

PUKAHA MOUNT BRUCE CHILD PROTECTION POLICY

Introduction

Pukaha Mount Bruce National Wildlife Centre is a national breeding facility for native rare and endangered species. It is also a tourism visitor facility with a large education component. Pukaha offers schools and public programmes to engage, advocate and educate for biodiversity and restoration. It offers schools programmes where teachers/caregivers/whanau are present and Junior Ranger programmes during school holidays when they are not.

Under the Vulnerable Children Act 2014¹, prescribed State services, district health boards, schools and those they contract and fund to provide children's services, are required to have child protection policies. As providers of services to schools, children and their families, and as a potential contract holder to the Ministry of Education (and potentially others), Pukaha Mount Bruce therefore must have a child protection policy.

What obligations do these organisations have?

- To adopt a policy and review that policy every three years.
- To make the policy available on a website maintained by the organisation.
- To ensure that every contract entered into for the provision of services to children requires the adoption of child protection policies by the individual(s) or organisations party to the agreement.

What must a child protection policy contain?

They must be written and contain provisions on the identification and reporting of child abuse and neglect.

Further detail and supporting information and resources about child protection policies and safer recruitment can be found on the Children's Action Plan website.²

Purpose

The purpose of this policy is to:

1. Outline the standards of behaviour relating to children by which all staff will abide.
2. Outline the action to be taken by Pukaha Mount Bruce and its staff to:
 - Keep staff safe.
 - Prevent/ minimise the risk of abuse of children while they are engaging with Pukaha Mount Bruce/ its staff.
 - Report any suspicion of any form of abuse or ill-treatment.
 - Respond to actual incidents of abuse, complaints, allegations or disclosure of abuse.
3. Establish what action is required when allegations are made against staff.

Scope

1. This Policy pertains to all staff, volunteers, contractors and professionals visiting from other organisations who are working with Pukaha Mount Bruce to provide services to children.
2. It has particular application to staff who have direct and/or frequent contact with children and young people.
3. This policy does not cover health and safety matters. These are covered in Pukaha Mount Bruce's Health and Safety Policy.

Definitions

¹ <http://www.legislation.govt.nz/act/public/2014/0040/latest/whole.html>

² <http://childrensactionplan.govt.nz/whats-new/childrens-workforce-guidelines-available/>

“Carer” for the purposes of this policy is given the same definition as “supervising adult” below.

“Child” means a boy or girl under the age of 14 years, “Young person” means a boy or girl of or over the age of 14 years but under 17 years; but does not include any person who is or has been married or in a civil union (Children, Young Person, and Their Families Act 1989, Section 2). In this policy “child” is considered inclusive of “young person”.

“Child Abuse” is separately defined in **Appendix 1**.

“Engage with” relates to people visiting an institution or public event run by Pukaha Mount Bruce or who are interacting with Pukaha Mount Bruce and its staff on site.

“Parent” for the purposes of this policy is given the same definition as “supervising adult” below.

“Staff” means people working at Pukaha Mount Bruce and includes employees, contactors, consultants, associates and volunteers whether working on a full time, part time, casual, temporary, paid or unpaid basis and includes professionals visiting from other agencies, working with Pukaha Mount Bruce.

“Staff who have direct and/or frequent contact with children” means visitor services staff, rangers and educators.

“Supervising adult” of a child or children means a responsible adult i.e. an accompanying parent, guardian, relative, family friend, carer, teacher, group or tour leader, and/or any adult acting as “parentis in loci”. For example, this could be a teacher leading a trip and remaining with a group, or a Pukaha Mount Bruce staff member during a holiday programme where children are left by caregivers.

Relevant legislation

Children, Young Person, and Their Families Act 1989

Crimes Act 1961

Privacy Act 1993 (Section 11)

Summary Offences Act 1981

UN Convention of the Rights of the Child

Vulnerable Children Act 2014

General Principles

At Pukaha Mount Bruce we believe that:

- The welfare of children and young people is important.
- All children and young people have the right to feel safe and comfortable in contact they have with Pukaha Mount Bruce.
- Pukaha Mount Bruce staff should be supported to work safely with children.

Policy

1. Pukaha Mount Bruce will take all practicable steps to ensure the safety and comfort of children and young people visiting its institutions or attending events and activities run by or under the auspices of Pukaha Mount Bruce.
2. The primary responsibility for the welfare of children at Pukaha Mount Bruce institutions or attending events and activities run by or under the auspices of Pukaha Mount Bruce rests with the supervising adult. Children under the age of 14 are required to be under the care of a supervising adult – this may a visiting teacher or caregiver. In certain circumstances, such as a holiday programme where caregivers are not present, a Pukaha Mount Bruce staff member may become the supervising adult.

3. Pukaha Mount Bruce staff and managers are expected to work together and to respond appropriately to any child protection issues. Reporting suspected cases to external authorities will only be done by the General Manager after checking all relevant information.
4. Pukaha Mount Bruce will **NOT** investigate allegations, complaints or disclosures but will refer them to the Ministry for Vulnerable Children Oranga Tamariki³ or the police for investigation.
5. Pukaha Mount Bruce and its staff will co-operate fully with investigations and assessments undertaken by the Ministry for Vulnerable Children Oranga Tamariki or the police.
6. Any sexual activity between an adult and child or young person will be regarded as a criminal offence and if this involves a staff member it will always be a matter for disciplinary action which may result in dismissal.
7. If there is a complaint using Pukaha Mount Bruce's customer complaint process or another channel which constitutes an allegation that raises a child protection issue, this will be referred directly to the General Manager who will following the process outlined in 3 above.

Creating a Safe Place (Prevention and Minimisation of Risk)

Pukaha Mount Bruce will ensure that:

- Appointment of staff to positions that have direct and/or frequent contact with children or young people will be conditional on a satisfactory police check, updated every five years.
- If an appointee has periods of longer than 6 months working overseas, they will be responsible for providing a police check from the countries in which those periods of work took place.
- Contractors or consultants who are working for Pukaha Mount Bruce and who are required to have direct and/or frequent contact with children or young people will be required to provide a satisfactory police check for themselves and / or any staff and sub-contractors working at Pukaha Mount Bruce, as a condition of their contractual arrangements.
- All staff are aware of the child protection policy and standards for safe working practice.
- All staff are trained to respond appropriately to situations which may present a child protection issue as appropriate to their potential work related contact with children and young persons.
- Staff are not placed in situations where they are in sole charge of a child or group of children under the age of 14, or assisting with the toileting or intimate care of children.
- Managers, service providers and any other interested parties are given information on relevant procedures and/or guidelines regarding the safety of children and young people while at Pukaha Mount Bruce or an event and activity run by or under the auspices of Pukaha Mount Bruce.
- Teachers, group leaders and primary carers are provided with information about Pukaha's expectations and their responsibilities regarding child protection while on site.

Responding and Reporting

A procedure for responding and reporting is outlined in Appendix 6 entitled **Receiving and Reporting Allegations of Abuse – Procedure**. Pukaha Mount Bruce will ensure that:

- There are procedures and guidelines for responding to and reporting concerns of potential or observed abuse, allegations, complaints or disclosures of child abuse.
- All staff, volunteers and contractors are aware of the Child Protection Policy procedures and guidelines and their roles and responsibilities.

³ <https://www.mvcot.govt.nz/>

Responsibilities

The following staff have these specific responsibilities under this policy. A procedure for responding and reporting is outlined in Appendix 6 entitled **Receiving and Reporting Allegations of Abuse - Procedure**

General Manager

- Monitor the operation of this policy and related procedures and guidelines, and review as needed to meet changes to legislation and ensure consistency of practice.
- Identify training and development opportunities for staff, volunteers and contractors as appropriate.
- Develop and maintain a secure file structure for recording issues and responses.
- Establish links with the relevant local agencies to ensure clear and effective communication.

Senior Manager/Supervisor

- Ensure that all staff expected to have direct and/or frequent contact with children or young people receive relevant training and are aware of, and meet their responsibilities.
- In consultation with the General Manager decide whether to refer any incident that may be considered child abuse to the Ministry for Vulnerable Children Oranga Tamariki and/or the Police.
- Exeditiously and sensitively manage allegations, suspicions or complaints of abuse against staff ensuring that all relevant policies and procedures are followed.
- Ensure that the General Manager is kept informed about any incident and the process being followed. The General Manager will keep the Board advised.
- Ensure that staff expected to have direct and/or frequent contact with children or young people receive relevant training and are made aware of, and have access to, relevant policy and associated guidelines and procedures.
- Ensure that all staff who have direct and/or frequent contact with children have been appropriately police checked, trained, and are aware of the response and reporting procedures.
- Report all incidents to the General Manager.
- Exeditiously and sensitively manage allegations, suspicions or complaints of abuse against staff ensuring that all relevant policies and procedures are followed.

Pukaha Mount Bruce Staff & Volunteers

- Meet all professional and legal obligations to children and young people according to safe working practices.
- Follow the policy, procedures and guidelines.
- Respond appropriately to lost or unaccompanied children or observations of abuse, complaints and disclosures, according to the following:
 - Guidelines for staff - Dealing with Lost or Unaccompanied Children
 - Procedure - Receiving and Reporting Allegations of Abuse
 - Guidelines for staff - Safely Responding to Observations, Allegations and Disclosures
- Report all incidents to their Supervisor/ Duty Manager who refers the matter to the General Manager.
- It is NOT the responsibility of Pukaha Mount Bruce staff to investigate suspicions, complaints or disclosures.

Related Policies/ Procedures / Forms

- Safe Working Practices – Guidelines for Staff (Appendix 2)
- Dealing with Lost or Unaccompanied Children - Guidelines for Staff (Appendix 3)

- Responsibilities of Teachers, Group Leaders, Parents and Carers of Children Visiting Pukaha Mount Bruce – Information
- Safely Responding to Observations Allegations and Disclosures – Guidelines for staff
- Receiving and Reporting Allegations of Abuse – Procedure
- Dealing with allegations made against members of staff regarding inappropriate actions with children – Procedure
- Child Abuse Reporting – Form

Breaches of the policy

Staff, volunteers, contractors and professionals visiting from other agencies who are working with Pukaha Mount Bruce who have direct and/or frequent contact with children or young people must be familiar with this policy. Breaches of this policy will be investigated and appropriate action will be taken which may include a disciplinary process that could result in dismissal if the breach is deemed to have placed a child or young person at risk or has resulted in a child abuse incident.

Training

All new staff will receive information appropriate to their position as part of their induction, including access to this policy.

All staff will receive appropriate and updated training or information as appropriate.

All staff who have direct or frequent contact with children and young people in the course of their work will be given appropriate training covering basic awareness of child abuse and protection. This will include understanding and following roles and responsibility of staff regarding child protection; responding to concerns of potential abuse, allegations, complaints or disclosures of child abuse; procedures for reporting a concern.

Review

The General Manager will initiate a review of this policy at least 3 yearly or more frequently as needed.

Appendix 1: Definition of Child Abuse

The Children, Young Persons and their Families Act, 1989, defines child abuse as "...the harming (whether physically, emotionally, sexually), ill-treatment, abuse, neglect, or deprivation of any child or young person". **The definitions set out below provide some indicators of abuse and these should not be seen as an exhaustive list or as a check list.**

Physical Abuse

Physical abuse is a non-accidental act on a child that results in physical harm. This includes, but is not limited to, beating, hitting, shaking, burning, drowning, suffocating, biting, poisoning or otherwise causing physical harm to a child. Physical abuse also involves the fabrication or inducing of illness.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effect on the child's emotional development. This can include a pattern of rejecting, degrading, ignoring, isolating, corrupting, exploiting or terrorising a child. It may also include age or developmentally inappropriate expectations being imposed on children. It also includes the seeing or hearing the ill treatment of others.

Sexual Abuse

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities (penetrative and non-penetrative, for example, rape, kissing, touching, masturbation) as well as non-contact acts such as involving children in the looking at or production of sexual images, sexual activities and sexual behaviours.

Staff should be aware of their 'duty of care' which precludes developing a sexual relationship with or grooming of a child. A sexual relationship between an adult and a child will always be wrong, unequal and unacceptable.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, causing long term serious harm to the child's health or development. It may also include neglect of a child's basic or emotional needs. Neglect is a lack: of action, emotion or basic needs.

Procedures Guidelines and Forms

- Safe Working Practices – Guidelines for Staff (Appendix 2)
- Dealing with Lost or Unaccompanied Children - Guidelines for Staff (Appendix 3)
- Responsibilities of Teachers, Group Leaders, Parents and Carers of Children Visiting Pukaha Mount Bruce – Information (Appendix 4)
- Safely Responding to Observations Allegations and Disclosures – Guidelines for staff (Appendix 5)
- Receiving and Reporting Allegations of Abuse – Procedure (Appendix 6)
- Dealing with allegations made against members of staff regarding inappropriate actions with children – Procedure (Appendix 7)
- Child Abuse Reporting – Form (Appendix 8)

Appendix 2: Safe Working Practices – Guidelines for Staff Working With Children

Adults should always maintain appropriate professional boundaries and avoid behaviour which might be misinterpreted by others. Adults who work with children must therefore act in a way that is considered to be safe practice.

The giving of gifts or rewards to children or young people should be part of a plan agreed with a line manager for supporting positive behaviour or recognising particular achievements.

Communication between children and adults, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phone, text or other messaging, emails, digital cameras, videos, web-cams, websites, social networking and blogs. Adults should not share any personal information with a child or young person. They should not request, or respond to, any personal information from the child or young person other than that which might be appropriate as part of their professional role. Adults should ensure that all communications are transparent and open to scrutiny.

Written consent from the supervising adult must be sought for all photographs taken of children or young people, whether they are intended for internal or external use. A child's permission should also be obtained should they be of an age to provide their permission. Only the child's first name should be used in any text.

Do not engage in physical contact with a child or young person. This includes any 'rough and tumble' or 'horseplay'. Do not physically restrain a child or young person except in exceptional circumstances i.e. to prevent injury or damage to property. At all times you must use the minimum restraint necessary.

When physical contact is made with a child this should be in response to their needs at the time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background. Adults should use their professional judgement at all times, observe and take note of the child's reaction or feelings and use a level of contact and/or form of communication which is acceptable to the child for the minimum amount of time necessary.

Plan to ensure that there are other staff within the vicinity or other supervising adults present when working with children. Avoid being in a closed area by yourself with a child.

Never accompany children to the toilet facilities or administer any intimate or personal care of the child or children. A supervising adult such as a teacher must be asked to do this.

Recognise that it is not your role to decide on or investigate concerns, allegations or complaints.

It is your role to:

- Pass on any concerns, allegations or complaints to a senior member of staff.
- Consistently apply these safe working practices guidelines and to advise a senior member of staff if you observe instances of non-compliance.

Appendix 3: Dealing with Lost or Unaccompanied Children - Guidelines for Staff

Lost Children

A lost child is defined as one who has become separated from their supervising adult who is currently onsite. They may identify themselves to staff, be found upset or distressed or a concern is raised by a member of staff.

In the event of a child being lost, staff will:

- Reassure the child that staff will assist in finding the supervising adult.
- Ask the child for a description of their supervising adult.
- Contact the Supervisor with information including name, age and description of child, where the child was found, name and description of supervising adult.
- If the supervising adult is not located the child should be accompanied to the Visitor Centre Reception. Inform other staff using the radio system
- Ask the child if they know their supervising adult's phone number or a relative's contact details.
- Try ringing the supervising adult.
- If the supervising adult is not located and any attempt at phone contact is unsuccessful, then consideration must be given to contacting the police.
- Once the supervising adult is located it is best practice to verify with the child or young person that the supervising adult is indeed who they say they are.

A supervising adult may raise a concern that they cannot locate a child in their care. In this event staff will:

- Obtain details of the child including name, age, school, physical description, where and when the child was last seen.
- Reassure the supervising adult. Inform them that most children are found within 10 minutes.
- Ensure that a cell phone number is obtained should the supervising adult wishes to look for their child themselves.
- Inform the Supervisor.
- Walk with the supervising adult and check the area in the immediate vicinity to locate the lost child.
- Identify when a sufficient time has passed with the child not being found. Once this is identified the Supervisor will inform the police. Where possible staff will remain with the supervising adult until the child is found, otherwise the supervising adult will be escorted to a central point such as the visitor services desk and asked to take a seat until the child is found or the police arrive.
- Once the child is located verify with the child or young person that the supervising adult is indeed who they say they are before reuniting them.

Unaccompanied Children

An unaccompanied child has no supervising adult onsite. If the child is under the age of 14 this child is considered to be abandoned with no provision for adequate supervision.

If it comes to the attention of a staff member that a child may be unaccompanied the staff member should:

- Ask the child for contact details of their supervising adult.
- Contact senior management who will make every effort to contact the supervising adult. If contact is successful then an arrangement must be made for the prompt collection of the child. Should contact with a supervising adult or other identified adult be unsuccessful then the police will be notified.
- Reassure the child that every effort is being made to identify an appropriate supervising adult to collect the child.
- Inform the supervising adult, on arrival to collect their child that children under the age of 14 must not be left unsupervised.
- If a supervisory adult cannot be located in a reasonable time, then the police should be informed and the child transferred into their care.

Older Children (eg 12 – 14 years)

There may be times when older children do not have a responsible adult obviously in attendance. If a staff member becomes aware of this they should consider the following:

- The perceived age of the children.
- Whether the children are upset causing upset to others.
- Whether there is provision for adequate supervision (able to contact a supervising adult access to food or the means to buy it, an understanding of when they will reconnect with the supervising adult).
- Whether the child or children are regularly at Pukaha Mount Bruce institutions, programmes or events without responsible adult supervision.

If the staff member is concerned about this they should speak to the General Manager who will make a decision as to whether to deal with this as an unaccompanied child issue.

Advice and Reporting

If in doubt the Supervisor should contact the General Manager. In the case of regular visits without supervision the matter will be brought to the attention of the General Manager to decide whether to refer the matter to the Ministry for Vulnerable Children Oranga Tamariki or the police.

Appendix 4: Responsibilities of Teachers, Group Leaders, Parents and Carers of Children Visiting Pukaha Mount Bruce

Responsibilities of the Supervising Adults

The primary responsibility for the welfare of children visiting Pukaha Mount Bruce rests with the carer, guardian, teacher or other adult who brought the child – or the staff member responsible for a programme where teachers and/or caregivers are not present, such as a holiday programme.

Children under the age of 14 are required to be under the care of a supervising adult at all times.

Supervising adults are required to:

- Remain in close vicinity of their child or children during their visit.
- Report any lost child or young person to a staff member.
- Accompany children to toilet facilities or administer any intimate care.

Pukaha Mount Bruce staff should not place themselves in a situation where they are in sole charge of a child or group of children under the age of 14 or assisting with the toileting or intimate care of children.

Responsibilities of Teachers or Group Leaders

The primary responsibility for the welfare and supervision of the children and young people remains at all times with the teachers and group leaders.

In bringing a group to a Pukaha Mount Bruce programme or event, teachers and group leaders are acknowledging that they have read and accepted these responsibilities.

Teachers and group leaders are required to:

- To book programmes and visits in advance in order to receive pre-visit information. Pukaha Mount Bruce provides a Risk Assessment Management Tool to enable schools and organisations to plan their visit to ensure the safety of children in their care.
- Inform their group to observe fire evacuation and other emergency procedures.
- In the case of an accident or emergency contact a member of staff.
- Remain with their class or group in order to provide supervision and manage the behaviour and interaction of the children.
- Report any lost child or young person to a staff member.
- Accompany children to toilet facilities or administer any intimate care.

Pukaha Mount Bruce staff should not place themselves in a situation where they are in sole charge of a child or group of children under the age of 14 or assisting with the toileting or intimate care of children.

Teachers and group leaders are responsible for the behaviour of children in their care. This includes **NOT**:

- Eating or drinking in areas other than designated areas for school parties to eat their own refreshments.
- Having in their possession or consuming alcoholic beverages outside designated areas.
- Using illegal drugs or smoking cigarettes on Pukaha Mount Bruce premises.
- Verbally or physically abuse or bully anyone, use bad language or make any sexist, racist or other offensive remarks toward any person or other group.
- Vandalising property.
- Leaving litter on Pukaha Mount Bruce premises.
- Entering areas that are restricted or cordoned off.

Consequences of inappropriate behaviour

In the event that a group member does not behave appropriately Pukaha Mount Bruce reserves the right to refuse admission and/or ask the group to leave.

Any concerns regarding the behaviour of a group member will be communicated with the teacher or group leader in charge. These concerns may also be reported directly to the school or organisation.

Pukaha Mount Bruce reserves the right to contact security or the police regarding concerning behaviour of a group member.

Child Protection Policy

A copy of Pukaha Mount Bruce's Child Protection Policy is available on our website: www.pukaha.org.nz

Appendix 5: Safely Responding to Observations, Allegations and Disclosures – Guidelines for Staff

Do not try to deal with observations, allegations or disclosures alone. Consult with your senior manager.

Always work in cooperation with the supervising adults who are present unless this compromises the safety of the child.

Handling Situations in which the Child is in Immediate Danger of Further Harm

Contact the General Manager as soon as possible. Contact the police if there is concern about the immediate safety of a child or young person or any other person involved.

Handling Concerns and Suspicions

It is unlikely that Pukaha Mount Bruce staff will spend enough time with a child to be able to form concerns or suspicions of potential child abuse. However if you are concerned or suspicious there are some things you can do to act on those feelings:

- Check in with the supervising adult if appropriate. This can be a simple question like: “Is that normal?” or “Is this child OK?”
- Check in with the child if appropriate. Again a simple open question such as: “How is it going?” or “Are you OK?”

You are not expected to seek a disclosure.

- If you have concerns or are unsure, make a note of your observations and the circumstances that triggered your concern and contact the General Manager to talk it through with them.

Handling Disclosures from a Child

Remember that making a disclosure or a complaint against someone in a position of power and authority is always difficult. The child may reconsider and express a wish to retract their allegation. At the outset it must be clearly communicated with the child and any adults that their concern is being taken seriously and will be responded to in accordance with Pukaha Mount Bruce’s Child Protection Policy.

It is important that you take what the child says seriously. This applies irrespective of the setting, or your own opinion on what the child is saying. If a child discloses information regarding actual or suspected child abuse:

- **Stay calm** - If a child sees that you are upset or not able to cope with what he or she is telling you he or she may not continue to tell you what has been happening or take back (i.e. retract) the original statements they have made.
- Listen and remember: listening is not questioning.
- Give time to the child to say what he/she wants without interrupting.
- Reassure him/her it was OK to tell.
- Tell the child that they are being taken seriously and that they are not to blame.
- Explain that you have to pass on to appropriate authorities what the child has told them as soon as you are aware that the child is making a disclosure.
- Give an age appropriate explanation to the child of what the child can expect to happen next.
- Record in writing the circumstances that prompted the disclosure and what was said as soon as possible, preferably immediately, using the child's own words where possible. Also record any clarifying questions and any action taken by you Include the date, time and place and who was present.
- While it would be of use to have some contact details, asking a list of questions will be daunting for the child so instead just glean and record what the child tells you (for instance their name, suburb school, first name of adult involved).

- As soon as possible contact the Supervisor/Duty Manager who can provide you with immediate and ongoing support to deal with the disclosure, notification of the Ministry for Vulnerable Children Oranga Tamariki and the police and management of all further actions arising from the disclosure.
- You must **not**:
 - Indicate that you disbelieve the child. Your facial expressions and your tone of voice are as important as what you say to the child.
 - Make the child repeat the story unnecessarily.
 - Try to correct, confront, change, challenge or influence what they say.
 - Promise to keep secrets.
 - Enquire in to the details of the alleged abuse.
 - Ask leading questions or ask questions in a way that introduces words, phrases, people's names or concepts.

Under no circumstances should you deal with the problem alone or attempt to conduct an investigation.

Reporting

Any incidents, concerns or suspicions must be reported following the procedures set out below.

Appendix 6: Receiving and Reporting Allegations of Abuse - Procedure

Receiving Allegations of Abuse

There are a number of ways or situations where concerns or allegation might be raised. These could include:

- A child or young person making a direct disclosure.
- A child may make an indirect disclosure e.g. through written or art work or through friends.
- Information may be reported to a member of staff.
- A staff member may hear or observe something about the child or their behaviour that causes them concern.
- A staff member may witness an incident which raises child protection concerns.
- There may be a report from colleagues or other agencies.
- An allegation or complaint may be made to a staff member or formally raised through the complaints process or an anonymous report.

Staff should, therefore, be alert and aware of the fact that a range of situations could give rise to concerns about child protection.

Responding to Reports or Disclosures

The guideline for safely responding to allegations and disclosures is set out below as per recommendations from the Children's Action Plan.

Reporting Procedures

All allegations, disclosures or concerns of potential abuse must be brought to the attention of the General Manager as soon as possible. This applies whether or not these relate to incidents prior to or while engaging with Pukaha and whether they relate to actions of staff or visitors. Staff reporting allegations, disclosures or concerns must accurately record in writing the facts as observed or conveyed including all conversations and actions taken.

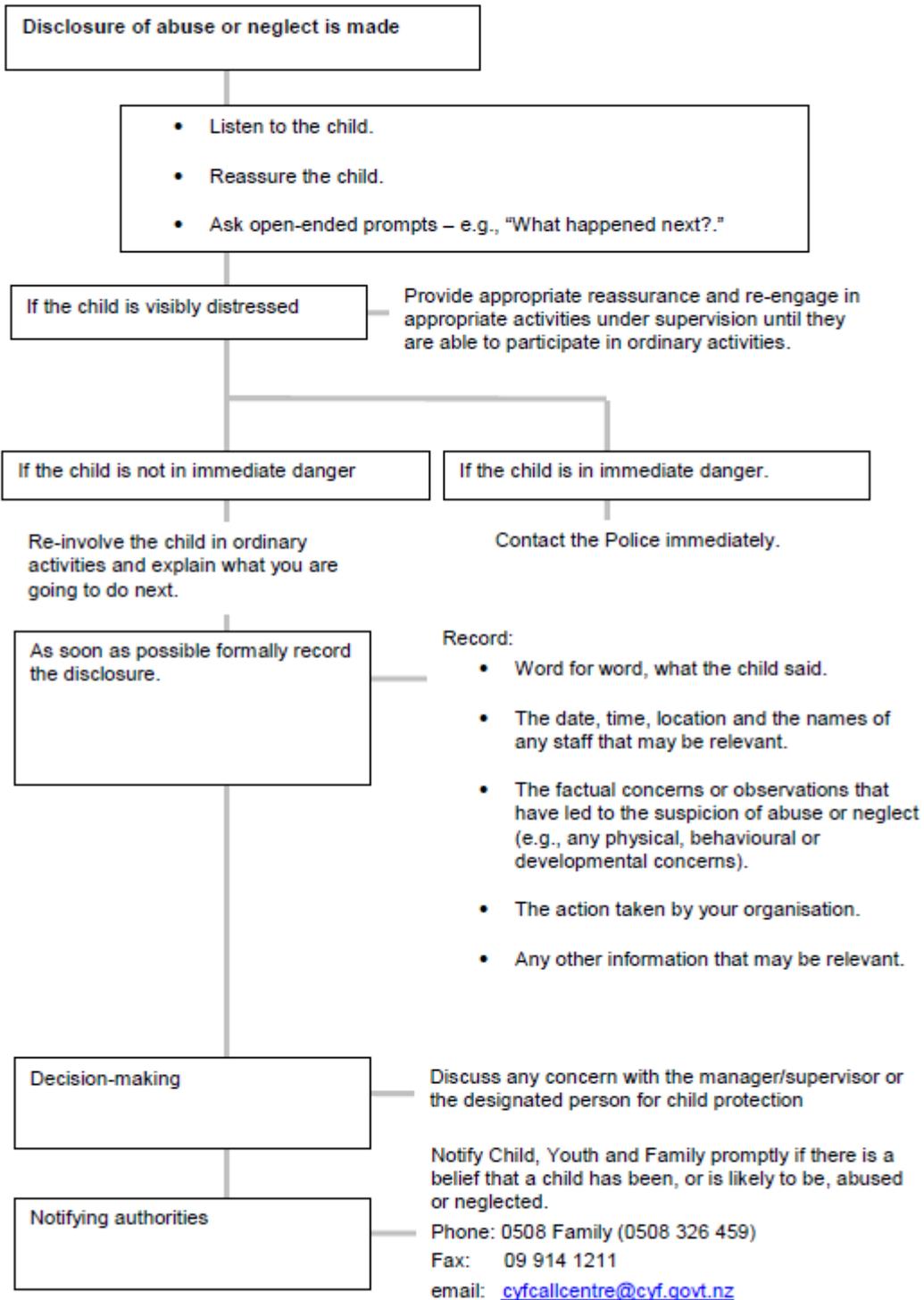
The General Manager will:

- Respond as soon as possible to any requests for support from members of staff who are dealing with a child protection issue (which may include responding to a disclosure).
- Establish and manage a confidential incident file.
- Involve the Ministry for Vulnerable Children Oranga Tamariki and the police where applicable.
- Provide appropriate feedback on the outcome to the staff member reporting the event.
- Make the Pukaha Mount Bruce Board aware as appropriate.
- Seek advice from the Ministry for Vulnerable Children Oranga Tamariki or the police if they are unsure if the concern that has been raised constitutes child abuse.
- Record in writing any decision not to proceed with notifying the Ministry for Vulnerable Children Oranga Tamariki or the police, and the reason and ensure this is placed on the incident file.

Keeping the Child's Family Informed and Involved

The supervising adult of the child will usually be informed of concerns by the General Manager. Any decision not to initially inform the supervising adult and the reason for it will be recorded in writing and placed on the incident file. Reasons for not initially informing the supervising adult may include:

- The supervising adult is the alleged perpetrator.
- It is possible that the child may be intimidated into silence.
- The child does not want their supervising adult involved and they are of an age when they are competent to make that decision.
- There is a strong likelihood that evidence will be destroyed.



Appendix 7: Dealing with Allegations made against Members of Staff Regarding Inappropriate Actions with Children – Procedure

Allegations, suspicions or complaints of abuse against staff (including includes employees, contactors, consultants, associates and volunteers whether working on a full time, part time, casual, temporary, paid or unpaid basis and includes professionals visiting from other agencies, working with Pukaha Mount Bruce) must be taken seriously and reported to the General Manager as soon as possible.

Pukaha Mount Bruce should deal with a complaint immediately, sensitively and expediently within the procedures outlined in this Section.

It is **NOT** the responsibility of any staff member to investigate allegations of child abuse; any investigation will be undertaken by the Ministry for Vulnerable Children Oranga Tamariki or the police .

If the police decide to undertake a criminal investigation then any member of staff against whom allegations have been made may be suspended, without prejudice, as a precautionary measure. It is important that no internal investigation is undertaken, and no evidence gathered that might prejudice the criminal investigation.

If there is insufficient evidence to pursue a criminal prosecution, then a disciplinary investigation may still be undertaken if there is "reasonable cause to suspect" that abuse may have occurred. The allegation may represent inappropriate behaviour of poor practice by a member of staff which needs to be considered under internal disciplinary procedures.

The General Manager will provide advice on any action to be taken in response to allegations against Pukaha Mount Bruce staff.

Appropriate disciplinary action will be pursued and may result in dismissal.

