



2020 Annual Progress Report
to the Australian Government
on implementing
Recommendations of the
Child Abuse Royal Commission

Section 1: Identifying the Institution

Name

Trinity Grammar School

Location

119 Prospect Road, Summer Hill NSW 2130

Specific Organisation Category

Independent Anglican School

The School

Trinity Grammar School is an Anglican foundation. The School is governed by a Council (appointed by ordinance of the Diocese of Sydney). The Archbishop of Sydney is President of the Trinity Grammar School Council.

The Right Reverend G.A. Chambers, O.B.E., D.D., subsequently Bishop of Central Tanganyika, founded the School in 1913 at Dulwich Hill – the Parish of Holy Trinity – of which he was the Rector. The main campus at Summer Hill, set in eight hectares of land, was purchased in 1926, and the property at Strathfield shortly afterwards.

The School consists of several separate but closely linked campuses. The Senior and Middle Schools (Years 7 to 12) and the Junior School (Years K to 6) are located at the Summer Hill Campus. The Preparatory School (Years Pre-K to 6) is located at the Strathfield Campus. The Field Studies Centre is located at Woollamia on the NSW South Coast.

Mission Statement

Trinity provides boys with a thoroughly Christian education in mind, body, and spirit.

Contact

Head Master

Mr Tim Bowden

(02) 9581 6020

headmaster@trinity.nsw.edu.au

Deputy Head Master – Policy & Strategy

Mr Craig Sandwell

(02) 9581 6000

csandwell@trinity.nsw.edu.au

Section 2: General reporting against recommendations relevant to all institutions

Theme 1: Making institutions child safe

Measure 1.1

Implementation of the National Principles for Child Safe Organisations / Child Safe Standards (or jurisdictional equivalent).

Report Volumes 6 & 7 | Recommendations 6.4 – 6.6, 7.8 include actions such as:

- Developing or revising a Code of Conduct and ensuring staff and volunteer compliance,
- Implementing and updating child safe policies and procedures,
- Maintaining training for staff and volunteers on their child safety obligations and behavioural expectations, and
- Maintaining risk management strategies for a child safe institution.

Description of measures implemented prior to December 2020

The School has in place a set of core documents that set out the standards of behaviour expected towards children for staff.

These include, without limitation:

- **Staff Code of Conduct**
Sets out the obligations in complying with the Schools Child Protection Policy, Professional and appropriate behaviour, Respect, Discrimination, Harassment and Workplace Safety, Duty of Care obligations, Relationships between Staff and Students, Reporting Obligations and Grievance Procedures. This Code also serves as a guide for the behaviour of contractors and volunteers.
- **Child Protection Policy**
Focuses specifically on how the School is committed to creating a Child Safe School and clearly articulates reportable conduct and keeping children safe requirements pertinent to staff.
- **A Safe Learning and Working Environment**
Provides guidance on creating a safe, supportive and caring environment, including staff, student and school community expectations, reporting obligations, investigation processes and pastoral care.
- **Pastoral Care Policies and Procedures**
Including Staff responsibilities, Welfare Guidelines and Programmes, Discipline Guidelines, School Expectations of Students, Life Skills Programmes, Cyber Safety, Grievance Procedures, and Investigation Processes.
- **Other (miscellaneous) policies and procedures**
Focus on Child Safety, Grounds Supervision, Critical Incidents, ICT infrastructure and Equipment Usages and Workplace Health and Safety.

The School's Child Safe Policies and Procedures are reviewed annually by the Deputy Head Master-Policy and Strategy.

In keeping with legal requirements and following the guidelines set out by the Office of the Children's Guardian (OCG), Working with Children Check requirements and exemptions for volunteers are completed before any employment or engagement.

New staff complete the NSW OCG Child Safe eLearning - Keeping Children Safe in Organisations, Child Protection Code of Conduct and Child Protection face-to-face training before the commencement of employment.

All staff are required to comply with these policies and procedures as a condition of employment. An annual declaration to evidence that they have read and agreed to abide by these policies and procedures is mandated.

Staff undertake an annual Child Protection and Code of Conduct briefing. Staff, contractors and volunteers engaged in any child-related capacity (paid or unpaid) are also required to undertake an Association of Independent Schools (AIS) NSW Child Protection Workshop every 3 Years.

Risk management procedures for all activities across the School have a child safety focus.

Prospective work that will be undertaken post-2020 to implement this measure:

- Update of policies, as required
Note - changes to NSW Legislation with the Introduction of the *Children's Guardian Act 2019* have required an update to the Child Protection Policy, Complaint Investigation Process and Code of Conduct.
- Develop further onboarding processes and training for Volunteers and a more specific Code of Conduct for Volunteers.
- Development of a Handbook for onboarding Contractors.

Measure 1.2

Improvements to institutional responding and reporting.

Report Volume 7 | Recommendations 7.7 and 7.8 include actions such as:

- Implementing and maintaining effective complaint handling policies and procedures that set out how the institution should respond to complaints of child sexual abuse,
- Ensuring these policies and procedures are understood by children, staff, volunteers and families, and
- Appropriate follow-up by the School after a complaint is made informed by a risk assessment framework that prioritises the safety of children.

Description of measures implemented prior to December 2020

The Complaint Investigation Process for Alleged Serious Misconduct by Staff outlines the school's complaint handling procedures regarding allegations of staff misconduct or reportable conduct.

The policy is reviewed annually, is publicly available on the School's website (as required by NESA Registration), sets clear guidelines and expectations for stakeholders regarding complaints or

allegations of staff misconduct or reportable conduct, makes clear the risk assessment process around any investigation, prioritises child safety and has appropriate timelines and clear reporting to outside agencies requirements, as required.

Staff are required to acknowledge that they have read and agree to abide by this Policy and any associated procedure(s) at the time of employment and annually thereafter.

The School's pastoral care structures and life skills programmes raise student awareness of raising allegations with appropriate pastoral staff. The School's e-Care email reporting system has also been in place for some time and students are educated as to how this enables them to raise concerns and report incidents that they would otherwise be reluctant to discuss in a face-to-face situation. This communication goes directly to one of the School's Psychologist.

The School's Grievance Procedure is available online for the School Community (as per NESAs requirements). Families receive a copy of the School Handbook annually which provides clear contact information and an explanation of processes should they wish to raise any complaints or concerns.

Prospective work that will be undertaken post-2020 to implement this measure:

Changes to investigation processes and training of staff will take place as a result of the variations between Child Protection investigations and Workplace Misconduct investigations.

Measure 1.3

Improvements to recordkeeping and information sharing.

Report Volume 8 | Recommendations 8.1 and 8.4 includes:

- Institutions should implement the Royal Commission's principles for records and recordkeeping to a level that respond to the risk of child sexual abuse occurring within institutions.

Recommendation 8.1

To allow for delayed disclosure of abuse by victims and take account of limitation periods for civil actions for child sexual abuse, institutions that engage in child-related work should retain, for at least 45 years, records relating to child sexual abuse that has occurred or is alleged to have occurred.

Recommendation 8.4

All institutions that engage in child-related work should implement the following principles for records and recordkeeping, to a level that responds to the risk of child sexual abuse occurring within the institution.

Principle 1: Creating and keeping full and accurate records relevant to child safety and wellbeing, including child sexual abuse, is in the best interests of children and should be an integral part of institutional leadership, governance and culture.

Principle 2: Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing, including child sexual abuse.

Principle 3: Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained appropriately.

Principle 4: Records relevant to child safety and wellbeing, including child sexual abuse, should only be disposed of in accordance with law or policy.

Principle 5: Individuals' existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent.

Description of measures implemented prior to December 2020

All records in relation to child sexual abuse are kept permanently.

All incident records of Child Protection Investigations are kept on the School's database and reported at each School Council meeting.

Investigation processes and record keeping follow the AIS NSW Guidelines for all child protection matters. This includes, Risk Assessments, investigations plans, records of interview and other evidence, recommendations, decisions and communications.

The School keeps employment records of staff including Working with Children Checks, Compliance training and records of any complaints and investigations they may have been involved in permanently.

As per the School's Privacy Policy, individuals have the right to access any personal information that the School has about them.

Prospective work that will be undertaken post 2020 to implement this measure:

Further development of a whole School Records Retention and Destruction Policy, including related processes, automated workflow plans and digitisation protocols.

Theme 2: Children's Voices

Measure 2.1

Children participate in decisions that affect them.

Volume 6 | Recommendations 6.5 and 6.6 includes:

- Information and examples 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 prior to December 2020

The School obtains both formal and informal feedback from students throughout the year that are taken into consideration by Heads of Campus and School Welfare Teams.

Specific to Primary years students, the School carries out the following:

- The Primary Well-Being Survey
- Trinity Action Group – student-led leadership and consultation group that meets twice a term;
- Student-led conferences (with staff and parents);
- Student Essential Agreements – class and whole School collective agreements on learning and behaviour.

Specific to Middle and Senior years students, the School carries out the following:

- School Leadership groups – provide feedback to the relevant Heads of School, Middle School (Years 7-9) Monitors and Whole School (Years 7-12) School Officers.
- ACER Social and Emotional Wellbeing Survey (Years 8-9)
- Direct feedback through individual House Tutor Groups – students undertake weekly pastoral care sessions with their House Tutors and Housemasters. NB: Years 7-12 comprise 96 individual Tutor Groups;
- Overnight activity feedback forms – all students in attendance are required to complete the forms to encourage them to raise issues;
- Year 11 surveys – conducted during the compulsory camp;
- Individual Year 12 Interviews conducted by the Head Master;
- eCare@trinity allows students to directly contact a School Psychologist via email.

Prospective work that will be undertaken post 2020 to implement this measure:

Two formal student survey processes will be introduced in 2021– one by the form of a weekly online check-in, the other will be a global student satisfaction survey, conducted biannually.

Section 3: Reporting for specific non-government institutions

Theme 13: Child Safe Standards

Schools

Volume 13 | Recommendation 13.1 includes:

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

Description of measures implemented prior to December 2020

In 2017 with the release of the final report by the Royal Commission into Institutional Responses to Child Sexual Abuse the School Council undertook an investigation into the School's practices specifically measured against the Recommendations set out in the final report and the Child Safe Standards.

In April 2018, the School Council endorsed and adopted the Child Safe Standards, which inform and shape the School's policies, procedures and operational practices.

The Head Master reports on and informs child protection related matters to the School Council at each Committee meeting.

The annual School Handbook outlines the Child Safe Standards and the School's commitment to them.

Recruitment processes have an emphasis on suitability for working with children evidenced by appropriate qualifications, compliances, and training. A Child Safe Standards briefing forms part of new staff induction.

The Child Safe Standards are reflected in all School Policy and Procedures.

The School's commitment to ongoing Child Protection training of its staff, contractors and volunteers is promoted by the School Council, Head Master and School Executive Staff in their fortitude to mandate the Child Safe Standards.

Prospective work that will be undertaken post 2020 to implement these measures:

Further work on embedding the Child Safe Standards in administration (Risk) will be carried out.

Detailed review of the School's risk assessment processes to further enhance its Child Safety Standards culture.

Volume 13 | Recommendation 13.2 includes:

- 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

Description of measures implemented prior to December 2020

Trinity Grammar School must be registered with the NSW Educational Standards Authority (NESA) and it must abide by the NSW *Education Act 1900*.

Under Section 3.6 of the NESA Accreditation and Registration Manual, registered non-government Schools must:

- provide a safe and supportive environment.
- have policies and procedures in place to ensure that it meets its legislative obligations in relation to child protection and have policies and procedures that provide for student welfare.

The School successfully completed the NESA registration process in 2019 for the 2020-2025 cycle.

Prospective work that will be undertaken post 2020 to implement this measure:

Continued review of NESA requirements.

Volume 13 | Recommendation 13.6 includes:

- Consistent with the Child Safe Standards, complaint handling policies for schools (see Recommendation 7.7) should include effective policies and procedures for managing complaints about children with harmful sexual behaviours.

Description of measures implemented prior to December 2020

The School has a clear statement about Sexualised Behaviour in its annual School Handbook. There are a significant number of Pastoral initiatives that enable it to capture complaints about harmful sexualised behaviours (as detailed previously in this report).

The *Guidelines for Investigating an Allegation of Significant Student Misconduct*, outlines how allegations are managed and the processes involved if a complaint reflects a harmful sexual behaviour (Reportable Conduct).

The School's Life Skills Programmes work towards educating students on appropriate behaviours.

All records are retained in accordance with the School's Policies (as detailed previously in this report).

Prospective work that will be undertaken post-2020 to implement this measure:

Further work on the current format of the School's Life Skills Programme will be carried out to ensure its content is succinct with legislative updates.

Case study 45: Problematic and harmful sexual behaviours of children in schools

Report of Case Study No. 45 [Oct 2017]

Case Study 45, insofar as it examined Trinity Grammar School, The King's School and Shalom Christian College, provided the Royal Commission with information about systemic issues within its Terms of Reference in the area of institutional response to concerns and allegations of problematic or harmful sexual behaviour by children in school settings.

In particular, the systemic issues raised in this case study by our examination of responses in these schools include:

- *responding to concerns, allegations and incidents of problematic or harmful sexual behaviour by children;*
- *monitoring and oversight of effectiveness of, and compliance with, school and government agency policies for responding to incidents of problematic or harmful sexual behaviour by children;*
- *reporting, regulation and oversight of schools and related institutions, including reporting to agencies such as Community Services and/or police;*
- *complaints handling; and*
- *mandatory reporting – in particular, reporting to police and Community Services.*

These systemic issues will be the subject of further discussion in the Royal Commission's final report.

Description of measures implemented in response to the issues raised.

Trinity Grammar School was included in Case Study 45. The School was before the commission regarding its response to an incident between students in its Boarding House in the year 2000.

As has been outlined in previous sections of this report, the School now has robust procedures that have responded to the issues raised by the commission in place. These procedures include, without limitation:

- Processes for handling allegations of problematic or harmful sexualised behaviour by children, including appropriate support mechanisms.
- Processes for reporting to appropriate government agencies in a timely manner, as required.
- Engagement with appropriate bodies, such as the AIS NSW, Office of Children's Guardian, in the development of policies and procedures.
- The increased training of pastoral staff as Child Protection Investigators.
- Annual training of all staff on mandatory reporting.
- Continued training of all staff, contractors and volunteers with respect to Child Safety.

The School discontinued Boarding in October 2019.