

CHILD PROTECTION POLICY

ULINK COLLEGE GUANGZHOU ENGLISH

Revised on December 11, 18

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Preface

ULC's child protection policy is based upon the Law of the People's Republic of China on the Protection of Minors (2012 Amendment) and on the United Nations Convention on the Rights of the Child, of which China is a signatory.

Article 19- Protection from Abuse and Neglect

'Protect the child from all forms of maltreatment by parents or others responsible for the care of the child and establish appropriate social programs for the prevention of abuse and the treatment of victims'

Article 34- Sexual Exploitation

'Protect children from sexual exploitation and abuse, including prostitution and involvement in pornography'

When a child is enrolled at ULC, parents agree to work in partnership with our school and will abide by the child protection policy adopted by ULC. The Child Protection Policy has been created to ensure all stakeholders in our community are fully aware and understand our commitment to providing a safe learning environment and community.

Dear Parents,

ULink College, in keeping with the ULC mission and Vision, has adopted a Child Protection Policy to guide our staff and families in matters related to the health, safety and care of children in attendance at our school. This policy is so important to ULC that, as the Principal, I am required to send this letter to parents at the beginning of each school year reminding our community about this truly critical issue.

The ULC Child Protection Policy is based upon the Law of the People's Republic of China on the Protection of Minors (2012 Amendment) and on the United Nations Convention on the Rights of the Child, of which China is a signatory. The two key articles we wish to draw your attention to are:

Article 19 - Protection from abuse and neglect

The State shall protect the child from all forms of maltreatment by parents or others responsible or the care of the child and establish appropriate social programs for the prevention of abuse and the treatment of victims.

Article 34 - Sexual exploitation

The State shall protect children from sexual exploitation and abuse, including prostitution and involvement in pornography.

By enrolling your child at ULC, you agree to work in partnership with the school and abide by the policies adopted by the ULC Board. All of us at ULC want you to know that we genuinely value our partnership with you in providing for the safety and care of your children. It is for this reason that U Link College has endorsed a Child Protection Policy that defines the standards by which all ULC students will be treated with respect and dignity at all times.

The ULC Child Protection Policy:

As part of our overall educational programs and specific to our shared responsibility to educate children, to protect them, and to learn and grow in a safe environment, ULC will:

- 1) Provide age appropriate lessons for all grade levels to help students understand personal safety, needs and rights.
- 2) Provide materials and information sessions to help parents better understand our programs and policy.
- 3) Regularly train faculty to recognise and report issues of abuse and neglect.

We will work together with you at home to ensure that our children are safe and are knowledgeable about their rights and responsibilities to themselves and to each other so that they can grow and learn free of fear in a safe and supportive environment. I thank you for your support of our efforts and invite you to contact your School Counsellor or Principal regarding any specific questions, you may have in this regard.

Sincerely,
Tony Hickling
Principal

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Introduction

As part of the Child Protection Program provided by ULC, students are taught about being safe, healthy relationships and appropriate boundaries, recognising and reporting abuse and understanding protective strategies. The core message communicated in the policy is that we all have the right to be safe, and that we can help ourselves to be safe by talking to people we trust. These are skills that help students to protect themselves and to raise the awareness of what to do if they are ever concerned about how others are treating them.

Aims and Objectives

The Child Protection Policy at ULC incorporates the guiding mission and vision of the school. The main aims of the CP policy are:

- To protect all students from possible harm, abuse, exploitation, and neglect;
- To create a safe learning environment;
- To appropriately screen all new ULC staff during recruitment;
- To ensure that all members of staff have appropriate training in the protection of students;
- To outline the roles and responsibilities of key members of staff designated to the protection of students at ULC;
- To ensure all employees at ULC take responsibility for the safety of all students. This is a shared responsibility of which all members of staff must abide;
- To educate all students regarding their own personal safety (including safe use of digital media, appropriate touch, consent, their personal space and what to do when worried about these issues).

Consequences for breach of policy

Given child protection is central to our school mission and of the highest priority to all stakeholders, those who abuse or neglect a student will be prosecuted to the full extent of the law.

Definitions and Indicators of Neglect and Abuse

1. Sexual Abuse

Child sexual abuse is defined as the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and an adult or another child who, by age or development, is in a relationship of responsibility, trust or power; the activity is intended to gratify or satisfy the needs of the other person. Child sexual abuse involves a wide range of sexual activity including but not limited to:

Contact forms of sexual abuse such as:

- Fondling a child's genitals or getting a child to fondle the perpetrator;
- Rubbing the perpetrator's genitals against the body of a child;
- Masturbation;
- Oral sex:
- Vaginal and anal penetration.

Non-contact form of sexual abuse such as:

- Making sexual comments (verbal, letter, telephone, email, text);
- Voyeurism;
- Exposure to pornography;
- Perpetrator exposing parts of their body or the child's body;
- Inappropriate (sexual poses or nudity) photography of children.

Possible indicators of Sexual Abuse may include, but not limited to:

- Sexual knowledge, behaviours, or use of language not appropriate for the student's age;
- Unusual interpersonal relationship pattern
- Venereal disease or pregnancy;
- Evidence of physical trauma or bleeding to the oral, genital, or anal areas;
- Difficulty in walking or sitting.
- Refusing to change into PE clothes, fear of bathrooms;
- Not wanting to be alone with an individual;
- Regressive behaviours, or stranger anxiety;
- Showing fear or distrust of a particular adult;
- Any indicators of emotional abuse (see section 4) which may also relate to possible sexual abuse.

2. Grooming

Grooming is defined as behaviour in which a person deliberately tries to befriend a child, make an emotional connection, and manipulate them with the purpose of sexually abusing them. It occurs when an adult communicates, by words or conduct, with a student or with a person who has care, supervision or authority for the child with the intention of facilitating the child's involvement in sexual conduct, either with the groomer or another adult. This is often a long deliberate process that is hard to detect, as the behaviour can appear in the early stages to be caring and protective. Grooming can also occur online through digital technologies with the intention of gaining a young person's trust before engaging in sexual abuse.

Sexual offending by an adult against a child is rarely a random act by a stranger. It is commonly based on a relationship with the child that has been formed over time. The abuse is commonly well thought out and planned in advance. This occurs so that the child and his/her care givers will trust the offender and not suspect any intended wrongdoing. The establishment of a relationship of trust which is then misused is often very confusing and damaging to the child, who may not even immediately recognise what is happening to them as abuse.

Grooming behaviour is unlikely to be recognised when observed as a one-off event, but a pattern of grooming of the intended victim and/or the intended victim's care givers is likely to be recognised. Grooming will tend to develop in intensity over time. It will also tend to include elements of secrecy and concealment.

It is important to be aware of the types of behaviours that can be used in the process of grooming a child or young person, while remembering that some of the behaviours might equally reflect normal interactions based on genuine motives of care and concern. This is the reason that, for staff members, the observance of clear professional boundaries and transparency in the declaration of potential conflicts of interest is a vital part of the protection of children and of the professional integrity of staff members themselves.

Possible indicators of 'grooming' behaviour may include, but not limited to:

- befriending a vulnerable student;
- giving the student special attention;
- Has "favourite student or child" treating the student more favourably than others, for example with school work or in extracurricular activities, individual coaching;
- giving gifts to, or doing favours for, the student;
- sharing secrets with the student;

- arranging opportunities to be alone with the student;
- sending email or SMS messages of a personal nature;
- making personal comments to the student about sexuality or relationships;
- directing suggestive jokes, remarks or actions towards the student;
- acting as a substitute parent or confident of the student;
- befriending the student's family and visiting the family home;
- offering to babysit or provide transport; or
- Offering individual coaching or special help to the student.

3. Physical Abuse

Physical abuse is intentional physical injury to the child and can include but is not limited to striking, kicking, burning, or biting the child, or any action that results in a physical impairment of the child.

Possible indicators of Physical Abuse may include, but not limited to:

- Injuries that appear to be intentional or where a student has unexplained bruising;
- Welts, burns or lacerations;
- Anxiety about being in certain places;
- Refusal to discuss or improbable excuse given to explain injuries.

Physical abuse also includes committing acts that are cruel or inhumane regardless of observable injury.

Such acts may include, but are not limited to:

- Instances of extreme discipline demonstrating a disregard of a child's pain and/or mental suffering;
- Assaulting or criminally mistreating a child as defined by either the criminal code or school policy;
- Engaging in action or omissions resulting in injury to, or creating substantial risk to the physical or mental health or development of a child;
- Failing to take reasonable steps to prevent the occurrence of any of the above.

4. Emotional Abuse

Emotional abuse is any behaviour that impairs the child's physical, social, intellectual or emotional development, sense of self- worth, or self-esteem such as constant criticisms, continual coldness

from the parent or caregiver, threats, verbal rejection, name-calling, insults, ignoring, isolation on a regular basis. It also involves repeated exposure to family violence or being forced to participate in disagreements as a tool for spying or psychological pressure.

Possible indicators of Emotional Abuse may include, but not limited to:

- Delayed physical, social and emotional development and/or speech disorders
 - Highly anxious
 - Showing delayed speech or sudden speech disorder
 - Fear of new situations
 - Low self-esteem
 - Inappropriate emotional responses to painful situations
 - Drug, alcohol or other substance abuse
 - Chronic running away
 - Compulsive stealing
 - Obsessions or phobias
 - o Sudden under-achievement or lack of concentration
 - Persistent tiredness
 - Lying
- Self-harm, sucking, rocking, head banging;
- Destructive, inhibited or aggressive behaviour or play;
- Attention seeking or overly compliant behaviour;
- Reports of humiliation, intimidation and bizarre punishment;
- Anxiety about being in certain places;
- Social withdrawal;
- Psychosomatic complaint headaches, nausea, abdominal pain.

5. Neglect

Neglect is the persistent failure to meet a child's basic physical or physiological needs, likely to result in serious impairment of the child's health or development. Neglect includes any instance where a parent or guardian fails to provide for a child's basic needs within their own environment. This includes physical needs such as lack of food, shelter or appropriate supervision, and failure to provide adult guardianship such as leaving children unsupervised at home for extended periods of time. Neglect also includes failure to provide necessary medical or mental health treatment or permitting the child to use alcohol or other recreational drugs.

Possible indicators of Neglect may include, but not limited to:

- Cognitive or academic delays:
 - difficulties with attention
 - o Parents are uninterested in child's academic performance
 - Parents do not respond to repeated communications from the school
- Extreme lack of personal hygiene and medical care;
- Fatigue and hunger;
- Parents cannot be contacted in an emergency;
- Student may not want to go home for weekends.

The Child Protection Team

The protection of children is a collective community responsibility. The Leadership Team, including administration and school counsellors, are responsible for ensuring the appropriate policies and procedures are in place regarding the protection of children and promoting the welfare of students. They are not expected to be experts on child protection but are expected to take responsibility for the ULC child protection policy, practice, procedures and professional development.

Ultimately, the Principal is accountable for ensuring that a comprehensive child protection policy is communicated, an educational program for all students and faculty are in place, and reporting procedures for all faculty are followed.

The Counsellors are available as resources to help guide staff.

Responsibilities

- To ensure all members of staff are aware of ULC child protection procedures.
- To ensure the child protection policy is updated and reviewed annually.
- To liaise with outside agencies and where appropriate, build effective relationships with them.
- To have the skills to recognise and deal with child protection issues.
- To support the Principal in referring cases of suspected abuse or allegations to the relevant investigating agencies
- To initiate established protocol for reporting and investigation on any allegations of members of staff.
- To act as a source of advice, support, and expertise with regards to child protection within the school and/or refer to additional resources.

When students leave the school, Principals ensure their file is transferred to the new school
as soon as possible. If there is evidence that there is likely ongoing danger to the child, ULC
will share that with future schools.

The Principal will...

- Ensure the child protection policy is reviewed and updated annually.
- Communicate the school child protection policy to all stakeholders annually.
- Report on progress in child protection efforts at ULC to all stakeholders annually.

Communicating Concerns

It is the responsibility of all staff, faculty, and administrators to report suspicion that student abuse or neglect is occurring. Concerns should be raised with the Principal, Counsellor, Deputy Principal of Student Affairs, and nurse if required. In all cases, the Principal will be notified and it is the responsibility of the Principal to inform the counsellor any suspected case of child abuse or neglect.

Review and Update of the Policy

ULC Child Protection Policy should be reviewed and updated annually and any update and/or revise should be approved by the Board.

Accessibility of Policy

This policy should be translated into Chinese so that it is easily accessible and understood by all staff working at ULC and all parents and students. This policy must be accessible to all ULC staff in hard copy. The policy must be accessible to the parents and students via the ULC website and the appropriate handbooks for students and parents.

Procedures for Reporting Suspected Cases

In all cases of allegations/suspicions of abuse, a 'Ring the Bell' situation is declared. All suspicions of abuse/neglect must be made to the Principal or Counsellor immediately.

Step 1: Information gathering

When an individual reports abuse or there is reasonable cause to believe that abuse is
occurring, the individual must seek advice from the Principal or Counsellor immediately.

- The individual reporting will complete an incident report. part 1. (Appendix A.) form detailing the disclosure or observation after meeting with the Principal or Counsellor. The individual should refrain from interviewing the student.
- Principal and Counsellor will take initial steps to gather information regarding the reported incident.
- Observations of the student by the Counsellor, Principal or the designated student advocate may occur.
- Principal and Counsellor may form a school based response team with appropriate representatives (e.g. medical provider, homeroom supervisor).
- Further investigation may be conducted to ensure that information is documented factually and distributed exclusively for the response team.
- Staff members may be interviewed and information documented. Any substantiated conflicts of interests or declared interests should be disclosed at this time.
- Regular status reports will be provided by the Principal to the Chairman of the Board of ULC.

Step 2: Action Plan

Based on acquired information, a plan of action will be developed to assist the student and family. As deemed appropriate, the following actions may or may not occur:

- Meetings with family to present the school's concerns
- Referral of the student and family to external professional services.
- Consultation with the school lawyer or other external legal advisors.
- Consultation with Government agencies if required.
- Police involvement under circumstance when ULC is advised to do so.

Step 3: Follow up

Subsequent to a substantiated case of child abuse or neglect, Principal and Counsellor will maintain contact with the student and family to provide support and guidance as appropriate. The Principal/Counsellor will also provide the student's teachers with ongoing support and resource materials/strategies. The Counsellor will additionally maintain contact with outside therapists, updating on the progress of the child.

Whom to Report to and When

Most cases of suspected abuse or neglect will be handled by school counsellors, such as those involving:

Student relationships with peers;

- Parenting skills related to disciplining children at home;
- Student-parent relationships;
- Mental health issues such as depression, low self-esteem, grieving;

Some cases will be referred to outside resources, for example:

• Mental health issues such as depression, major anxiety, dissociation, suicide ideation;

Cases reported for investigation and outside resources:

- Severe and ongoing physical abuse, neglect, emotional abuse;
- Sexual abuse.

In extreme cases, when families do not stop the abuse or concerns remain about the safety of the child, reports could be made to:

- 110
- Referral made to social work services and/or_妇女儿童保护中心 for legal advice, and the counsellor is the key person to keep contact and updates;

In the event that the abuse or neglect allegation involves someone from outside the family, the same procedure will be followed, with the focus of the school's efforts to protect the child and work with the family.

If allegations made about ULC Staff

Where the concern is raised about a member of ULC staff causing abuse, the same procedures for reporting suspected cases of child abuse or neglect will be carried out, with the exception that the principal, not the counsellor, will take the lead through the steps.

If the allegation warrants that a student or students are in danger from potential harm, the suspected employee will be suspended from school duties until the investigation has been fully completed. This will not only protect students at ULC but also protect the employee from further allegations being raised. The school principal will use the ULC Code of Conduct as a reference document to determine allegation of staff abusing students.

After investigation by the Principal, further actions might include anything from a reprimand to termination of employment, at the Principal's discretion.

Guidelines for Responding to Disclosures

School staff are often the first people a student may tell when they are feeling unsafe. It is important for staff members to be aware of how students disclose and how to respond in the most appropriate manner. How a disclosure is handled can affect the child's self-concept, sense of shame and blame and long term prospects of recovery from abuse.

The abuse may have been perpetrated by another staff member or volunteer, an adult in the student's immediate or extended family, an unrelated adult or another child or young person or sibling. In some rare cases, abuse may be perpetrated by a stranger. Regardless of the relationship of the alleged perpetrator to the student, the guidelines for handling the disclosure in a sensitive manner are the same.

Privacy

- Maintain the privacy and confidentiality of all parties concerned. All documentation must be kept in a secure environment.
- When the Principal feels it is appropriate, the board of the school will be informed of the incident however privacy regarding identities should be upheld when possible.
- When appropriate, the response team may consult with external agencies. Privacy regarding identities should be upheld when possible.

If a student tells a staff member about being abused or harmed:

DO

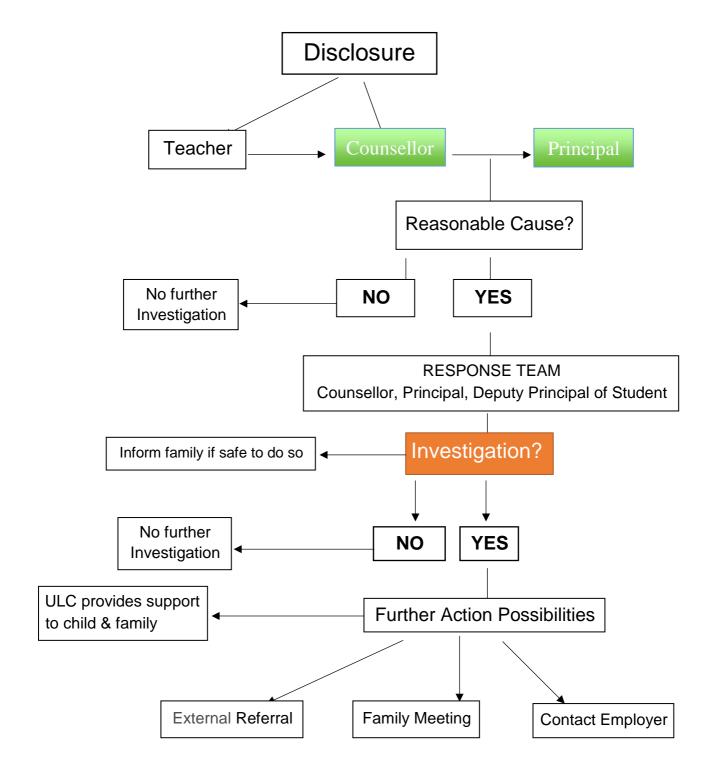
- Listen attentively, actively and without judgment;
- Let the student use their own words;
- Respond calmly and matter-of-factly. Even if the story that the student tells you is difficult to hear, it is important not to express disgust or alarm;
- Only question the student if absolutely necessary and restrict questions to open ended question such as 'Tell me what happened... and/or Tell me more about that...';
- In age appropriate language, reassure the student that he/she has done the right thing to tell. e.g. 'Thank you for sharing';
- Reassure the student that he/she is understood, what happened is not their fault, and the disclosure is being taken seriously;

- Be honest about your responsibility to take action: explain to the child what will happen
 next and that you must tell someone else to get help; they will need to talk with other
 people about the incident so that help can be sought;
- Be aware of the privacy issues involved;
- Provide pastoral support to the student;

DO NOT

- · React emotionally or accuse;
- Make judgmental or negative comments about the alleged perpetrator;
- Seek any more information than is absolutely necessary;
- Ask leading or probing questions. Your role is to listen, letting the child explain what happened in their own words;
- Make promises that you cannot keep particularly about not telling others such as the
 Principal or Counsellor. If you agree to keep a secret and then make a report, the child will
 view you as breaking your trust with them;
- Leave the student alone immediately after a disclosure;
- Discuss the situation with colleagues, parents, care givers or others (other than with those designated in these processes e.g. Principal or Counsellor).

Flow Chart for Disclosures



Documentation of cases of abuse

A written report (Appendix A. Part I) will be produced based on concerns raised by reporter and subsequently Principal and Counsellor. The report along with all subsequent documentation of the investigation will be kept in the student's confidential paper file with the registrar.

ULC will seek legal advice should a member of the school be approached on any case of child protection involving former students.

Code of Conduct

U Link College is committed to the safety and protection of students. This Code of Conduct applies to all staff, employees and volunteers who represent the school and who interact with students in both a direct and/or unsupervised capacity.

I promise to strictly follow the rules and guidelines in this Code of Conduct as a condition of my providing services to the students participating in ULC programs.

I will:

- Treat everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Never be alone with students in a private place with doors closed or at school activities without another adult being notified.
- Use positive reinforcement rather than criticism, competition, or comparison when working with students; Staff should be aware of the possible harm and misunderstanding associated with the use of sarcasm, especially with second language learners.
- Maintain appropriate physical boundaries at all times and touch students when necessary
 only in ways that are appropriate, public, and non-sexual.
- Comply with the mandatory reporting regulations of ULC and with the ULC Child Protection
 Policy to report suspected child abuse which is available on the ULC Website
- Cooperate fully in any investigation of abuse of students.

I will not:

- Have any special relationship with individual students;
- Touch or speak to a student in a sexual or other inappropriate manner.
- Inflict any physical or emotional abuse such as striking, spanking, shaking, dragging, slapping, humiliating, ridiculing, threatening, or degrading students.

- Smoke or use tobacco products, or possess, or be under the influence of alcohol or illegal drugs at any time while working with students.
- Transport a student home alone even with the knowledge of their parent or guardian.
- Give gifts to students even with the knowledge of their parents or guardians. Staff should never buy alcohol, drugs, cigarettes, videos, or reading material that is inappropriate and give it to students.
- Encourage students or parents to give gifts. I must inform a member of SLT if given a gift.
- Engage in private communications with students via text messaging, email, WeChat, Facebook, Twitter or similar forms of electronic or social media except for activities strictly involving school business/educational purpose. Electronic communication that takes place over a school network or platform may be subject to periodic monitoring.
- Use profanity in the presence of students at any time.
- Share any privileged information about students (demographic, locational, and photographic) outside of the school without written, expressed consent.
- Access, produce, publish or share material that is offensive by nature. This includes
 obscene, discriminating, illegal, profane, lewd, vulgar, rude, inflammatory,
 threatening, disrespectful, or sexually suggestive language or images, including
 images of exposed private body parts,
- Harass, insult or perform any offensive action to others in digital form including email, Wechat, and messaging.

I understand that as a person working with and/or providing services to students under the auspice
of ULC, I am subject to a criminal history background check.

Name:	Signature/Date:

Use of Digital Media

Given the developing and prevalent use of social and digital media in schools and amongst school age children, ULC will provide comprehensive education on a student's rights and responsibility in use of technology with an attentiveness to child protection issues.

In the normal course of facilitating the educational and co-curricular program offerings at the school, staff may be in possession of digital media with images of students. ULC staff will always use their best professional judgment when using/sharing such images, with "declared professional intent."

Screening/Recruitment

Appendix B.

Education and Training

Staff

To ensure that all members of staff feel confident in understanding their roles and responsibilities with regards to protecting students, all employees will receive mandatory training in child protection. Training will be conducted in-house if the expertise is available. Alternatively, an external agency will be sought to train all staff members.

i) New Staff

All new ULC staff will receive appropriate training in child protection as part of their induction to the school. This training will include at least the following:

- How to identify abuse and what to do if abuse is suspected.
- When to consider referring a case and who to refer to.
- Knowledge of what the school Child Protection Policy is and who to report to.

ii) Returning Staff

For staff currently employed within ULC, all staff will attend any relevant or refresher training courses. All staff will be provided updated training annually.

iii) Non-Teaching Staff

All non-teaching staff must be trained in basic child protection as child protection is everyone's responsibility. This includes office staff, nurses, RAs, cleaners, food service workers, school drivers, gardeners and property management from Linked. Training will be completed in Chinese for non-teaching local staff.

Students

In order to provide students with adequate tools to resist the overtures of potential offenders, all students must be educated about the main concepts of school child protection policy and supporting resources as part of their PSHE programme.

Parents

Child protection at school is a partnership with parents. At enrolment or annually, parents are required to sign a contract that states basic needs that parents will meet. Parents will have the opportunity to attend Parent Class and Parent Day presentations, in which training about child protection policy will be provided. Concepts to include:

- Understanding of specific policy and procedures of the school;
- Train to awareness of the issue including signs and symptoms of abuse;
- Inform parents of community resources for parents and to be used by school;
- · Provide parents with information for how to keep their children safe.

Community Partnerships

We form a community of international schools in the region and of authority, support services and professionals. The main purpose of the group is to connect to supportive resources, local legal and medical authority. (Appendix C)

Appendices

Appendix A.

Suspected Child Abuse/Neglect Incident Report, Part I.

According to ULC Child Protection Policy, Part I of this form is intended to be completed by the reporter, handed to the principal/counsellor, and kept on file in the registrar's office.

Name of Student			
Name of Alleged Perpetrator			
Name of Reporter			
Date of Incident		Time of Incident	
Place of Incident		Witness(es) to Incident	
Description of Incident: (Name and extent of the current injury to the student, and circumstances leading to the suspicion this student is a victim of abuse/neglect.)			
Date	Signature		

Suspected Child Abuse/Neglect Incident Report, Part II.

According to ULC Child Protection Policy, Part II is intended to be completed and updated by a school counsellor or the principal, and kept on file in the registrar's office.

□ Yes □ No	
Date and time	Name and position
	□ No

Appendix B. ULink College Recruitment Policy

Appendix C. Community Resources

Appendix D. Child Protection Policy Annual Calendar of Activities