



Child Protection Policy

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Region: New Zealand

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Local Document Code (if applicable)	Associated documents Staff Code of Conduct Student Support and Child Protection Global Structure and Procedures Handbook NZQA Complaints Information Study Complaints Website	
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1. RATIONALE

The OSG NZ Leadership Team establishes policies and procedures to guide decisions made across the School in line with the OneSchool Global Ethos, Values and Vision. This Child Protection Policy provides a foundation within which students can be nurtured within a safe learning environment.

2. PURPOSE

- OSG NZ is committed to fulfilling its duty of care to all its students by;
 - Providing them with a learning environment that is safe, supportive and caring;
 - Seeking to recognise promptly when any of its students are at risk of significant harm; and
 - Taking appropriate action to protect its students when the School or its staff become aware that its students are at risk of significant harm.
- Accordingly, reportable conduct or other inappropriate or unprofessional behaviour by staff towards students will not be tolerated under any circumstances. The School expects all staff to honour the School's commitment in this Policy and to work with the School to achieve a safe learning environment.
- The School is committed to complying with its obligations under New Zealand and Argentina child protection legislation.
- The School recognises that there is a danger that its staff could be seriously affected by false, vexatious or misconceived allegations against them. The School is therefore also committed to investigating all allegations promptly and fairly.

- Text in bold and acronyms are explained in the final part of this document – Glossary of Terms.

3. SCOPE

Publication and distribution

- 3.1 This Policy is published and available to all School stakeholders digitally, and in hard-copy as requested.
- 3.2 This Policy will form part of the onboarding of staff as all staff are required by the School to comply with their obligations under it.
- 3.3 This Policy must be given to all trustees of OSG NZ/ARG
- 3.4 This Policy must also be given to:
 - 3.4.1 Any person who makes a Reportable Allegation; and
 - 3.4.2 Any person, being a member of the School community, who requests a copy.
- 3.5 This Policy should be shared with contractors, volunteers, or any other person that will be on School campus, or around students, or involved with School activities in any way.

4. SCOPE

Creating a Safe Learning Environment

- 4.1 The School and each Campus must create a safe learning environment. These will include educating all members of the School community about child protection issues.
- 4.2 All **staff** MUST follow the Child Protection Policy and Procedures.
- 4.3 All **reportable allegations** must be taken seriously.
- 4.4 The Child Protection Protocols developed by the School must be monitored continuously and reviewed regularly.
- 4.5 The School must provide professional development to meet the needs of the staff in implementing this Policy.
- 4.6 The CA and CP must:
 - 4.6.1 Promote this Policy within the School, with particular regard to the professional development needs of staff; and
 - 4.6.2 Monitor the Protocols to create a safe learning environment.
- 4.7 **NZ Staff** must:
 - 4.7.1 Be aware of the content of [New Zealand child protection legislation](#) as it relates to schools; and
 - 4.7.2 Report promptly in accordance with this policy whenever they:

4.7.2.1 have reasonable grounds to suspect that a student is at **risk of significant harm**; or

4.7.2.2 become aware of a **reportable allegation** against a **member of staff** whenever or wherever the **reportable conduct** took place.

4.8 ARG Staff must:

4.8.1.1 Argentina Staff must be aware of the ARG legislation around Child Protection as it relates to schools; and

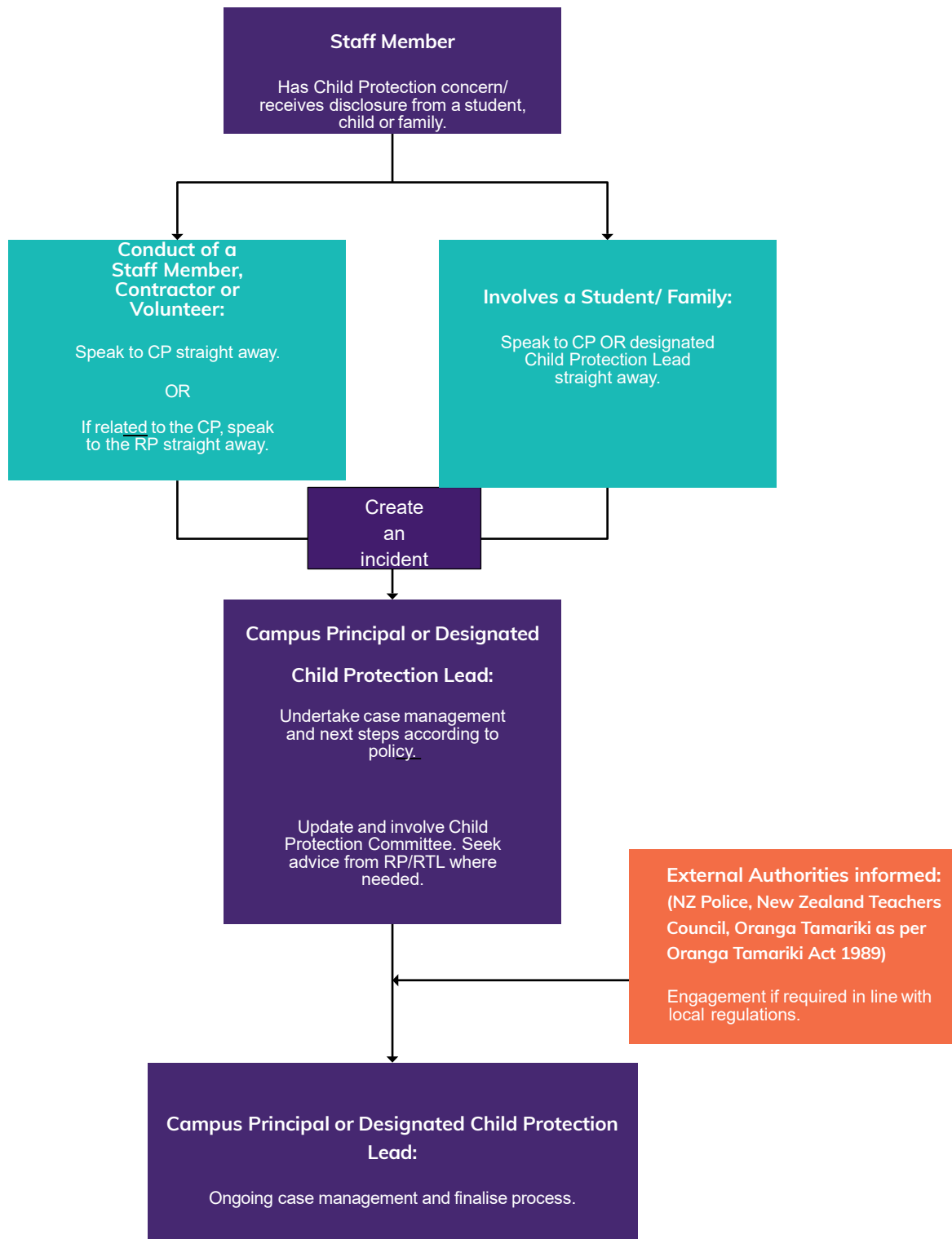
4.8.1.2 Report promptly in accordance with this policy whenever they

a. have reasonable grounds to suspect that a student is at **risk of significant harm**; or

b. become aware of a **reportable allegation** against a **member of staff** whenever or wherever the **reportable conduct** took place.

5. REPORTING OBLIGATIONS

All child protection records must be entered on CPOMS (Child Protection Online Management System).



6. CHILD PROTECTION AND SAFEGUARDING PROCEDURES:

- 6.1 Any **member of staff** to whom a **reportable allegation** is made or who becomes aware of a **reportable allegation** or **reportable conviction** must report this via CPOMS and in person to the CP and CA.
- 6.2 Any **member of staff** who has reasonable grounds to suspect that any student is at **risk of significant harm** must report the name, or a description, of the student and the grounds for suspecting that the student is at risk of **significant harm** to the CA/CP and make a report on CPOMS. In addition to this, the **member of staff** must satisfy himself or herself that the CP has reported the matter to the Regional Principal and that he has placed the matter in the appropriate hands.
- 6.3 Any **member of staff** who has reasonable grounds to suspect that a child who is not a student and who is under the age of 16 is at **risk of significant harm** and those grounds arise during the course of or from the **member of staff's** work must report the name, or a description, of the child and the grounds for suspecting that the child is at **risk of significant harm** to the Campus CA/CP and make an entry on CPOMS.
- 6.4 If the **reportable allegation** is against the CA or one of the Campus Board members, or if the student is at **risk of significant harm** from the CA or Board members, the report should be made on CPOMS and to the OSG NZ Board who must then comply with the obligations under this policy that would otherwise fall upon the CA.
- 6.5 When the CA receives a report from a **member of staff** under this section of this policy, the CA must, where required by local law, report the matter to the appropriate third party such as the Ombudsman. The CA should first consult with the RMD on whether and in what form to report the matter to a third party.
- 6.6 The CA must set up structures which make it easy for **staff** and other members of the School community to report to the CA **reportable allegations** or **reportable convictions** and situations in which they suspect that a student is at **risk of significant harm**. The CA must also educate the staff and the School community about these structures and actively encourage them to make use of these structures.
- 6.7 The CA must ensure that no person reporting to the CA under this section of this policy is disadvantaged as a result.

Role	Access Level	Responsibilities
Staff	Enter a report	Reporting and recording of concerns
Campus Principal – Designated Safeguarding Lead	View and manage case files. View thematic trends	Case management
Deputy Designated Safeguarding	View and manage case files	Support the CP with case management.

Lead – Staff Representative		
CA	View case files	Campus Child Protection Committee member. Auditing of process and quality
RP/RDE	View case files for relevant Campuses. View thematic trends.	Quality assurance and case advice
Regional Managing Director	View Case files and thematic trends	Legal responsibility for Child Protection at the Campus
Regional Director of Safeguarding	View Case files and thematic trends. Set up and manage users and user permissions.	Auditing of process and quality. Ensuring policy and procedures are followed.
Regional CPOMS Admin and IT	Set up and manage users and user permissions. System maintenance.	No case file access

7. ROLES & RESPONSIBILITIES

7.1 Child protection and safeguarding means:

- Protecting children from all forms of abuse and harm in the physical and digital environment.
- Identifying and stopping abuse and harm that might already be happening.
- Identifying the early signs of abuse and harm and intervening to protect children.
- Includes abuse and harm that is self-inflicted.
- Covers a range of abuse and harm, including bullying. A full list of categories of abuse and harm is found on CPOMS.

7.2 The Campus Principal is responsible and accountable for child protection at the Campus.

7.3 Child protection decisions are made by the Campus Principal (and

7.4 designated Child Protection Lead, if the post exists in a Campus) in liaison with the Campus Child Protection Committee.

Roles and Responsibilities - Campus
• Campus Principal: Ultimately responsible and accountable for child protection arrangements and effective use of policy and procedure at the Campus. Chairs the Campus Child Protection Committee. • Deputy Designated Safeguarding Lead – Staff Representative (DDSL): supports the CP in managing child protection arrangements and implementing policy and procedures. • CA: Sits on the Campus Child Protection Committee. Ensures the meeting and reporting cadence for the committee is kept to and all meeting minutes are securely recorded. Provides governance, support and challenge to the CP to ensure policy and procedure are applied effectively. Provide Community context to support case management. • Campus Board (CB): The CA should call on the Campus Board as required to work with disengaged families, and where additional community support or family care is needed. In this case, there must be approval from the Campus Principal to share information in line with information sharing laws.
Roles and Responsibilities - Region
• Regional Principals: Ensure OSG Child Protection Policy operates effectively under leadership from the CP. Provide audit reports and feedback to the CP about quality of child protection arrangements. Support the Campus Principal if advice is required, however this does not replace the requirement of reporting to relevant authorities. • Regional Director of Safeguarding: <u>Ensures consistent, lawful, and effective safeguarding and child protection policy, practice, training, governance, auditing, and reporting across all OSG New Zealand campuses, including reporting key trends and insights to regional and global governance bodies.</u> • Regional Team Leader (RTL): Advise CAs and CBs as required, using input from RPs and the Regional SME to ensure advice is aligned with this Child Protection Policy. • Regional Managing Director (RMD): Ultimately responsible for making sure the regional structure for child protection is correctly implemented. Sits on the Regional Child Protection Committee and has awareness of critical incidents that require additional input to learn lessons, improve systems and build confidence in the school.

8. RISK MANAGEMENT

8.1 Pending completion of any investigation (whether by the School or an external authority / third party), the School may limit the contact the **member of staff** is to have with students or other staff, direct the **member of staff** to undertake duties other than normal duties or at different locations or suspend the **member of staff** (but on normal pay).

8.2 Before taking such action, the School must consider what risk, if any, the **member of staff** might pose to students. The School must consider all relevant circumstances, including (but not limited to):

8.2.1 The nature of the allegation;

8.2.2 The vulnerability of the students (for example, because of their age);

8.2.3 The nature of the position occupied by the **member of staff**;

8.2.4 The extent to which the **member of staff** is supervised;

8.2.5 The disciplinary record of the **member of staff**;

8.2.6 The safety of the **member of staff**; and

8.2.7 The extent to which the investigation could be compromised by the **member of staff** continuing his or her normal duties.

8.3 Any action taken by the School under this section of the policy is not an indication that the School has made, or is likely to make, any particular findings in relation to the allegation against the **member of staff**. A fair and reasonable process will be followed to investigate the allegations.

9. INVESTIGATION

9.1 This section of the policy applies independent of any investigation that is being carried out by the Police, the Ministry of Education or another authority.

9.2 Investigations must be carried out in a way which affords procedural fairness to the **member of staff** involved. This means that, before completing an investigation of a **reportable allegation**, the **member of staff** should be informed of the substance of the allegation against them and provided them with a reasonable opportunity to put their case forward (if requested by the **member of staff**, with the assistance of a support person of the member of staff's choice).

9.3 Normally, the Regional Director of People & Culture and RDE decide the timing and the particular form this will take, ensuring the investigation is not compromised. It also means that the Regional Director of People & Culture and RDE must:

9.3.1 Act fairly and without bias;

9.3.2 Conduct an investigation without undue delay;

9.3.3 Ensure the case is not investigated or determined by someone with a conflict of interest;

9.3.4 Ensure the outcome is supported by evidence;

9.3.5 Take steps to maintain confidentiality for the sake of all parties involved in the investigation.

9.4 At the conclusion of the investigation, the Regional Director of People & Culture and RDE will communicate the outcome.

9.5 If it is found that the allegation against the member of staff is true, the School will follow its usual disciplinary process, and direct the member of staff to take the following actions:

9.5.1 If the breach is minor, resulting from a misunderstanding of how certain words or behaviour were understood, the School may require that the **member of staff** provide an apology and a commitment not to repeat the offence;

9.5.2 If the breach is more serious, the School may require that the member of staff provide one or all of the following:

9.5.2.1 An undertaking to attend counselling;

9.5.2.2 A written apology;

9.5.2.3 A commitment not to offend again; and

9.5.2.4 Any other action considered appropriate in the circumstances.

9.5.3 In the serious cases, the School may suspend or terminate the employment of the **member of staff**.

9.6 In most cases, the Regional Director of People & Culture should advise the victim and the **member of staff** in writing of the result of the investigation and the action taken. If the **member of staff** is unhappy with the conduct or result of investigation, they may take their complaint further to the OSG NZ Board and, if dissatisfied with the Board's response the Ministry of Education, the Police or any other relevant authority depending on the circumstances.

9.7 The Regional Director of People & Culture must, as soon as practicable after being satisfied that the investigation has been concluded:

9.7.1 Save copies of any reports to and of all relevant statements taken in the course of the investigation and of all other documents on which the report is based;

9.7.2 Where necessary provide the appropriate external agencies with such comments particularly in relation to Practising Teacher Criteria (PTC) (NZ and Argentina Ministry of Education Teaching Registration);

9.7.3 Inform relevant parties that appropriate action has been taken.

10. PASTORAL CARE

10.1 Where a student is at **risk of significant harm** or is the person to whom the **reportable conduct** has allegedly been directed, the School must as soon as possible advise the student's parents or caregivers.

10.1.1 The School may choose not to inform the student's parent or caregiver if the School is satisfied that it will not be in breach of its duty of care to the student or to other students by not advising the student's parents or caregivers.

10.2 The School will endeavour to:

10.2.1 Make available to any member of staff to whom a disclosure has been made, counselling and other support as required to:

10.2.1.1 Any student who is at risk of significant harm or is the person to whom reportable conduct has allegedly been directed; and

10.2.1.2 Any member of staff against whom a reportable allegation has been made; and

10.2.1.3 Where relevant, their families; and

10.2.1.4 Refer these people to external agencies able to provide relevant care and support.

11. EMPLOYMENT

- 11.1 The School must not engage any person (whether as an employee, volunteer, contractor, or otherwise) in child-related employment or activities without first requiring that person to disclose whether that person is a prohibited person. A police vet must be obtained as evidence of this and renewed every three years without exception. Child related employment or activities primarily involves direct contact with children where that contact is not directly supervised by another person having the capacity to direct the first person during the employment..
- 11.2 The School must not commence employing or enter into an arrangement with, or continue to employ or engage, in child-related employment or activities a person (whether as an employee, volunteer, contractor, or otherwise) that the School knows is a prohibited person.
- 11.3 If any person engaged as a volunteer, or otherwise becomes a **prohibited person** their engagement will be terminated immediately. A **member of staff** who becomes a **prohibited person** must immediately inform the School.
- 11.4 The School must carry out all the relevant procedures of background checking of a preferred applicant before employing or entering into an arrangement with that applicant in paid or unpaid child-related care. Further, some or all of the procedures of background checking may be deferred in a particular case if the School can establish that it was not reasonably practicable to carry out those procedures in the circumstances. In that case, those procedures are to be carried out as 0

12. IDENTIFYING ABUSE AND NEGLECT

Abuse includes **physical, emotional, sexual abuse, and neglect**

Possible physical indicators:

- Unexplained injuries (bruises, burns, fractures)
- Injuries with inconsistent explanations
- Frequent or untreated medical issues.

Possible emotional/behavioural indicators:

- Sudden withdrawal, anxiety, extreme fearfulness
- Aggressive or disruptive behaviour
- Significant changes in school performance or attendance.

Possible indicators of neglect:

- Chronic hunger, poor hygiene, inappropriate clothing
- Persistent tiredness or falling asleep in class
- Not receiving medical or dental care.

Possible indicators of sexual abuse:

- Age in-appropriate sexualized behaviour or knowledge
- Sudden fear of certain people or places
- Physical symptoms (pain, infections) with no clear medical cause.

13. RESPONDING TO DISCLOSURES

13.1 Notice and document

Staff should carefully observe and record signs, disclosures, or concerning patterns, including:

- What was seen or heard
- Who was present
- Dates, times and locations
- Exact words used if a disclosure is made
- Any actions taken by the observer
- Any other relevant information, such as the other children involved or at risk.

Observations should be based on fact and exclude any assumptions or opinions.

13.2 Respond calmly and supportively

If a child shares information:

- Listen without judgment or leading questions. Ask open questions such as “What happened next?”
- Reassure the child they’ve done the right thing telling you and that you believe them.
- Do NOT promise confidentiality – explain you may need to share this information to keep them safe.
- Prioritize the child’s safety at all times.

13.3 Follow the steps on the Reporting Flowchart

14. GLOSSARY OF TERMS

Note, these terms are defined for the purposes of this policy and should not be read as to limit the definitions to any actions. If any term is inconsistent with the regional legislation or requirements, the definitions in legislation will prevail.

Term	Definition
Act of Violence	Act of violence means an act or series of related acts that involves violent conduct committed by a member of staff in the course of employment, against or in the presence of a child.

Assault	Assault includes physical assault and sexual assault Actual physical harm does not have to occur for an assault to have taken place. That is, the child does not have to be injured. Physical contact which is an inevitable part of everyday life does not amount to an assault .
Background Checking	Background checking means any or all of the following procedures with respect to applicants, a member of staff , or to a person who has: 1) a check for any relevant criminal record of the person, for any relevant apprehended violence orders made against the person, for any child protection prohibition orders made against the person or for any relevant employment proceedings completed against the person, a) any other relevant probity check relating to the previous employment or other activities of the person, b) an estimate of the risk to students arising from anything disclosed by such a check, having regard to all the circumstances of the case, including any risk arising from the particular workplace, c) the disclosure of the results of any such check or estimate of risk to any person who determines whether the person is to be employed or continue to be employed (or to a person who advises or makes recommendations on the matter).
CA	Campus Administrator
CB	Campus Board
Child	Child means a person under the age of eighteen years or any persons attending OSG NZ as a student.
Child-related personal violence offence	Child-related personal violence offence means: 1) An offence committed by an adult involving intentionally wounding or causing grievous bodily harm to a child , or 2) An offence committed by an adult of attempting, or of conspiracy or incitement, to commit an offence referred to in paragraph 1) but does not include an offence committed by an adult who is not more than 3 years older than the child concerned.
CP	Campus Principal
CPOMS	Child Protection Online Monitoring System
Grooming Behaviour	Grooming behaviour means a pattern of behaviour aimed at engaging a child as a precursor to sexual abuse. The grooming process can include: 1) Persuading the child that a “special” relationship exists by spending inappropriate special time with the child , inappropriately giving gifts, showing special favours to them but no other children, allowing the child to overstep rules, etc.; 2) Testing of boundaries by undressing in front of the child , allowing the child to sit on the lap, talking about sex, “accidental” touching of genitals, etc. These behaviours may not indicate risk if occurring in isolation but, if there is a pattern of behaviour occurring, it may indicate grooming. Grooming behaviour constitutes a form of sexual misconduct .
P&C	People & Culture

Neglect	Neglect occurs when a child is harmed by the failure of a person whose job includes care responsibilities towards a child to provide basic physical and emotional necessities of life, including failure of such a person to provide or arrange for the provision of adequate and proper food, nursing, clothing, medical attention or lodging for a child in that person's care. 1) Of the investigation recorded under workplace employment procedures, or; 2) Conduct of a class or kind exempted from being reportable conduct by the Ombudsman.
OSG NZ	OneSchool Global New Zealand.
Prohibited person	Prohibited person means a person convicted of a serious sex offence, the murder of a child or a child-related personal violence offence or a person who is unable to produce an acceptable Police Vetting report.
Psychological harm	Psychological harm means significant emotional harm or trauma.
Relevant employment proceedings	Relevant employment proceedings, means proceedings (including disciplinary proceeding) in New Zealand or elsewhere, against a member of staff by the School or by a professional or other body that supervises the professional conduct of the member of staff, being proceedings involving: 1) Reportable conduct by the member of staff, or 2) Any child pornography offence or misconduct involving child pornography, or 3) Any child-related personal violence offence, or 4) Any offence with respect to filming for indecent purposes or installing devices to facilitate filming for indecent purposes committed against, with or in the presence of a child, or 5) An act of violence committed by the member of staff in the course of employment and in the presence of a child.
Reportable allegation	Reportable allegation means an allegation of reportable conduct against a person or an allegation of misconduct that may involve reportable conduct .
Reportable conduct	Reportable conduct means: 1) Any sexual offence, or sexual misconduct, committed against, with or in the presence of a child (including a child pornography offence), or; 2) Any assault, ill-treatment or neglect of a child, 3) Any behaviour that causes psychological harm to a child, whether or not, in any case, with the consent of the child. Reportable conduct does not extend to: Conduct that is reasonable for the purposes of the discipline, management or care of children, having regard to the age, maturity, health or other characteristics of the children and to any relevant codes of conduct or professional standards, For example the use of physical force that, in all the circumstances, is trivial or negligible such as: • providing appropriate medical care to a child who is hurt; • guiding a child by the shoulders, arms or hands; • actions found to have been appropriate physical contact in classes such as sport and drama. • Touching a child in order to attract a child's attention, or to comfort a

	distressed child .
Reportable conviction	Reportable conviction means a conviction (including a finding of guilt without the court proceeding to a conviction), in New Zealand or elsewhere, of an offence involving reportable conduct .
Risk of Significant Harm	A child is at risk of significant harm if current concerns exist for the safety, welfare or well-being of the child because of the presence, to a significant extent, of any one or more of the following circumstances: 1) The child's basic physical or psychological needs are not being met or are at risk of not being met, 2) The parents or other caregivers have not arranged and are unable or unwilling to arrange for the child to receive necessary medical care, 3) The child has been, or is at risk of being, physically or sexually abused or ill-treated, 4) The child is living in a household where there have been incidents of domestic violence and, as a consequence, the child is at risk of serious physical or psychological harm, 5) A parent or other caregiver has behaved in such a way towards the child that the child has suffered or is at risk of suffering serious psychological harm. Any such circumstances may relate to a single act or omission or to a series of acts or omissions. Physical or sexual abuse may include an assault and can exist despite the fact that consent has been given.
RDE	Regional Director of Education
RDS	Region Director of Sa
RMD	Regional Managing Director
RP	Regional Principal
School	The applicable OneSchool Global campus
Sexual assault	Sexual assault refers to a sexual offence against, with or in the presence of a child . It includes the involvement of children in sexual acts of acts of indecency and any sexual threat imposed on a child .
Sexual misconduct	Sexual misconduct includes a range of behaviors or a pattern of behaviour aimed at the involvement of children in sexual acts. Some of these behaviours may include: 1) Inappropriate conversations of a sexual nature, 2) Comments that express a desire to act in a sexual manner. 3) Unwarranted and inappropriate touching; sexual exhibitionism. 4) Personal correspondence (including electronic communication) with a child in respect of the adult's sexual feelings for a child. 5) Deliberate exposure of children to sexual behaviour of others including display of pornography. 6) Possession of child pornography in the workplace. 7) Grooming behaviour.
Staff or member of staff	Staff or member of staff includes any School employee and any individual engaged by the School to provide services to its students (even as a volunteer, student teacher, gap student, private tutor or contractor)

15. VERSION CONTROL

Document Code	Date	Version No.	Nature of Change
	June 2013	1.0	Initial Policy
	August 2013	1.1	Policy Review
	July 2016	1.2	Policy Review
POL-NZ-PAS-002.04	July 2019	2.0	Policy Rebrand
POL_NZ_PAS_v2.1	October 2020	2.1	Policy Review
POL_NZ_PAS_v3.0	October 2024	3.0	Policy Review and Update
POL_NZ_PAS_V3.1	May 2024	3.1	Policy Updated following Legal Review
POL_NZ_PAS_V3.1	March 2026	3.2	Policy Review and Update