



CHILD SAFE POLICY

Reviewed : 26/3/2020

Ratified: 13/5/2020

POLICY

Fairhills High School is committed to promoting and protecting the interests, wellbeing and safety of all children. We have a zero tolerance for any form of child abuse.

Everyone working at Fairhills High School and within the school environment is responsible for the care and protection of children and for immediately reporting information about child abuse.

See **Appendix 1- "What is Child Abuse?"** for an outline of what constitutes child abuse.

PURPOSE

This policy sets out the school's approach to creating a child safe organisation where children and young people are safe and feel safe; and provides the policy framework for the school's approach to the Child Safe Standards (as outlined in **Ministerial Order No. 870 – Child Safe Standards - Managing the risk of child abuse in schools**. The order provides relevant definitions of key terms.)

The purpose of this policy is

1. To facilitate the prevention of child abuse occurring within Fairhills High School.
2. To clearly develop and maintain an organisational culture of child safety.
3. To make a clear statement to all staff, volunteers, contractors and the entire school community that any form of child abuse will not be tolerated.
4. To ensure that all parties are aware of their responsibilities for identifying possible occasions for child abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs.
5. To provide guidance to all staff or volunteers (including partner organisations that work with our children), and the whole school community, as to the expected behaviours (see **Appendix 2 - "Child Safe Code of Conduct"**) and the action that should be taken where they suspect any abuse within or outside of Fairhills High School.
6. To provide assurance that any and all suspected abuse will be reported and fully investigated.

SCOPE

This policy applies to all staff, volunteers, and contractors in the school environment, whether or not they work in direct contact with children or young people. This policy also applies to school council members where indicated.

The policy will apply to the school environment (see Appendix 2 - Definitions). The policy covers both school hours and outside of school hours.

CHILD SAFETY PRINCIPLES

In its planning, decision-making and operations, Fairhills High School will:

1. Take a preventative, proactive and participatory approach to child safety;
2. Value and empower children to participate in decisions which affect their lives;
3. Foster a culture of openness that supports all persons to safely disclose risks of harm to children;
4. Respect diversity in cultures and child rearing practices while keeping child safety paramount;
5. Provide written guidance on appropriate conduct and behaviour towards children;
6. Engage only the most suitable people to work with children and have high quality staff and volunteer supervision and professional development;
7. Ensure children know who to talk with if they are worried or are feeling unsafe, and that they are comfortable and encouraged to raise such concerns;
8. Report suspected abuse, neglect or mistreatment promptly to the appropriate authorities;
9. Share information appropriately and lawfully with other organisations where the safety and wellbeing of children is at risk; and
10. Value the input of and communicate regularly with families and carers

GUIDELINES

Fairhills High School is committed to promoting, and protecting at all times, the best interests of all children involved in our programs.

Fairhills High School supports and respects all children, staff and volunteers. Our school is committed to the cultural safety of Aboriginal and Torres Strait Islander children, and those from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for children living with a disability.

All children regardless of their gender, race, religious beliefs, age, disability, sexual orientation, or family or social background have equal rights to protection from abuse. Our child safe policies, procedures, strategies and practices will be inclusive of the needs of all children, particularly Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disabilities, students in out of home care, international students and children who are vulnerable.

Fairhills High School is committed to the safety, participation and empowerment of all children. We value the opinions of our students and will use their opinions to develop our child protection policies. The school has developed a safe, inclusive and supportive environment that involves and communicates with our students and their parents/carers. We encourage student and parent/carer involvement and engagement that informs safe school operations and builds the capacity of all to understand their rights and their responsibilities.

Strategies to embed a child safe culture

Fairhills High School's culture encourages staff, students, parents and the school community to raise, discuss and scrutinise child safety concerns. This makes it more difficult for abuse to occur and remain hidden.

All child safety documents, including this policy, the Child Safety Code of Conduct, the school's Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures, [Identifying and Responding to All Forms of Abuse in Victorian Schools](#) and the [Four Critical Actions for Schools](#) are readily available online on the school's website, and in hard copy from the school's main office, for all staff and students to read at any time.

Child safety is everyone's responsibility. **All school staff** are required to:

- Act in accordance with the school's Child Safety Code of Conduct, which clearly sets out the difference between appropriate and inappropriate behaviour
- Act in accordance with the Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures at all times, including following the [Four Critical Actions for Schools](#) where necessary
- Undertake annual guidance and training on child safety
- Act in accordance with their legal obligations, including:
 - Failure to disclose offence (applies to all adults)
 - Duty of care (applies to all school staff)
 - Mandatory reporting obligations (applies to all mandatory reporters, including teachers, principals, registered psychologists, and registered doctors and nurses)
 - Failure to protect offence (applies to a person in a position of authority within the school)
 - Reportable conduct obligations (applies to all school staff in reporting conduct to the principal, and applies to the principal in reporting to Employee Conduct Branch)
 - Organisational duty of care (applies to the school as an organisation)
 - For more information on these obligations, see [Identifying and Responding to All Forms of Abuse in Victorian Schools](#).
- As part of Fairhills High School's child safe culture, **school leadership** (including the principal and assistant principals) will:
 - Consider the diversity of all children, including (but not limited to) the needs of Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disabilities, and children who are vulnerable, when implementing the Child Safe Standards
 - Ensure that child safety is a regular agenda item at school leadership meetings and staff meetings
 - Encourage and enable staff professional learning and training to build deeper understandings of child safety and prevention of abuse
 - Promoting the discussion of child safety in appropriate classes, home groups or year level assemblies
 - Ensure that no one is prohibited or discouraged from reporting an allegation of child abuse to a person external to the school or from making records of any allegation.
- As part of Fairhills High School's child safe culture, **school mandatory reporting staff** are required to:
 - Complete the [Protecting Children – Mandatory reporting and other obligations](#) online module every year as a specific DET requirement
 - Read the school's Child Safety Code of Conduct on induction, and maintain familiarity with that document
 - Read the school's Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures on induction, and maintain familiarity with that document
 - Read the school's Child Safety Policy (this document) on induction, and maintain familiarity with that document.
- As part of Fairhills High School's child safe culture, in performing the functions and powers given to them under the *Education and Training Reform Act 2006*, **school councils and school council members** will:
 - Ensure that child safety is a regular agenda item at school council meetings
 - Consider the diversity of all children, including (but not limited to) the needs of Aboriginal and Torres Strait Islander children, children from culturally and

- linguistically diverse backgrounds, children with disabilities, and children who are vulnerable, when making decisions regarding the Child Safe Standards
- Undertake annual guidance and training on child safety, such as the [Child Safe Standards School Council Training PowerPoint](#).
- Approve the Child Safety Code of Conduct to the extent that it applies to school council employees and members, and if updated, note the new document in its school council meeting minutes
- When hiring employees, ensure that selection, supervision and management practices are child safe (unless delegated to the principal).

School leadership will maintain records of the above processes.

Roles and responsibilities

School leaders will ensure that each person understands their role, responsibilities and behaviour expected in protecting children and young people from abuse and neglect. Staff will comply with the school's Child Safety Code of Conduct, which sets out clearly the difference between appropriate and inappropriate behaviour.

Specific child safety responsibilities:

- The Assistant Principal (Policy Manager) is responsible for reviewing and updating the Child Safety Policy every three years
- The Principal is responsible for monitoring the school's compliance with the Child Safety Policy. The school community should approach the Assistant Principal (Policy Manager) if they have any concerns about the school's compliance with the Child Safety Policy
- The Principal is responsible for informing the school community about this policy, and making it publicly available
- Other specific roles and responsibilities are named in Fairhills High School's other child safety policies and procedures, including the Child Safety Code of Conduct, Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures, and risk assessment register.

Recruitment

Fairhills High School follows the Department's Recruitment in Schools guide to ensure child safe recruitment practices, available on the [Department's website](#).

Staff employed at Fairhills High School must provide a copy of their current Victorian Institute of Teaching (VIT) registration card (which requires a police check to be carried out regularly) and/or current Working With Children documentation.

All prospective volunteers are required to comply with our school's Volunteers Policy, including in relation to assessing the suitability of prospective volunteers and obtaining checks required under this policy. Prospective volunteers are required to maintain a valid Working with Children Check.

Training and supervision

Training and education is important to ensure that everyone in the school understands that child safety is everyone's responsibility.

Our school culture aims for all staff and volunteers (in addition to parents/carers and children) to feel confident and comfortable in coming forward with any allegations or suspicions of child abuse or child safety concerns. We train our staff and volunteers to identify, assess, and minimise risks of child abuse and to detect potential signs of child abuse. This training occurs annually or more often as required.

We also support our staff and volunteers through ongoing supervision to develop their skills to protect children from abuse, to promote the cultural safety of Aboriginal and Torres Strait Islander children and children from linguistically and/or diverse backgrounds, and the safety of children with a disability and vulnerable children.

New employees and volunteers will be inducted into the school, including by being referred to the Child Safety Policy (this document), the Child Safety Code of Conduct, and the Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures on the school website or being provided hard copies of this documentation.

They will also be supervised regularly to ensure they understand our school's commitment to child safety, and that their behaviour towards children is safe and appropriate. All employees of our school will be monitored and assessed via regular performance review to ensure their continuing suitability for child-connected work. Any inappropriate behaviour will be reported by school staff to the Principal or Assistant Principal and will be managed in accordance with Fairhills High School's Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures where required.

Reporting a child safety concern or complaint

The school has clear expectations for all staff and volunteers (including homestay providers) in making a report about a child or young person who may be in need of protection. All staff (including school council employees) must follow the school's Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures, including following the [Four Critical Actions for Schools](#) if there is an incident, disclosure or suspicion of child abuse. Immediate actions should include reporting their concerns to DHHS Child Protection, Victoria Police and/or another appropriate agency and notifying the principal or a member of the school leadership team of their concerns and the reasons for those concerns.

Fairhills High School will never prohibit or discourage school staff from reporting an allegation of child abuse. The school will always take action to respond to a complaint in accordance with the school's Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures. In accordance with Action 4 of the Four Critical Actions for Schools, Fairhills High School will provide ongoing support for students affected by child abuse.

The Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures can be found on the school's website.

Risk reduction and management

Fairhills High School believes the wellbeing of children and young people is paramount, and is vigilant in ensuring proper risk management processes, found in the school's risk assessment register. The school recognises there are potential risks to children and young people and will take a risk management approach by undertaking preventative measures. We will identify and mitigate the risks of child abuse in school environments by taking into account the nature of each school environment, the activities expected to be conducted in that environment and the characteristics and needs of all children expected to be present in that environment.

Fairhills High School monitors and evaluates the effectiveness of the actions it takes to reduce or remove risks to child safety, more information can be found in the school's risk assessment register.

Listening to, communicating with and empowering children

Fairhills High School has developed a safe, inclusive and supportive environment that involves and communicates with children, young people and their parents/carers. We encourage child and parent/carer involvement and engagement that informs safe school operations and builds the capability of children and parents/carers to understand their rights and their responsibilities. Our school is committed to supporting and encouraging students to use their voice to raise and share their concerns with a trusted adult at any time of need. Students can access information on how to report abuse at the school reception office, and/or our website.

When the school is gathering information in relation to a complaint about alleged misconduct with or abuse of a child, the school will listen to the complainant's account and take them seriously, check understanding and keep the child (and/or their parents/carers, as appropriate) informed about progress.

The school will promote the Child Safe Standards in ways that are readily accessible, easy to understand, and user-friendly to children, including:

- All of our child safety policies and procedures will be available for the students and parents at Fairhills High School to read at school reception, and/or from the school's website
- PROTECT Child Safety posters will be displayed across the school
- School newsletters will inform students and the school community about the school's commitment to child safety, and strategies or initiatives that the school is taking to ensure student safety

The school will use its health and wellbeing programs to deliver appropriate education to its students about:

- Standards of behaviour for students attending the school;
- Healthy and respectful relationships (including sexuality) through the Respectful Relationships Program;
- Resilience; and
- Child abuse awareness and prevention.

Communications

This school is committed to communicating our child safety strategies to the school community through:

- Ensuring that the Child Safety Policy (this document), Code of Conduct, and the Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedure are available on the school website
- Regular reminders in the school newsletter of our school's commitment to child safety
- Ensuring that child safety is a regular agenda item at school leadership meetings and staff meetings for discussion
- by placing PROTECT Child Safety posters throughout the school.

Confidentiality and privacy

This school collects, uses and discloses information about particular children and their families in accordance with Victorian privacy law. The principles regulating the collection, use and storage of information is included in the Department of Education and Training's [Schools' Privacy Policy](#).

Related policies and documents

Related policies and documents include:

- Code of Conduct
- Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures
- Risk assessment register
- [Identifying and Responding to All Forms of Abuse in Victorian Schools](#)
- [Four Critical Actions for Schools](#)
- [Recording your actions: Responding to suspected child abuse – A template for Victorian schools](#)
- [Identifying and Responding to Student Sexual Offending](#)
- [Four Critical Actions for Schools: Responding to Student Sexual Offending](#)
- [School Policy and Advisory Guide – Duty of Care](#)
- [School Policy and Advisory Guide – Child Protection Reporting Obligations.](#)

Policy evaluation and review

To ensure ongoing relevance and continuous improvement, this policy will be reviewed every three years. The review will include input from students, parents/carers and the school community.

Approval

School Principal: Harvey Wood

Date of last review: 26/3/20

Relevant Documents and Information:

- **Ministerial Order No. 870** – Child Safe Standards - Managing the risk of child abuse in schools.
- **Appendix 1 “What is Child Abuse?”**
- **Appendix 2 “Child Safe Code of Conduct”.**
- **Staff Selection and Recruitment Guidelines relating to Child Safety**
- **Fairhills High School Privacy Policy.**
- **Fairhills High School Child Safe Incident Report Form.**
- **Fairhills High School Risk Reduction and Management Policy.**
- **Child Safety Responding and Reporting Obligations (including Mandatory Reporting) Policy and Procedures.**
- **Duty of Care guidelines** – refer to <http://www.education.vic.gov.au/school/principals/spag/safety/Pages/dutyofcare.aspx>
- **Child Protection Reporting Obligations** – refer to <http://www.education.vic.gov.au/school/principals/spag/safety/Pages/childprotection.aspx>



APPENDIX 1 – WHAT IS CHILD ABUSE?

Revised : 26/03/20

What is child abuse?

Child abuse includes:

- any act committed against a child involving:
 - a sexual offence; or
 - grooming; and
- the infliction, on a child, of:
 - physical violence; or
 - serious emotional or psychological harm; and
- serious neglect of a child.

The child safe standards aim to protect children from abuse in organisations. Under the Act, child abuse includes five categories of abuse as outlined below.¹

While the standards apply specifically to child abuse, organisations should look to promote children's health and wellbeing in a broader sense.

Physical violence

Physical violence occurs when a child suffers or is likely to suffer significant harm from a non-accidental injury or injuries inflicted by another person. Physical violence can be inflicted in many ways, including beating, shaking, burning or use of weapons (such as, belts and paddles).

Possible physical indicators:

- Unexplained bruises
- Burns and/or fractured bones

Possible behavioural indicators:

- Showing wariness or distrust of adults
- Wearing long sleeved clothes on hot days (to hide bruising or other injury)
- Fear of specific people
- Unexplained absences
- Academic problems

Sexual offences

Sexual offences occur when a person involves the child in sexual activity, or deliberately puts the child in the presence of sexual behaviours that are exploitative or inappropriate to his/her age and development. Child sexual abuse can involve a range of sexual activity

¹ These definitions are based on the Victorian *Child Protection Practice Manual*: www.dhs.vic.gov.au/cpmanual/practice-context/child-protection-program-overview/1008-abuse-and-harm-legal-and-practice-definitions

including fondling, masturbation, penetration, voyeurism and exhibitionism. It can also include exposure to or exploitation through pornography or prostitution, as well as grooming behaviour.²

Possible physical indicators:

- Presence of sexually transmitted diseases
- Pregnancy
- Vaginal or anal bleeding or discharge

Possible behavioural indicators:

- Displaying sexual behaviour or knowledge that is unusual for the child's age
- Difficulty sleeping
- Being withdrawn
- Complaining of headaches or stomach pains
- Fear of specific people
- Showing wariness or distrust of adults
- Displaying aggressive behaviour

Serious emotional or psychological abuse

Serious emotional or psychological abuse occurs when harm is inflicted on a child through repeated rejection, isolation, or by threats or violence. It can include derogatory name-calling and put-downs, or persistent and deliberate coldness from a person, to the extent where the behaviour of the child is disturbed or their emotional development is at serious risk of being impaired. Serious emotional or psychological abuse could also result from conduct that exploits a child without necessarily being criminal, such as encouraging a child to engage in inappropriate or risky behaviours.

Possible physical indicators:

- Delays in emotional, mental, or even physical development
- Physical signs of self-harming

Possible behavioural indicators:

- Exhibiting low self-esteem
- Exhibiting high anxiety
- Displaying aggressive or demanding behaviour
- Being withdrawn, passive and/or tearful
- Self-harming

Serious neglect

Serious neglect is the continued failure to provide a child with the basic necessities of life, such as food, clothing, shelter, hygiene, medical attention or adequate supervision, to the extent that the child's health, safety and/or development is, or is likely to be, jeopardised. Serious neglect can also occur if an adult fails to adequately ensure the safety of a child where the child is exposed to extremely dangerous or life threatening situations.

² A new grooming offence commenced in Victoria on 9 April 2014. Further information is available on the [Department of Justice website](http://www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/grooming+offence) <www.justice.vic.gov.au/home/safer+communities/protecting+children+and+families/grooming+offence>

Possible physical indicators:

- Frequent hunger
- Malnutrition
- Poor hygiene
- Inappropriate clothing

Possible behavioural indicators:

- Stealing food
- Staying at school outside of school hours
- Aggressive behaviour
- Misusing alcohol or drugs
- Academic issues

Call the police on 000 if you have immediate concerns for a child's safety.

Information about child protection services can be found on the [Department of Health and Human Services website](http://www.dhs.vic.gov.au/for-individuals/crisis-and-emergency/reporting-child-abuse) <www.dhs.vic.gov.au/for-individuals/crisis-and-emergency/reporting-child-abuse>.



APPENDIX 2 – DEFINITIONS

Revised : 26/03/20

Child-connected work

Child-connected work means work authorised by the school, school council, or Secretary of the Department of Education and Training and performed by an adult in a school environment while children are present or reasonably expected to be present.

Child safety

Child safety encompasses matters related to protecting all children from child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to incidents or allegations of child abuse.

School environment

School environment means any physical or virtual place made available or authorised by the school for use by a child during or outside school hours, including:

- a campus of the school, including Knox Innovation Opportunity and Sustainability Centre (KIOSC);
- online school environments (including email and intranet systems); and
- other locations provided by the school for a child's use (including, without limitation, locations used for school camps, sporting events, excursions, competitions, homestays, and other school activities or events)

School Staff

School staff means an individual working in a school environment who is:

- employed by the Department of Education and Training;
- directly engaged or employed by a school council; or
- a volunteer or a contracted service provider (whether or not a body corporate or any other person is an intermediary).



CHILD SAFE CODE OF CONDUCT

Ratified: 17/08/18

Modified: 14/4/20

Fairhills High School is committed to the safety and wellbeing of children and young people. Our school community recognises the importance of, and responsibility for ensuring the school is a safe, supportive and enriching environment which respects and fosters dignity and self-esteem of students, and enables them to thrive in their learning and development.

This Code of Conduct aims to protect children and reduce any opportunities for child abuse or harm to occur. It also assists in understanding how to avoid or better manage risky behaviours and situations. It is intended to compliment child protection legislation, Department policy, school policies and procedures, and professional standards, codes or ethics as these apply to staff, volunteers, contractors and other personnel.

The Principal and Leadership Team at Fairhills High School will support implementation and monitoring of this Code of Conduct, and will plan, implement and monitor arrangements to provide an inclusive, safe and orderly school and broader learning environment. The Principal and Leadership Team will provide support and information to enable this Code of Conduct to operate effectively.

All staff, contractors, volunteers and members of Fairhills High School are required to observe child safe principles and expectations for appropriate behaviour towards and in the company of children, as noted below. The Code of Conduct applies in all school situations, including school camps, excursions, sporting events and the use of digital technology and social media.

All personnel of Fairhills High School are individually responsible for supporting and promoting the safety, participation, wellbeing and empowerment of children by:

- adhering to the child safe policy at all times and upholding the statement of commitment to child safety at all times
- taking all reasonable steps to protect children from abuse
- treating students and families in the school community with respect, both within the school environment and outside the school environment as part of normal social and community activities
- listening and responding to the views and concerns of children, particularly if they are telling you that they or another child has been abused and/or are worried about their safety or the safety of another
- promoting the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander children (for example, by never questioning an Aboriginal child's self-identification)
- promoting the cultural safety, participation and empowerment of children with culturally and/or linguistically diverse backgrounds (for example, by having a zero tolerance of discrimination)

- promoting the safety, participation and empowerment of children with a disability (for example, during personal care activities)
- ensuring as far as practicable that adults are not left alone with a child
- understanding and complying with all reporting or disclosure obligations (including mandatory reporting) as they relate to protecting children from harm or abuse
- immediately reporting any child safety concerns to DHHS Child Protection or appropriate agency
- reporting any allegations of child abuse or any child safety concerns to the Student Wellbeing Coordinator at Fairhills High School
- if an allegation of child abuse is made, ensure as quickly as possible that the child(ren) are safe and protected from harm
- encouraging children to 'have a say' and participate in all relevant organisational activities where possible, especially on issues that are important to them.

Staff, volunteers, contractors and any other member of the school community involved in child-related work must not:

- ignore or disregard any concerns or suspicions of suspected or disclosed child abuse
- develop any 'special' relationships with children that could be seen as favouritism or amount to 'grooming' behaviour (for example, the offering of gifts or special treatment for specific children)
- exhibit behaviours or engage in activities with students which may be interpreted as abusive and not justified by the educational, therapeutic, or service delivery context
- ignore behaviours by other adults towards students when they appear to be overly familiar or inappropriate
- exhibit behaviours with children which may be construed as unnecessarily physical
- put children at risk of abuse (for example, by locking doors)
- do things of a personal nature that a child can do for themselves, such as toileting or changing clothes
- engage in open discussions of a mature or adult nature in the presence of children
- discuss content of an intimate nature or use sexual innuendo with students, except where it occurs relevantly in the context of parental guidance, delivering the educational curriculum or a therapeutic setting
- use inappropriate language in the presence of children
- express personal views on cultures, race or sexuality in the presence of children
- treat a child unfavourably because of their disability, age, gender, race, culture, vulnerability, sexuality or ethnicity
- have contact with a child or their family outside of our organisation without the Principal's knowledge and/or consent (for example, no babysitting). Accidental contact, such as seeing people in the street, is appropriate
- communicate directly with a student or their families through personal or private contact channels (including social media, email, instant messaging, texting, etc) except where that communication is reasonable in all the circumstances, related to school work, classroom behaviour or extra-curricular activities or where there is a safety concern or other urgent matter
- photograph, record an image or video clip of a child in a school environment except in accordance with school policy or where required for duty of care purposes
- in the school environment or at other school events where students are present, consume alcohol contrary to school policy, or take illicit drugs under any circumstances.

It is expected that all staff, contractors, volunteers and members of Fairhills High School will fully adhere to this Code of Conduct.

By observing these standards it is acknowledged that all members of the school community have a responsibility to immediately report any breach of this Code to the Principal, Harvey Wood (or appropriate delegate of the Principal).