



Reporting on the Implementation of Recommendations by Major Institutions (Rec 17.3) **December 2020**

Section 1: Identifying the Institution

Name

Knox Grammar School

Location

2 Borambil Avenue, Wahroonga NSW 2076

Specific organisational category

Independent School, Uniting Church in Australia (NSW & ACT)

School Context and Values

FAITH WISDOM INTEGRITY COMPASSION COURAGE

Knox Grammar School is located at Wahroonga, Sydney. The history of Knox formally began in 1924 when it opened as a Presbyterian boys' school after founding members Reverend JJ Gilmore, William McIlraith, George and Robert Gillespie and Andrew Reid purchased what is now Gillespie Heritage House as the first Knox School Building.

Today Knox is a school of the Uniting Church of Australia. Knox values its strong heritage, its close relationship with parents and the local community and exceptionally high educational standards. Underpinning these values is a deep and lasting commitment to our students' future.

The School offers a range of educational and developmental opportunities for students from Pre-Kindergarten to Year 12.

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Knox has three campuses, Knox Preparatory School (boys, Kindergarten to Year 6), Wahroonga Prep (girls and boys, Pre-Kindergarten to Year 6) and the Senior School (boys, Years 7 to 12). In educating Knox students, we seek to develop their character and confidence and teach them to value commitment, actively recognise and reward those endeavours which lead to success, encourage innovation, and foster valued School traditions. Our secure environment and strong framework of values help our students to become valuable, responsible members of the wider community.

Many opportunities are available to challenge and enrich those who experience an education at Knox. At Knox, we strive to develop young men and women with a well-rounded education, encompassing an excellent curriculum and exceptional co-curricular opportunities. Our aim is to prepare students for a successful life beyond their Knox school years.

The School's vision is based on the premise that excellence comes when each boy and girl achieves his or her best in both the curricular and co-curricular environments and is well-prepared for their future beyond Knox. The School believes this vision can be realised within a supportive and stimulating educational environment that values and nurtures the wellbeing of its staff and students.

Knox Grammar School Statement Regarding the Royal Commission

In 2015, the *Royal Commission into Institutional Responses of Child Sexual Abuse* ("the Royal Commission") held a public hearing into the response of Knox and the Uniting Church in Australia between 1970 and 2012 to concerns raised about inappropriate conduct by a number of teachers towards students at Knox.

Following this public hearing, on 13 September 2016, the Headmaster at the time John Weeks issued the following statement:

Today the Royal Commission into Institutional Responses to Child Sexual Abuse's final report into Knox Grammar School was tabled in the Federal Parliament.

The report was an investigation into the School's response to incidents occurring between 1970 and 2003. Those incidents had resulted in an investigation in 2009 and the charging and later conviction of one current and four former teachers.

The findings of the report reflect the commentary which has been prevalent since 2009 through the court cases and public hearings of the Commission Knox welcomes that commentary and the recommendations, which despite relating to historic matters, have our full support.

In 2009, the School and the Uniting Church issued an unconditional apology to the survivor and we have since been working together on redress. We remain deeply sorry for the pain and suffering inflicted on these men in their childhoods, and commend them once again for their courage in coming forward.

Since becoming Headmaster in 2004, a number of initiatives have been introduced at Knox. These range from policies and procedures, to regular training and changed practices for teaching staff, to programmes for young people to know what is acceptable and that they are supported if there is a complaint to be made.

Whilst the tabling of the report represents the end of the Commission's role, it is not the end of our vigilance and commitment to ensure that the failures of the past are not repeated, and that as a community we work to ensure we never fail our young people again.

Knox Grammar School Child Protection Measures Post Royal Commission

In April 2018, Scott James took over the role of Headmaster at Knox Grammar School from John Weeks and has continued the School's strong commitment to child protection and student wellbeing.

This has included a major revision of child protection policies and procedures, ongoing child protection training, working together with child protection industry leaders such as Bravehearts and the Association of Independent Schools of NSW to improve and develop child safe standards and practices, improvements in boarding, a revision of employment screening and recruitment and reviews/improvements of governance of the Knox Grammar School Council.

A detailed analysis of compliance with the Child Safe Standards and the recommendations of the Royal Commission is below.

Section 2: General Reporting Against Recommendations Relevant to All Institutions

Theme 1: Making Institutions Child Safe

1. Measure 1.1: *New or Revised Code of Conduct, Policies and Procedures for Child Safe Institutions*

Report Volume:

Volumes 6 and 7

Recommendation(s) the measure is in response to:

Recommendations 6.6 and 7.8

Examples from the recommendations:

- All staff and volunteers comply with a Code of Conduct that sets out behavioural standards towards children, explains reporting requirements and handling complaints of child sexual abuse

- Requires all people working within the institution to undergo initial and periodic training in connection with the Code of Conduct, and
- Ongoing documentation of policies and procedures related to Child Safe Standards

Description of measures implemented to date:

Child Protection and Complaint Handling Policies

Staff and Volunteer Codes of Conduct set out standards of behaviour expected towards children, explain reporting requirements and handling complaints of child sexual abuse. All staff and volunteers are required to comply with these Codes of Conduct. The standards and other information in the Codes are re-enforced in the following policies and related documents:

- i. *Child Protection Handbook (policy)*
- ii. *Procedures for Handling Allegations of Staff Misconduct and Reportable Conduct*
- iii. *Complaints Handling Policy*
- iv. *Knox Report Service for Raising Matters of Serious Concern*

These policies and procedure documents are publicly available on the Knox Grammar School website <https://www.knox.nsw.edu.au/>.

The Child Protection Handbook is reviewed annually. The *Procedures for Handling Allegations of Staff Misconduct and Reportable Conduct* and the *Complaints Handling* were new/significantly revised in 2019. They were prepared following a review of the complaints handling processes and in response to changes introduced to the registration requirements for individual non-government schools.

The *Knox Report Service for Raising Matters of Serious Concern* was created in 2016. This policy documents the processes for making a complaint or report via the Knox Report Service, an external complaints and reporting system managed by Deloitte.

The policies cross reference reporting requirements and handling complaints of child sexual abuse.

Policies and procedures in this area are reviewed by the Deputy Headmaster and the Manager of Risk and Compliance.

Initial and Periodic Training: Code of Conduct and Child Protection

Employed staff are given a set of the School's policies including copies of the above Child Protection and Complaint Handling Policies. They must sign and return a form confirming they have read/understood all the policies. There is a separate tear out form for the *Child Protection Handbook*.

Volunteers must follow the *Volunteer Code of Conduct*. Subject to the nature of the volunteer work, volunteers may also receive an induction and initial training in child protection. In the School's conditions of enrolment, parents/guardians who have a child attending the school agree to comply with the Volunteer Code of Conduct.

Working with Children Check requirements and exemptions for volunteers are in keeping with legal requirements and follow the guidelines set out by the Office of the Children's Guardian.

In addition to the *Child Protection Handbook*, other child protection policies are reviewed at least annually and updated by the Deputy Headmaster and Manager of Risk and Compliance. The School also collaborates with Bravehearts which works through the procedures and the practical application of the policies. Bravehearts also provides ongoing online training. Compliance is monitored and followed up by Staff Services.

Work specifically undertaken in 2020 and prospective work that will be undertaken from 2021 to implement this measure:

From 2020 all new staff must complete initial training modules with Bravehearts before they commence their employment.

The *Knox Report Service for Raising Matters of Serious Concern* was reviewed in 2020 and will be amended in January 2021 to reflect changes to the School's legal structure.

The *Child Protection Handbook* was updated in December 2019. A further review will be done in December 2020 and updates will be completed in early 2021. There will be a particular emphasis on the Child Safe Standards and changes to the Reportable Conduct Scheme under the *Children's Guardian Act 2019 (NSW)*.

The introduction of the *Parent Code of Conduct* was initially planned for implementation in 2020, however was deferred to 2021 due to COVID-19 infection and control measures which severely curtailed parent involvement in school activities.

A review of the role of volunteers was also planned for 2020, has also been postponed until 2021. This review will aim to clarify the role of volunteers and decide who requires Working with Children Check Clearances. It will also look at induction and initial child protection training.

When the school operated in an online environment, the School created specific policies and procedures for remote learning. Child Protection measures were built into this for example online student safety measures and guidelines for teachers conducting lessons remotely.

A review of boarding policies and procedures was completed at the end of 2019 and content was added and updated. The whole handbook including policies and procedures is undergoing further review in preparation for 2021.

2. Measure 1.2: *Improvements to Institutional Responding and Reporting*

Report Volume

Volume 7

Recommendation(s) the measure is in response to:

Recommendation 7.7 and 7.8

- There is an effective complaint handling policy and procedure in place that sets out how the institutions should respond to complaints of child sexual abuse, and is understood by children, staff, volunteers and families

Description of measures implemented to date

Please see the list of child protection and complaints handling policies above.

Complaints are logged using a template and recorded in a central location. The Deputy Headmaster reviews the complaints and follows up until the complaint is resolved. Serious complaints are reported to the School Council and the status of ongoing complaints is reported monthly.

After a complaint is made, if appropriate Staff Services will conduct an investigation and audit of policies and procedures. A risk assessment is also completed.

Work specifically undertaken in 2020 and prospective work that will be undertaken from 2021 to implement this measure:

Please also see above.

3. Measure 1.3 *Improvements to Record Keeping and Information Sharing*

Report Volume:

Volume 8

Recommendation(s) the measure is in response to:

Recommendations 8.1 and 8.4

Example from the recommendations:

- Institutions should implement the Royal Commission’s principles for records and record keeping that responds to child sexual abuse occurring within institutions

Description of measures implemented to date:

- i. An increased understanding of the importance/significance of records and how to exercise good record keeping.*

Examples:

- There have been presentations to staff on the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse regarding record keeping
- Staff meetings include information regarding data breach

- ii. To ensure administrative and personnel records reflect qualifications, completion of mandatory training and Working with Children Check Clearances*

Example:

- A training and qualifications register has been implemented so Staff Services can identify staff who have not completed requirements
- An online boarding system has been introduced for casual staff, boarding staff and sport and co-curricular staff, capturing records of engagement and induction

- iii. To ensure staff make informed decisions regarding file management, retention and disposal and to limit risk of neglect or illegal activity*

Examples:

- Staff training in Records Information Management (RIM)
- Records of key personnel including email are backed up
- Digital records have access hierarchies
- Physical records are kept securely
- A custody register is maintained for archived physical records

iv. *To ensure records containing sensitive information are accessible and kept securely*

Examples:

- Archived physical student records, current staff records and past staff records are kept in locked areas with restricted access
- Highly sensitive student and staff files are removed to a location with even stricter access. All files are individually catalogued in a database and indexes are created. All documents relevant to the student or staff file are collected and kept together. Digital Folders are created for each person to ensure that digital files are easily accessible
- Physical and digital legal records have restricted access
- Counselling files are retained in a locked area with restricted access.
- Key records have been scanned. Key physical and digital records are kept on a server with restricted access
- Records are cross referenced
- A register of Ombudsman Notifications, Reports to the Office of the Children’s Guardian and Mandatory Reporting has been created
- A register of highly sensitive student and staff files has been created
- A full register of the location of sensitive and/or high-risk staff files has been created.
- A register of all staff who have worked at the School is being maintained and updated
- A register of all staff who have worked in boarding from 1924 has been created and is being updated
- Records which are being created by staff, but not covered by back-up procedures, have been identified and procedures introduced to ensure they are backed-up regularly by the School’s information technology team
- Workflow processes are being created to ensure that records are created and retained according to School procedures
- Important records such as Incident Reports and Investigations have been reviewed to ensure critical components such as date, file name, position or title are captured
- Review of investigations and incident reports have identified the need to include Risk Assessments as part of the procedures and those assessments need to be communicated to relevant stakeholders
- The record keeping procedures of the Student Management Officers have been reviewed and new processes will be introduced for digital record keeping and ensuring that incident reports are linked with relevant student records

- There is a Data Breach Response Plan in place
- v. *To ensure records are destroyed according to legislative requirements*

Examples:

- All current digital records are now permanently retained
- Physical personnel, student and legal files are permanently retained.
- Risk management procedures are implemented regarding security of files
- Disaster recovery plans are in place

Work specifically undertaken in 2020 and prospective prospective work that will be undertaken from 2021 to implement this measure:

- i. *Increase understanding of the importance/significance of records and how to exercise good record keeping*

Examples:

- Further revision of the RIM Policy
- RIM information in the Staff Handbook is to be updated to reflect current practice
- Staff brochure introducing RIM policy and procedures are to be made available
- Staff induction/training to include Records Management component
- Staff training program is being designed, for implementation
- Further work on records checklist for departing staff

- ii. *To ensure records are maintained as being in the ‘best interests of the child’*

Examples:

- The creation, maintenance and retention of records will be informed by the need to serve the ‘best interests’ of the students. To this end the School will aim to implement a system of record keeping which exceeds the requirements
- There will be a records survey to ensure the required records are created, maintained and retained

- iii. *To ensure staff make informed decisions regarding file management, retention and disposal and to limit risk of negligent or illegal activity*

Examples:

- New staff training is to include RIM
- RIM policy and procedures are being reviewed and will be republished
- Digital copies of RIM Policies and Procedures and Retention Schedule for Non-Government Schools will be available to all staff

Theme 2: Children’s Voices

Measure 2.1: *Children participate in all decisions that affect them*

Report Volume:

All relevant volumes and recommendations.

Recommendations:

Information about how children are able to express their views and how their voices have been incorporated into child safe practices, including the design of policy and decision-making.

Description of measures implemented to date:

There is a senior student leadership group. This is a forum for students to express their views to teachers, staff and the School Council on school practices. The senior student leadership group includes both day and boarding school students. Therefore, it is an opportunity for both day and boarding school students to express their views.

Every year the School conducts Stakeholder Satisfaction Surveys for the purpose of identifying the satisfaction, needs and views of students in years 7, 10 and 12, and the parents of students in Years 7 and 12.

The surveys are developed by MMG Education, and they provide deep insights into the attitudes, expectations, satisfaction, and loyalty of students and their parents.

Work specifically undertaken in 2020 and prospective work that will be undertaken post-2021 to implement this measure:

Student Portfolio leaders will be included in the design and development of child safe practices.

Section 3: Reporting Against Institutions Specific Recommendations

Report Volume:

Non-government schools Volume 13

Recommendations:

Volume 13, recommendations 13.1-13.8

Child Safe Standards (Chapter 5)

Recommendation 13.1

All schools should implement the Child Safe Standards identified by the Royal Commission

Description of measures implemented to date:

- The School is liaising with the Association of Independent Schools of NSW to provide professional advice, support and workshops in implementing the Child Safe Standards
- Child Protection is a standing item at School Council meetings and here, the Headmaster reports on child protection issues
- Bravehearts child protection training is available for all School Council members
- As mentioned above, all staff are required to undertake Bravehearts training
- Key staff members undertake specialist child protection training
- Also mentioned above there is a senior leadership group. This group considers school practices within both the day and boarding school contexts
- Any Knox student, staff member or member of the community may contact the Knox Report Service. This is an external service operated by Deloitte where anyone may report a matter of serious concern
- As mentioned above the School conducts a MMG survey for parents/members of the community. There are elements in this survey that relate to a safe campus and bullying
- The School has established a panel, to manage child protection incidents. By way of review, after these incidents have been managed the panel considers whether it is necessary to revise or modify child protection policies and procedures. The panel may also decide on further action to enhance/develop student wellbeing. For example, staff training, further education for boys and training for parents

- The School analyses child protection and incident data for trends and systemic issues. A database is maintained and reviewed by senior management. Actions and interventions have been instituted post the reviews to respond to emerging trends
- Applicants for teaching roles are required to complete at least one interview. Applicants must provide details/evidence of their education and qualifications
- Verbal and written reference checks are conducted. Records of these checks are kept on staff files. Reference checks include specific questions relating to child protection
- Letters of offer/employment contracts provide clear expectations about safety responsibilities
- The School has a diverse workforce that includes both men and women. Further, there are staff from culturally and linguistically diverse backgrounds
- The School has a staff member, the Head of Department, Justice and Stewardship, with a dedicated focus on diversity. The role aims to broaden the experiences of students in keeping with Uniting Church policies and teachings about diversity and inclusion. There are also partnerships with indigenous communities and interfaith groups
- The School offers scholarships for indigenous students via the Australian Indigenous Education Foundation. The Knox Grammar School Indigenous Program is focused on partnerships with local Aboriginal communities and the AECG (Aboriginal Education Consultative Group), cultural competency for staff, a Reconciliation Action Plan, cultural opportunities for indigenous students and mentoring by an Aboriginal Liaison Officer (employed at Knox in the boarding houses). There is an emphasis on refining a process of cultural mentoring as the School believes this is fundamental to individual success and wellbeing, as well as inspiring and informing their future goals.

Recommendation 13.2

State and territory independent oversight authorities responsible for implementing the Child Safe Standards (see Recommendation 6.10) should delegate to school registration authorities the responsibility for monitoring and enforcing the Child Safe Standards in government and non-government schools.

As a non-government school Knox Grammar School must be registered with NESAs. Further, it must abide by the *Education Act 1900*.

Recommendation 13.3

School registration authorities should place particular emphasis on monitoring government and non-government boarding schools to ensure they meet the Child Safe Standards. Policy guidance and practical support should be provided to all boarding schools to meet these standards, including advice on complaint handling.

The Boarding handbooks outline the School's boarding specific policy and procedure in the area of child protection. Boarding staff receive boarding specific child protection training.

The Boarding houses have their own particular informal and formal complaints handling procedures.

Work specifically undertaken in 2020 and prospective work that will be undertaken from 2021 to implement the above measures:

- The Association of Independent Schools of NSW presented a seminar to the School Executive 'Creating Safer Independent Schools'
 - Bravehearts presented to staff, addressing the Child Safe Standards
 - Recruitment of Bravehearts to institute stakeholder focus groups to ensure Child Safe Standards are being met with a specific focus on the following standards:
 - i. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously
 - ii. Families and communities are informed and involved in promoting child safety and wellbeing
 - Student reference group established to respond to the School's initiatives and approach in instituting child safe standards
- A review of boarding policies and procedures was conducted in 2019. The Boarding Handbooks for 2020 were updated. All of this material will be reviewed again in 2021 and there will be a focus on the informal and formal complaints handling procedures
- Development of a Child Protection Program Management Schedule. This is lodged and monitored in the school's policy and procedure site and overseen by the Deputy Headmaster, Students and Campus Heads
 - Establishment of a Child Protection Oversight Committee. This is chaired by the Deputy Headmaster, Students with leadership representatives from each campus, together with a Staff Services team member and the Head of Risk and Compliance. From 2021, the Committee will meet each term to:
 - Ensure training timelines are being met

- Conduct regular campus reviews to minimise risks of abuse in physical and online environments
- Child safety is embedded in organisational leadership, governance and culture
- Ensure parents and students are engaged with and updated on Child Safe practices
- Ensure campus practices reflect and promote the maintenance of a Child Safe environment
- Equip staff with the knowledge, skills and awareness to keep children safe through ongoing education and training
- People working with children are suitable and supported
- In 2021, the above work will continue

Case Study 23: Public Hearing into Knox Grammar School, Royal Commission into Institutional Responses to Child Sexual Abuse
Report of Case Study No. 23 dated June 2016

Description of measures implemented to date to address the findings in Report of Case Study No. 23:

i. Governance structure at Knox

Child protection is a standing item at School Council meetings and here the Headmaster provides a child protection report.

The *Knox Constitution* was reviewed, and an updated version approved by the Uniting Church in Australia (NSW & ACT) Synod in June 2018.

The *Knox Constitution* specifically sets out the roles and responsibilities of the Headmaster and Council. In particular, it refers to reports on key issues from the Headmaster to Council.

ii. Record Keeping Practices

Please see above.

Relevant material about teachers' conduct with students is systematically documented and kept securely with either Staff Services, the Headmaster, archives or legal counsel. It is accessible to any incoming Headmaster and/or other relevant senior staff.

The *Knox Constitution* requires the Secretary of the Knox Council to keep written records, to retain these records for the minimum period legally required and to take reasonable steps to ensure these records are kept safe.

Council records are retained indefinitely physically and digitally. Records are kept secure and require authorisation for access. Physical records are monitored by a Custody Register. Digital records are backed up regularly and access is controlled and can be monitored. All Council members are advised of information privacy and confidentiality.

iii. Recruitment practices for employees with direct contact with students (including boarding students)

Roles requiring direct contact with students, including boarding students involve a formal application process. Applicants are required to undergo an interview process and there are referee checks. Responses are documented and kept on staff files.

A Working with Children Check Clearance is required for employment of all staff and the engagement of many volunteers

Please also see above.

iv. Training/education for staff on mandatory reporting obligations imposed by legislation

Please see above.

v. Work specifically undertaken in 2020 and prospective work that will be undertaken from 2021 to address the findings in Report of Case Study 23:

The structure of the School Council and governance practices were reviewed by an external organisation in 2020. As a result, several changes were implemented. For example, the scope of the Audit and Finance Committee was expanded to include a Risk and Compliance component. A Nominations and Governance Committee was also created.

Separately, there was also a review of the School Council record keeping and reporting practices. Following this School Council meeting papers are now stored using a compliance software platform, designed specifically for Boards and governing bodies.

In January 2021 the School's legal structure will change and as a result there will be a new constitution, governance policies and documents. However, the above measures will carry forward.

In 2020, School Council members participated in training conducted by Bravehearts. This training was specifically tailored with a governance and child protection focus. This training will continue annually with a focus on the role of School Council/Board Members in promoting a child safe organisation.

Staff Services has reviewed referee and background checking practices for job applicants, in particular job applicants applying for roles with direct contact with students. As a result, it is now using an online reference checking platform to improve hiring processes.

As mentioned above in January 2021 there will be a further review of the *Knox Report Service of Serious Matters of Concern* to reflect changes in the School's legal structure.