarding Coordinator

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- Member school Safeguarding Coordinator

If a person believes that another person is at risk of immediate harm or the victim of a criminal offence, they must dial 000 to speak with Police.

#### *Responding to suspected incidents*

All suspected, perceived potential or actual incidents will be managed through an individualised incident response plan

#### *External reporting*

In the majority of cases, a member school will be responsible for ensuring all appropriate reporting is undertaken in a timely and thorough manner. However, where Sophia becomes directly aware of an incident, Sophia will work with the relevant member school to:

- Report any suspicion of a criminal offence to the Police in the appropriate jurisdiction;
- Meet all regulatory body requirements regarding the reporting of incidents, including for Reportable Conduct Schemes;
- Report any qualifying matter to the ACNC.

## Privacy and data protection

All personal information considered or recorded will respect the privacy of the individuals involved unless there is a risk to someone's safety. Sophia will protect personal information.

Sophia's **Privacy Policy** applies.

## Responsibilities

While the responsibility to protect people is shared by all who work with or at Sophia and our member schools, some individuals have specific obligations with which they must comply.

Board Members – Sophia & member school Boards	<ul style="list-style-type: none"> <li>• Promote a positive culture of safety and care for all;</li> <li>• Protect all people that interact with, or are affected by, Sophia and our member schools;</li> <li>• Ensure that there are appropriate and effective ways for Sophia to protect all people;</li> <li>• Ensure that Sophia and our member schools observe all relevant laws and regulations relating to safeguarding;</li> <li>• Ensure that Sophia takes a survivor-centric approach.</li> </ul>
Sophia Executive Officer	<ul style="list-style-type: none"> <li>• Promote a positive culture of safety and care for all;</li> <li>• Ensure Sophia has effective and appropriate ways to manage safeguarding and legal compliance;</li> <li>• Ensure the appointment of a Safeguarding Coordinator with appropriate skills and competency;</li> <li>• Ensure that Sophia's approach to safeguarding includes taking reasonable steps to protect people;</li> <li>• Ensure that reports to external parties are made in accordance with legislative and other requirements.</li> </ul>
Member School Principals	<ul style="list-style-type: none"> <li>• Promote a positive culture of safety and care for all;</li> <li>• Ensure their school has effective and appropriate ways to manage safeguarding and legal compliance;</li> <li>• Ensure the appointment of a Safeguarding Coordinator with appropriate skills and competency;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Ensure that their school's approach to safeguarding includes taking reasonable steps to protect people;</li> <li>• Ensure that reports to external parties are made in accordance with legislative and other requirements.</li> </ul>
Safeguarding Coordinators	<ul style="list-style-type: none"> <li>• Ensure that all staff, volunteers, partners and contractors are aware of relevant laws, policies, and procedures, including Sophia and relevant member school Code of Conduct and relevant Safeguarding Policy;</li> <li>• Ensure that all staff, volunteers, partners and contractors are aware of their obligations to report suspected incidents of abuse, neglect or exploitation;</li> <li>• Manage reports of abuse, neglect or exploitation;</li> <li>• Provide support to staff, volunteers and contractors as required to undertake their responsibilities under relevant Safeguarding Policy and related procedures.</li> </ul>
Member school leadership team members	<ul style="list-style-type: none"> <li>• Promote a positive culture of safety and care for all;</li> <li>• Implement relevant Safeguarding Policy in their area of responsibility;</li> <li>• Ensure that the risks of incidents have been considered in their area of responsibility;</li> <li>• Ensure that there are appropriate controls in place to prevent, detect and respond to incidents;</li> <li>• Facilitate the reporting of any suspected abuse, neglect or exploitation;</li> <li>• Take a survivor-centric approach to potential incidents or concerns raised, and ensure that any incident is dealt with transparently and accountably, in line with the Sophia Complaints Handling Policy</li> </ul>
Sophia personnel	<ul style="list-style-type: none"> <li>• Develop and maintain understanding of their responsibilities in relation to this Policy and related procedures, along with relevant laws and the Sophia Code of Conduct;</li> <li>• Comply with all requirements;</li> <li>• Report any incident or concern to the appropriate authority when it is reasonable to suspect that a person's safety or welfare is at risk;</li> <li>• Contribute to an environment that is supportive of everyone's emotional and physical safety.</li> </ul>
Member school personnel	<ul style="list-style-type: none"> <li>• Develop and maintain understanding of their responsibilities in relation to their local Safeguarding Policy and related procedures, along with relevant laws and their school Code of Conduct;</li> <li>• Comply with all requirements;</li> <li>• Report an incident or concern to the appropriate authority when it is reasonable to suspect that a person's safety or welfare is at risk;</li> <li>• Contribute to an environment that is supportive of everyone's emotional and physical safety.</li> </ul>
Partners and contractors	<ul style="list-style-type: none"> <li>• Implement the provisions of this Policy and related procedures in their dealings with Sophia and member schools;</li> <li>• Report any suspicion that an incident may have taken place, is taking place or could take place.</li> </ul>

## Related Legislation, Procedures and Documents

<b>Legislation</b>	<i>Child wellbeing &amp; Safety Act 2005 (Vic)</i> <i>Child, Youth &amp; Families Act 2005 (Vic)</i> <i>Children's Guardian Amendment (Child Safe Scheme) Act 2021 (NSW)</i> <i>Ministerial Order No. 1359 (Vic)</i> <i>Privacy Act 1988 (Cth)</i>
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<b>Procedures of this Policy</b>	Sophia Child Safety Commitment Statement Sophia Safeguarding Complaints Response Procedure		
<b>Documents/related Policies/Procedures</b>	Sophia Safeguarding Framework Sophia Safeguarding Committee Terms of Reference National Catholic Safeguarding Standards National Principles for Child Safe Organisations <a href="#">New South Wales Child Safe Standards</a> <a href="#">Victorian Child Safe Standards – Ministerial Order No. 1359</a>		
<b>Member school Policy/procedure</b>	<b><i>Kincoppal-Rose Bay</i></b>	<b><i>Sacre Coeur</i></b>	<b><i>Stuartholme</i></b>
	Child Safe Policy	Child Safeguarding Policy	Student Protection Policy
	Child Protection Policy	Child Safety Policy	Child & Youth Risk Management Strategy
		Child Safeguarding Commitment Statement	
		Child Safeguarding Committee TOR	