



CHILD SAFETY RESPONDING AND REPORTING OBLIGATIONS POLICY AND PROCEDURE

Salesian College Sunbury is an inclusive Catholic Faith Community in the spirit of St John Bosco.

- We are a welcoming COMMUNITY that fosters an atmosphere of joy and optimism.
- We strive for engagement in LEARNING for which we are collectively responsible.
- We promote the pursuit of EXCELLENCE in all aspects of life.
- We are inspired by our FAITH to serve others and develop as resilient, thoughtful and caring citizens of the world.

Central to these values is an unequivocal commitment to fostering the dignity, self-esteem and integrity of children and young people and providing them with a safe, supportive and enriching environment to develop spiritually, physically, intellectually, emotionally and socially.

INTRODUCTION

The protection of children and young people in Catholic schools and institutions is based upon the belief that each person is made in the image and likeness of God and that the inherent dignity of all should be recognised and fostered. At Salesian College Sunbury (the College) staff are entrusted with the holistic education of the child, in partnership with parents, guardians and caregivers, who are the primary educators of their children. College staff therefore have a duty of care to students to take reasonable care to avoid acts or omissions that they can reasonably foresee would be likely to result in harm or injury to the student, and to work for the positive wellbeing of the child.

In Australia, the vision is for all children and young people to reach their full potential by growing up safe and supported, free from harm and neglect. In Victoria, the [PROTECT](#) protocol, involving the Victorian Department of Education and Training (DET), the Victorian Catholic Education Authority (VCEA) and licensed children's services, exist to protect the safety and wellbeing of children and young people. The protocol outlines [4 Critical Actions](#) that schools must take in order to prioritise the safety and wellbeing of children and young people.

All College Board members, teachers, non-teaching staff, St Mary's College for the Deaf staff, contractors (including third party contractors), volunteers and any other staff hired by the College, parish priests, canonical and religious order administrators must understand and abide by the professional, moral and legal obligations to implement child abuse and child safety policies, protocols and practices.

When a child safety incident, disclosure or concern is raised, the College recognises the right of every child and young person to be heard, protected and supported. We promote equity, respect diversity and ensure that children, young people and their families have their concerns taken seriously and appropriately responded to and resolved.

PURPOSE

The purpose of this policy is to:

- describe how staff at the College identify and respond to child safety concerns and child abuse
- ensure all staff at the College (and who come into contact with the College) comply with the Child Safe Standards as gazetted by the Minister for Child Protection; and
- ensure that the College complies with prescribed minimum standards for the registration of schools in section 4.3.1(6)(d) and school boarding premises in section 4.3.8 (1)(d) of *Education and Training Reform Act 2006* (Vic.)
- ensure our staff and school community report concerns about child abuse to relevant staff and authorities.

Ministerial Order No. 1359: *Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and school boarding premises* was made under the *Education and Training Reform Act 2006* (Vic.) describes a range of outcomes and actions that a school and school boarding premises must undertake to demonstrate compliance with the Child Safe Standards. The Order applies to complaints and concerns relating to child abuse made by or in relation to a child or student, College staff member, volunteer, contractor, service provider, visitor or any other person while connected to the College environment.

This Policy assists staff at the College (which includes volunteers, contractors, other service providers and religious leaders including clergy) to:

- identify the indicators of a child or young person who may be in need of protection
- understand how a suspicion or reasonable belief is formed
- where possible, refer to the principles of the Victorian Charter of Human Rights and Responsibilities as best practice in respecting and protecting the basic rights, freedoms and responsibilities of members of the school community
- make a mandatory report about a child or young person who may be in need of protection
- comply with obligations under the Victorian Reportable Conduct Scheme
- comply with mandatory reporting obligations under Child Protection law
- comply with legal obligations relating to criminal child abuse and grooming under criminal law.

SCOPE

This policy applies to any concern of child abuse or reportable conduct:

- by any adult engaged by the school or school council (including e.g. staff, volunteers, contractors and service providers)
- between students
- in the family
- in the community.

Child abuse and reportable conduct can occur in any physical or online environment and includes grooming.

DEFINITIONS

There are many types of child abuse. For more information, see [Types of child abuse and what to look for](#) and [Child Safety Definitions](#).

Child abuse includes:

- any act committed against a child involving a sexual offence or grooming
- physical violence against a child
- serious emotional or psychological harm against a child
- serious neglect of a child.
- Harmful sexual behaviour

Reportable Conduct includes:

- a sexual offence committed against, with or in the presence of a child,
- sexual misconduct committed against, with or in the presence of a child
- physical violence committed against, with or in the presence of a child
- behaviour causing significant emotional or psychological harm to a child, or
- significant neglect of a child by any person engaged by the Department or a Victorian government school or school council including staff, volunteers, contractors and service providers. For further information see: [Reportable and Notifiable Conduct Policy](#).

Child abuse can have a significant effect on a child's physical, social, psychological or emotional health, development and wellbeing. The younger the child, the more vulnerable they are to abuse and the more serious the consequences are likely to be.

There can be physical or behavioural indicators of child abuse and neglect, or a combination of both. While the presence of a single indicator, or even several indicators, does not necessarily prove that abuse or neglect has occurred, the repeated occurrence of either a physical or behavioural indicator, or the occurrence of several indicators together, should alert school staff to the possibility of child abuse or neglect.

Child sexual abuse is more commonly perpetrated by someone who is known to and trusted by the child and is also often someone highly trusted within their families, communities, schools and/or other institutions, such as the Church.

POLICY

Everyone at the College has an important role to:

- prevent child abuse (including grooming) in the College or during school activities
- identify and respond to concerns of child abuse:
 - by an adult engaged by the College
 - between students
 - in the family
 - in the community.

The College follows the following department policies on the Policy and Advisory Library (PAL):

- [Protecting Children – Reporting and Other Legal Obligations policy](#) (Protecting Children Policy)
- [Reportable and Notifiable Conduct policy](#).

The College has several other policies that describe actions we take to ensure students are safe and feel safe to raise a complaint. These include:

- Child Safety and Wellbeing Policy
- Child Safety Code of Conduct
- Student Wellbeing Policy
- Student Duty of Care Policy
- Complaints Policy
- Reportable Conduct Policy

These policies are available on the College website at <https://www.salesiansunbury.vic.edu.au/>

PROCEDURES FOR RESPONDING TO AN INCIDENT, DISCLOSURE, OR ALLEGATION OF CHILD ABUSE

Where an allegation is made against a person, the College will ensure that the person who is the subject of the allegation is afforded procedural fairness and a fair process, while prioritising the safety and wellbeing of children and complying with all reporting and investigation obligations.

MANDATORY REPORTING

Mandatory reporting is a legal requirement under the *Children, Youth and Families Act 2005* (Vic.) to protect children from harm relating to physical injury and sexual abuse. A child, for the purpose of the relevant parts of this Act, is any person who is under the age of 17 years. In Victorian schools, registered teachers, school principals, early childhood workers, registered psychologists, school counsellors and all people in religious ministry are mandated to report a reasonable belief of child physical or sexual abuse to Child Protection authorities. The report must be made as soon as practicable after forming the belief.

College staff have a duty to take reasonable steps to protect children and young people under their care and supervision from harm that is reasonably foreseeable (this duty applies to all College staff). The question of what constitutes reasonable steps will depend on the individual circumstances of each case. A staff member may breach their duty of care towards a student if they fail to act in the way a reasonable or diligent professional would have acted in the same situation. For more information on the scope of staff duty of care obligations and examples of reasonable steps they can take in relation to suspected child abuse, refer to the [PROTECT website](#).

If, in the course of carrying out their duties, a mandatory reporter forms a reasonable belief that a child is in need of protection because the child has suffered, or is likely to suffer, significant harm as a result of physical injury or sexual abuse, and that the child's parents/guardians/carers are unwilling or unable to protect the child, they must report that belief to the Department of Families, Fairness and Housing (DFFH) Child Protection and/or Victoria Police, including the information prescribed [PROTECT website](#), as soon as possible after forming the belief.

A subsequent report must be made on each occasion on which the mandatory reporter becomes aware of further reasonable grounds for the belief and even if the reporter knows that another report has been made concerning the same child and suspected abuse.

The threshold for reporting child abuse incidents, disclosures, concerns or suspicions has been set deliberately low by the joint protocol [PROTECT website](#). This protocol focuses on [Four Critical Actions](#) that all College staff must take if they form a suspicion or reasonable belief that child abuse has occurred, or that a child is at risk of suffering abuse.

If a staff member becomes aware that a student is, or may be, experiencing, or is at risk of, child abuse (including grooming) **they MUST act** by reporting to the child safety contacts listed in Appendix 1.

All concerns must be reported even if the person raising the concern does not know if it is true.

Where the concern is about the child safety contact, the staff member must notify the College Principal.

Where the concern is about the Principal, the staff member must notify the Chair of the College Board on board@scr.vic.edu.au.

The College must respond to the report by following the relevant 4 critical actions depending on the source of the abuse:

- [4 Critical Actions to identify and respond to child abuse by an adult engaged by the school](#)
- [4 Critical Actions to identify and respond to student-to-student abuse](#)
- [4 Critical Actions to identify and respond to child abuse in the family](#)
- [4 Critical Actions to identify and respond to child abuse in the community](#).

Detailed guidance on the **4 Critical Actions** is set out on the [PROTECT website](#). This includes guidance on how to respond to a disclosure of child abuse made by a student or young person in a trauma-informed way and provide appropriate support, including suggested language to use.

Notes and records

College staff members are to keep clear and comprehensive notes relating to incidents, disclosures and allegations of child abuse. Even if a College staff member decides not to make a report, they must still accurately document their notes relating to the incident, disclosure or allegation of child abuse. Notes and records must be kept securely on school grounds and must not be destroyed as they may be needed at a later time.

Disclosures

It is the role of College staff members to reassure and support a child or young person who makes a disclosure of abuse, and to ensure that the disclosure is taken seriously. However, College staff members should never promise to keep any disclosures confidential, as all disclosures of abuse must be reported. The role of College staff remains the same if disclosures are made by a parent/guardian/carer or a sibling, or if disclosures involve family violence. For strategies on how to manage a disclosure, refer to the [PROTECT website](#).

Reasonable belief

Where College staff members are concerned about the safety and wellbeing of a child or young person, they must assess that concern to determine if a report should be made to the relevant agency. If a staff member has witnessed potentially abusive behaviour, has a suspicion or has received a disclosure of child abuse, they must determine whether these observations or receipt of such information have caused the staff member to form a reasonable belief.

A reasonable belief or a belief on reasonable grounds is not the same as having proof but is more than rumour or speculation. A reasonable belief is formed if a reasonable person in the same position would have formed the belief on the same grounds. A reasonable belief might be formed if:

- a child states that they have been physically or sexually abused
- any person tells you that they believe someone has been abused; this may include a child who is talking about themselves
- you observe physical or behavioural indicators of abuse, as described in the [PROTECT website](#)
- a child or young person exhibits sexually abusive or age-inappropriate sexually abusive behaviour(s)
- professional observations of the child's behaviour or development causes you to form a belief that the child has been physically or sexually abused or is likely to be abused.

While any indicators of possible child abuse or neglect are concerning, it is important to understand that the presence of a number of indicators that suggest either physical or sexual abuse of a child may be sufficient to form a reasonable belief in a mandatory reporter's mind which must be reported.

Child safety contacts

The College has identified child safety contacts. These staff are responsible for managing child safety incidents. They are listed in **Appendix 1**.

Anyone can contact these staff to discuss a child safety concern. This includes parents/carers, staff, volunteers, students or anyone else who has concerns about abuse (including grooming). These staff will:

- ensure that child safety concerns are taken seriously
- promptly and thoroughly manage the school's response
- arrange support for any student who is impacted by abuse
- communicate with any student who raises, or is affected by, a complaint or concern
- monitor overall compliance of the school with PROTECT and the relevant [4 Critical Actions](#).

Meeting our legal obligations

All College staff must take reasonable steps to minimise risks of harm to students in their care that is reasonably foreseeable.

Following the [4 Critical Actions](#) ensures that the College takes all the necessary steps where there is a concern about abuse (or grooming). If any staff member is concerned that these processes have not been followed, they must:

- raise their concerns with the principal and escalate to the College Board (board@scr.vic.edu.au) if they remain unsatisfied
- report concerns to the appropriate authorities (e.g. Victoria Police or Child Protection) in line with their [legal obligations and child safety frameworks](#).

Further information on relevant legal obligations is provided in Appendix 2.

COMMUNICATION

This policy and procedure will be communicated to the College community as follows:

- published on the College website
- included in staff induction processes and annual staff training
- communicated to the College community through Schoolbox
- included in volunteer induction processes and training for relevant volunteers
- discussed in annual staff briefings or meetings
- included in the staff handbook
- made available in hard copy available from school administration upon request.

Responding to complaints or concerns

The College ensures that children, young people, families, staff and volunteers can raise concerns and complaints in ways that are accessible, culturally safe and responsive to their individual communication and support needs.

The College may receive complaints or concerns from students, parents/guardians/carers, staff, volunteers or other members of the College community. These complaints or concerns may be voiced by parents/guardians/carers or others within the College community.

The College will follow its internal complaints-handling procedure and process to ensure that all complaints, concerns or feedback on school policies, procedures or processes are effectively captured and appropriately managed. As a first step, the College will ensure that the complaint does not raise concerns that child abuse or a risk of child abuse has gone unreported. If this is the case, College staff must follow the [4 Critical Actions](#) to ensure that any new information received through a complaint or concern from a member of the College community is reported to authorities where required.

Further information and RESOURCES

The following policies and guidance are relevant to this policy:

- [PROTECT policy and guidance](#)
- [Reportable and Notifiable Conduct Policy](#)
- [Protecting Children – Reporting and Other Legal Obligations Policy](#)
- [Child Safe Standards](#)
- [Managing and Reporting School Incidents](#)
- [Duty of Care](#)
- [Restraint and Seclusion](#)
- [Identify and respond to student sexual offending](#)

POLICY INFORMATION

Responsible director	AP – Savio and Bosco Campuses
Policy owner	College Executive
Approving authority	College Executive
Assigned board committee	Child Safety
Committee Approval Date	16/08/2016
Executive Approval date	25/05/2026
Executive Review by	25/05/2028
Publication	Schoolbox; Website

POLICY DATABASE INFORMATION	
Assigned framework	MS4-Student_Care; CA7-Child Safety & Wellbeing
Superseded versions	2016 v.1.0, 2017 v.1.1, 2020 v.1.2, 2022 v.2.0, 2024 v2.1, 2026v3.0 (ACF accredited) formerly PROTECT: Identifying and Responding to Abuse - Reporting Obligations

APPENDIX 1: Child Safety Contacts

Anyone can contact these staff to discuss a child safety concern. This includes parents/carers, staff, volunteers, students or anyone else who has concerns about abuse (including grooming).

Role	Name	Phone
<u>Principal</u>	Mr Mark Brockhus principal@scr.vic.edu.au	9744 0000
<u>College Child Safety Contacts:</u>		
<u>Assistant Principals:</u>	Mr Clinton Gray (Assistant Principal - Savio Campus) cgray@scr.vic.edu.au	9744 0000
	Ms Romi Bennett (Assistant Principal - Bosco Campus) rbennett@scr.vic.edu.au	9744 0000
<u>Deputy Principal:</u>	Ms Ammie Franklin (Deputy Principal - People & Culture) afranklin@scr.vic.edu.au	9744 0000
<u>Student Wellbeing lead(s):</u>		
<u>Wellness Team Leader:</u>	Mr Peter Hichaaba (Wellness Team Leader) phichaaba@scr.vic.edu.au	9744 0000
<u>Directors of Students:</u>	Mr Daniel Pell (Director - Students (Year 7-8)) dpell@scr.vic.edu.au	9744 0000
	Ms Sharleen Stone (Director - Students (Year 9 - 10)) stone@scr.vic.edu.au	9744 0000
	Ms Rani Valencich (Director - Students (Year 11-12)) rvalencich@scr.vic.edu.au	9744 0000
<u>College Board Chair (for allegations about the Principal):</u>	Mr Peter Dwyer (College Board Chair) board@scr.vic.edu.au	
<u>College Child Safety Sub-Committee Chair (for allegations about the Principal):</u>	Ms Jane Lees (College Child Safety Sub-Committee Chair) board@scr.vic.edu.au	

APPENDIX 2: Legal Obligations Relating to Reporting Child Abuse

There are various legal obligations to report child abuse to relevant authorities, which are listed below. This policy ensures compliance with our legal obligations and child safety frameworks and our school's duty of care obligations. These include:

- **Mandatory reporting** to the Department of Families, Fairness and Housing (DFFH) Child Protection, which applies where a mandatory reporter forms a reasonable belief a child has suffered, or is likely, to suffer significant harm as a result of physical injury or sexual abuse and their parents/carers have not protected, or are unlikely to protect, them from that harm.
- **Referring family violence or** child wellbeing concerns to The Orange Door, which can provide support and information for children, young people and families, including support relating to family violence, parenting and wellbeing.
- **Reportable conduct**, which requires certain allegations against adults working in organisations that work with children (including schools) to be reported to the Social Services Regulator and investigated under the Reportable Conduct Scheme.
- **Failure to disclose offence**, which requires all adults to report to Victoria Police, as soon as practicable, where they form a reasonable belief that a sexual offence has been committed by an adult against a child under the age of 16 in Victoria.
- **Failure to protect offence**, which requires school staff in a position of authority who become aware that an adult associated with their school poses a risk of sexual abuse to a child under the age of 16 under their care, authority or supervision, to take all reasonable steps to remove or reduce that risk.

Further information about these legal obligations is available from:

- Department of Education Policy and Advisory Library:
 - [Protecting Children – Reporting and Other Legal Obligations Policy](#)
 - [Reportable and Notifiable Conduct Policy](#)
- [PROTECT Legal Obligations and Child Safety Frameworks](#)

APPENDIX 3: Child Safety Incident Report Form

Incident Report Form

This form must be used to record details of any:

- Incidents, allegations, disclosures or reasonable concerns in relation to abuse or neglect of a child or young person, either by personnel within our organisation or by others
- breaches or actions of other personnel within our organisation that contravene our policies and procedures, such as outlined in our [\[Code of Conduct\]](#)

Child / Young Person's Name:			
Program:			
Date of incident:		Site/location where incident occurred:	
Person making Report:		Role & relationship to child:	
Type of incident (tick all that apply):			
☐	Suspicion or allegation of abuse or neglect of child/young person	☐	Breaches of Code of Conduct
☐	Suspicion of potential harm to a child/young person	☐	Breach of Safeguarding Children or reporting policy
☐	A critical incident as defined in the Incident Management policy	☐	Potential abuse by or criminal matters involving an employee

Details of the child / young person affected by the incident

[A Separate Incident Report Form should be completed for each child]

Full name			
Date of birth		Gender	
Any accessibility, communication, medical or cultural requirements			
Parent/care giver name			
Parent/care giver contact/s phone	(Home) (Mobile)	(Work)	
parent/care giver address			
Any known parent / care giver accessibility, communication, medical or cultural requirements			

Details of other persons involved

Other Children and Young People	
Were there other children and young people present? Yes ☐ No ☐	
If yes, please provide their details below:	
Name	

Has a separate incident report form been completed for this child/young person? Yes ☐ No ☐
 If no, please provide a reason as to why:

Alleged perpetrator(s) details:

Name - if known.	
Connection with the child - if known	
Any other relevant factors:	

Witness Details

Were there any other witnesses to the incident? Yes ☐ No ☐

If yes, please provide their details below:

Full name	
Involvement as witness	
Contact phone number	
Full name	
Involvement as witness	
Contact phone number	
Any accessibility, communication, medical or cultural requirements	

Details of incident

(Please describe in as much factual details as possible the incident including the events which lead up to the incident, sighted injury or other indicators of abuse, conversations with the child, alleged perpetrator/s behaviour)

Action undertaken (if any):

To ensure the safety of child/young person:	
To address the support needs of the child / young person and their family:	
To address the support needs of the alleged perpetrator:	

To address the support needs of other personnel involved:	
Other children/young people involved	
Any others involved?	

Incident response

Please tick who of the following have been informed of this incident:	
Externally	Police ☐ Child Protection ☐ Ambulance ☐ Doctor ☐ Family / Care Giver ☐ Reportable Conduct Authority ☐ Working with Children Check Authority ☐ Other (please specify) ☐ _____
Internally	Full Name of Incident Reporter: Position / title: Contact details of Reporter: Date and time of Report:

Police

Date:		Time:	
Name of person notified:		Position:	
Department / region:		Contact detail/s:	
Advice provided:			
Engagement Number:			

Child Protection authorities

Date:		Time:	
Name of person notified:		Position:	
Department / region:		Contact detail/s:	
Advice provided:			
Engagement Number:			

Reportable Conduct authorities

Date:		Time:	
Name of person notified:		Position:	
Department / region:		Contact detail/s:	
Advice provided:			
Engagement Number:			

Parent / Care Giver

Has the [x insert parent/care giver x] been informed of the incident: Yes ☐ No ☐
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(If appropriate) has the [x insert parent/care giver x] been informed the authorities being notified: Yes ☐ No ☐	
If yes, please provide relevant details of conversations:	<i>E.g. (information provided, reactions, concerns and admissions)</i>
If no, please explain why:	

Please provide details of which manager/s or other personnel have been informed of the incident?	
Full name:	
Position / title:	
Date and time informed:	
Full name	
Position / title:	
Date and time informed:	

Additional comments / including other Reporting bodies, (e.g., ACF, ACECQA, Education authorities, Case Worker)

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Acknowledgement of form completion

I have completed this form to the best of my knowledge and ability			
Name		Position	
Signed		Date	

Supervisor

I have checked that all sections of this form are complete			
Name		Position	
Signed		Date	

Privacy Disclaimer:

Salesian College Sunbury acknowledges and respects the privacy of all its employees, volunteers, contractors and patrons. The information being collected is for the purposes of obtaining details of and assessing the incident in question. Information disclosed on this form may be passed on to the appropriate authorities, as required. By signing this form, you have consented to this information being collected, used and disclosed for the purposes it intended. You have the right to access and alter personal information concerning yourself in accordance with the Commonwealth Privacy Act (amended 2001) and the Collge's Privacy Policy.