



## **Supervision of Students on School Sites**

The ACT Council of Parents & Citizens Associations (Council) appreciates the opportunity to comment on the Education & Training Directorate's (ETD) draft supervision of students on school sites policy and guidelines.

Council supports a comprehensive policy on the supervision of students and is pleased that the current policy is being updated.

### **POLICY DOCUMENT**

#### *Policy Statement*

Regarding section 1.6, Council seeks clarification on how principals will inform students and parents about arrangements for supervision. Although this requirement is outlined in the guidelines, Council would like to see this point expanded to be more specific. In what way will the arrangements be communicated?

The arrangements are of direct concern to students and parents. Measures should be taken to ensure that this information is readily accessible. For example, uploading these procedures on the internet will improve transparency and allow the information to be quickly obtained by those who wish to see it (rather than having to request the information through the school administration).

#### *Definitions*

Council questions the definition of parents in the policy document. Currently, the policy defines parents as "all people who have parental responsibility for a child". Parental is a word which has specific connotations. Council would like to make sure that legal guardians are not excluded from this definition, or at the very least there is not the perception of this.

#### *Procedures*

Council notes the policy gives detailed consideration of supervision arrangements before school. Specifically, it is a requirement that playgrounds and buildings are

properly and adequately supervised. Much of the specific requirements have been lifted from the existing policy.

However, when it comes to the supervision of students after school hours, the policy notes that this is only required “in some circumstances”.

Whilst not directly attacking or questioning this policy, Council seeks clarification on why an extensive mandatory procedure is outlined for before school, yet after school supervision is neither mandatory nor extensively regulated.

## GUIDELINES

- Council believes that the size of a school should not drastically influence the way in which students are supervised. Section 4 of the guidelines state that “in smaller primary schools, supervision may involve observation of students from a point in the school that provides ready access to the students.” Council believes that this is poorly drafted as it logically implies that the (ill-defined) smaller primary schools have no requirement to assign a teacher to supervise students. Council sees the observation of students as requiring visible contact and a degree of physical placement. The vague nature of this point should be clarified.
- Council would like to see the wording used in section 5 of the guidelines reassessed. Specifically, it states that a “higher standard of care is required from a teacher for younger students and those students with disabilities, since it could be anticipated that these students are less able to understand and/or retain instructions than other students.”

Council questions whether this is the best phrasing to use. Although some students with a disability may be less able to understand and retain instructions, this is not always the case (a student may have a physical disability which in no way affects their mental capacity).

On a similar note, the guidelines account for students who are less experienced, however no mention is made of students who may have physical disabilities or health problems. Council would expect that a higher standard of care is required when dealing with these students as well.

- Some of the language used in the guidelines appears legalistic and formal. While this is completely understandable, Council would appreciate if the document was reconceptualised, placing a focus on the safety of students, rather than the risk management angle which is currently at the fore. For example, in section 6 under the ‘Teachers’ heading it states: “To avoid the possibility of negligence claims against the Directorate, the following general principles are suggested”. Council believes that this sentence should place an

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for Parent & Citizen Associations in the ACT.

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emphasis on the safety of students first. If students are adequately and safely supervised, there is no need for a negligence claim in the first place.

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