



CHILD SAFETY RESPONSE AND REPORTING POLICY

Version 4.0

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1. INTRODUCTION

Under the *National Framework for Protecting Australia's Children 2009–2020*, protecting children is everyone's responsibility – parents, communities, governments, and businesses all have a role to play.

In Victoria, a joint protocol, ***Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools***, involving the Victorian Department of Education and Training (DET), the Catholic Education Commission of Victoria Ltd (CECV) and Independent Schools Victoria (ISV) exists to protect the safety and wellbeing of children and young people.

Purpose

Camberwell Girls Grammar School (CGGS) is committed to preventing harm to children through the reporting of child abuse, harm, and neglect. This Child Safety Reporting Policy sets out the principles and framework governing the behaviours and activities which enact the mandatory reporting obligations which include reportable conduct. This Policy must be read and understood by all those connected with the School.

Scope

CGGS must comply with the legal obligations that relate to managing the risk of child abuse under the *Children, Youth and Families Act 2005* (Vic.), the *Crimes Act 1958* (Vic.), the *Child Wellbeing and Safety Act 2005* (Vic.) and the *Education and Training Reform Act 2006* (Vic.).

The *Child Wellbeing and Safety Act 2005* (Vic.) introduced the seven Victorian Child Safe Standards which aim to create a culture where protecting children from abuse is part of everyday thinking and practice. The Child Safe Standards were introduced in response to recommendations made by the *Betrayal of Trust* report.

Ministerial Order No. 1359 – *Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises* sets out the specific actions that all Victorian schools must take to meet the requirements in the Child Safe Standards.

Child protection reporting obligations fall under the following pieces of legislation with differing reporting requirements:

- The *Children, Youth and Families Act 2005* (Vic.)
- The *Child Wellbeing and Safety Act 2005* (Vic.)
- The *Education and Training Reform Act 2006* (Vic.)
- The *Crimes Act 1958* (Vic.)

These legislative obligations exist in addition to moral and duty of care obligations, which require school community members to protect any child under their care and supervision from foreseeable harm.

All staff (teaching and professional services), volunteers, contractors, visitors, and any other persons associated with Camberwell Girls Grammar School (CGGS), must understand, and abide by the professional, moral and legal obligations to implement child protection and child safety policies, protocols and practices. This policy should be read and understood by all those connected to the school.

Commitment to Child Safety

Camberwell Girls Grammar School (CGGS) is a child safe organisation which welcomes all children, young people, their families, and their participation. We are committed to providing culturally inclusive environments where all our students are safe and feel safe and have confidence their voice is heard. We promote positive interactions between students and adults, and between students and their peers based on mutual trust and respect.

Child safety is a shared responsibility. Everyone engaged or employed by CGGS has a role to play in promoting child safety. All are aware of their responsibility to promptly raise issues or concerns about a child's safety or wellbeing. We have zero tolerance for child abuse, and we take proactive steps to identify children who may be at risk or experiencing vulnerability to mitigate harm or distress.

Particular attention is given to the safety needs of Aboriginal or Torres Strait Islander students, those from culturally and linguistically diverse backgrounds, students with disabilities, international students, those unable to live at home and children and young people who identify as LGBTQIA+.

We regularly seek input from students, parents, carers, staff, and volunteers in our child safe practices and communicate our policies and ongoing strategies following each systematic review.

Commitment to equity, diversity and inclusion

Camberwell Girls Grammar School welcomes students from all faiths. Students enrolled at the School come from diverse social, cultural, geographic, and family backgrounds, are of many identities, and of all abilities. The School supports the pursuit of equity for all students and embraces the diversity within. All students enrolled at CGGS have the right to an inclusive education with access to and participation in a high-quality education alongside their similar-aged peers with support from reasonable adjustments and teaching strategies tailored to meet their individual needs. Inclusion is embedded in all aspects of school life, and is supported by culture, policies, and everyday practices.

Policy objectives

CGGS is committed to creating and maintaining a school in which all children are safe from harm. The School has a zero tolerance of child abuse.

This policy is designed to enable CGGS to comply with the Victorian Child Safe Standards – '*processes for responding to and reporting suspected child abuse*', as well as the school specific requirements for procedures for responding to allegations of suspected abuse in Ministerial Order No. 1359. It is designed to assist school staff (which includes volunteers, contractors, other service providers, ministers of religion, and any other persons associated with the School) to:

- Understand their child safety reporting obligations
- Be familiar with how to make a child safety report to the relevant authorities
- Identify the indicators of a student who may be in need of protection

This policy also addresses the manner in which the School complies with its organisational obligations by ensuring that it has in place:

- A system for preventing the abuse of students by an employee of the School
- A system for enabling any person associated with the School, to feel supported in making a report to the relevant authorities
- A system for investigating and responding to child abuse allegations

Statement

CGGS adheres to the belief that every child has a right to live a full and productive life in an environment that builds confidence, friendships, security and happiness, irrespective of their family circumstances or background.

The Children, Youth and Families Act (CYFA) 2005 has a unifying set of 'best interest principles' to which CGGS subscribes.

These include:

- Supporting the child;
- Reporting to Child Protection and/or police all allegations or disclosures of physical, sexual, or emotional abuse and neglect;
- Reporting to Child Protection and/or police when a belief is formed that a child has been harmed or is at risk of being harmed;
- Making the child's ongoing safety and wellbeing the primary focus of decision-making;
- Sharing appropriate information, expertise, and resources with other service providers;
- Protecting and promoting the cultural and spiritual identity of a child and maintaining their connection to their family or community of origin; and
- Enabling the child and the child's family to access appropriate services in order to reduce the long-term effects of abuse or neglect.

Definitions

Child	An individual who is under the age of 18 years and who is enrolled as a student at CGGS. Under the 'Failure to Disclose', 'Failure to Protect' and 'Grooming' criminal offence, a child is defined as any individual who is under the age of 16 years of age.
Child Abuse	Includes: <ul style="list-style-type: none"> a) any act committed against a child involving <ul style="list-style-type: none"> • a sexual offence or • an offence under section 49B(2) of the Crimes Act 1958 (grooming) and b) Infliction on a child of <ul style="list-style-type: none"> • physical violence or • serious emotional or psychological harm and c) Serious neglect of a child
Child-connected work	This is work which is authorised by CGGS that is performed by an adult in the CGGS school environment while children are present or reasonably expected to be present.
Child Related work	Work that usually involves (or is likely to involve) direct contact with a child (including oral, written, or electronic communication as well as face-to-face and physical contact) that is a central part of that person's duties. Child-related work may be either paid or unpaid (voluntary). It does not include work that involves only occasional direct contact with children that is incidental to that person's work.
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.
Investigator	The investigator will be a Child Safety Officer with sufficient skill and experience and not previously involved in the matter. An investigator may be an external advisor appointed by the Principal or their delegate.
School environment	The CGGS school environment is any physical or virtual place made available or authorised by CGGS for use by a child during or outside school hours, and includes: <ul style="list-style-type: none"> a) our Senior School campus at 2 Torrington Street, Canterbury b) our Junior School campus at 4 Mont Albert Road, Canterbury and formerly at St John's Avenue, Mont Albert c) online School environments including email and intranet systems d) other locations provided by CGGS for a child's use, including locations used for school camps, sporting events, excursions, competitions, and other events.
Staff in a non- government school	An individual working at CGGS who is: <ul style="list-style-type: none"> a) directly engaged or employed by the school b) a volunteer or a contracted service provider c) a minister of religion

Child FIRST	Child and Family Information Referral and Support Teams This is the entry point into integrated family services in a service area. Children and families are referred to Child FIRST where there are significant concerns about a child's wellbeing. It does not have any statutory powers to protect a child but can refer matters to family services.
Department of Health and Human Services (DHHS) Child Protection	The Department of Health & Human Services has a statutory responsibility under the CYFA to provide child protection services for children and young people in Victoria under the age of 17 years in need of protection or, when a protection order is in place, children under the age of 18 years.
Children, Youth and Families Act 2005	Referred to as the CYFA Victorian legislation that governs the child and family services sector.
Commission for Children and Young People	Referred to as the CCYP An independent statutory body that promotes improvement in policies and practices affecting the safety and wellbeing of Victorian children and young people. It is responsible for administering the Victorian Reportable Conduct Scheme.

2. REPORTING OBLIGATIONS

As a registered school under the Victorian Registration and Qualifications Authority (VRQA), CGGS must comply with the requirements of the Education and Training Reform Act 2006 and the Education and Training Reform Regulations 2017 by ensuring that:

- The care, safety and welfare of all students attending the School is in accordance with any applicable State and Commonwealth laws, and
- All staff employed at the School are advised of their obligations under those laws

Any adult associated with the School has a moral obligation to protect any child under their care and supervision from reasonably foreseeable harm. This includes abuse that has, or is suspected to have, taken place within or outside of school grounds and hours. For specific members of the school community (e.g., Mandatory Reporters), there may be specific legislative requirements in protecting children such as identifying, responding to and reporting child abuse. Below is a summary of the possible reporting obligations that need to be considered:

- Duty of care obligations
- Mandatory reporting obligations
- Criminal offences
- Reportable conduct obligations

In some instances, there may be more than one reporting obligation. For example, a sexual offence committed by a staff member identified by the School Nurse will be reportable under both Mandatory Reporting and Reportable Conduct protocols.

The School has in place Child Safety Officers specifically trained in handling child safety matters and to assist in identifying whether a concern is required to be reported. The first point of contact for all child safety concerns should be a Child Safety Officer. The School has adopted the Protect - Four Critical Actions framework for responding to child abuse.

Below is a discussion on the relevant reporting obligations.

Duty of Care Obligations

School staff have a duty to take reasonable steps to protect students under their care and supervision from harm that is reasonably foreseeable (this duty applies to **all** school staff). The question of what constitutes reasonable steps is determined on a case by case basis.

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.

In relation to suspected child abuse, reasonable steps may include (but are not limited to):

- Acting on concerns and suspicions of abuse as soon as practicable
- Seeking appropriate advice or consulting with other professionals or agencies when unsure of the steps to take

- Reporting the suspected child abuse to appropriate authorities such as Victoria Police, DHHS Child Protection and Child FIRST
- Arranging counselling and/or other appropriate welfare support for the student
- Providing ongoing support to the student
- Sharing information with other school based staff who will also be responsible for monitoring and providing ongoing support to the student

In relation to reporting obligations under the duty of care, all adults are required to report to the relevant authorities when they have formed a reasonable belief in the following instances:

- A child has suffered, or is likely to suffer, significant harm as a result of physical injury and the child's parents have not protected, or are unlikely to protect, the child from harm of that type
- A child has suffered, or is likely to suffer, significant harm as a result of sexual abuse and the child's parents have not protected, or are unlikely to protect, the child from harm of that type
- The child has suffered or is likely to suffer emotional or psychological harm that is likely to significantly damage the child's emotional or intellectual development and the child's parents have not protected or are unlikely to protect the child from harm of that type
- The child has been abandoned by their parents and after reasonable enquiries, the parents cannot be found, and no other suitable person can be found who is willing and able to care for the child
- The child's parents are dead or incapacitated and there is no other suitable person willing and able to care for the child
- The child's physical development or health has been or is likely to be harmed and the parents have not provided or are unable or unlikely to provide, basic care, effective medical, surgical, or remedial care for the child (neglect)
- A child has been exhibiting sexually abusive behaviours and may be in need of therapeutic treatment
- A child has exhibited sexually abusive behaviours using their power, authority, or status to engage another party in sexual activity that is unwanted, or the other party is unable to give consent
- A child under 10 has exhibited problem sexual behaviours
- A child has suffered, or is likely to suffer, significant harm as a result of physical injury from another child
- A child has suffered, or is likely to suffer, significant harm as a result of sexual abuse from another child (Student-to-student sexual offending)

In addition, all School staff have the following additional duty of care reporting obligations:

- Significant parenting problems that may be affecting the child's development
- Serious family conflict, including family breakdown
- Families under pressure due to a family member's physical or mental illness, substance abuse, disability, or bereavement
- Young, isolated and/or unsupported families
- Significant social or economic disadvantage that may adversely impact on a child's care or development
- Significant concern for the safety, health, and wellbeing of a child
- Reasonable suspicion / belief that a child is exposed to family violence (including witnessing family violence), or is at risk of family violence having an impact on the child's safety, stability or development

Reporting Obligations under the Child Information Sharing Scheme (CISS) and the Family Violence Information Sharing Scheme

CGGS is an information sharing school and early learning centre under both of these schemes.

The purpose of the Child Information Sharing Scheme and the Family Violence Information Sharing Scheme is to enable confidential information about vulnerable children and children at risk, including health information, to be shared. Under the Scheme, consent will not be required to keep a child safe. The school and early learning centre has a duty to respond to any request by an agency.

Should a request by an agency to share information under either of the above schemes be received, teaching staff must refer this request to the Deputy Principal or relevant Head of School, so the correct protocol is followed. The Principal must notify the School Council of this request to respond.

Refer to the Child Information Sharing Scheme (CISS) and the Family Violence Information Sharing Scheme Guidelines.

Mandatory Reporting Obligations

Mandatory reporting is a legal requirement under the *Children, Youth and Families Act 2005 (Vic.)* (CYFA) 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 **17 years** of age or younger.

If, in the course of carrying out their duties, a Mandatory Reporter forms a **reasonable belief** that a child is in need of protection from physical harm or sexual abuse, and that the **child's parents are unwilling or unable to protect the child**, they must report that belief to DHHS Child Protection and/or Victoria Police, as soon as possible after forming the belief.

IT IS A CRIMINAL OFFENCE NOT TO REPORT IN THESE CIRCUMSTANCES

Mandatory Reporters

Mandatory Reporters at CGGS include:

- The Principal
- Deputy Principal
- Head of School
- All Victorian Institute of Teaching (VIT) registered teachers
- Any persons who have been granted permission to teach by the VIT
- The school nurse(s)
- The school counsellor(s)
- People in religious ministry, without exemption for religious confessions Mandatory reporters must follow the [Four Critical Actions](#) to ensure they fulfil all their legal obligations.

Refer to [Appendix 2](#) for further details.

Non-Mandatory Reporters

Although only Mandatory Reporters have a legal responsibility to report suspected or actual child abuse, everyone who is employed at, or engaged by CGGS in child-connected work, has a moral responsibility and duty of care to report known or possible child abuse - physical, sexual, emotional & neglect. Non-Mandatory reporters should always refer any child safety concerns they have to a Child Safety Officer as they may be liable to report child abuse arising under other reporting obligations such as Reportable Conduct, criminal offences, and duty of care obligations. A Child Safety Officer will be able to assess the situation and determine the required course of action.

Types of abuse that are required to be reported

Under the CYFA, Mandatory Reporters must report to the Police and/or DHHS Child Protection under the following circumstances:

- Physical injury to a child
- Sexual abuse to a child
- Sexual offence to a child

Refer to the appendix for details on the physical and behavioural indicators of child abuse.

Protection for Staff Members

A Mandatory Reporter is legally and professionally protected and therefore cannot be successfully sued or subjected to any legal liability, nor can they be disciplined for unprofessional conduct by their professional body, for a report made by them in good faith.

Under the CYFA, the identity of a Mandatory Reporter remains confidential unless:

- the reporter chooses to inform the student and/or the student's parents/carers themselves
- the reporter consents in writing to have their identity disclosed
- the court decides that it needs the identity to ensure the safety and wellbeing of the student and/or
- the court decides that in the interests of justice, the reporter is required to attend court to provide evidence

Criminal Offences

In response to the *Betrayal of Trust Report*, the Victorian Government introduced criminal offences to protect children from sexual abuse. Under these reforms a failure to report or act in relation to suspected child sexual abuse (including grooming), constitutes a criminal offence.

Failure to disclose

Any adult who forms a reasonable belief that a sexual offence (including grooming) has been committed in Victoria by an adult against a child under 16 must disclose that information to Victoria Police.

Failure to disclose the information to Victoria Police is a criminal offence under Section 327 of the *Crimes Act 1958* (Vic.) and applies to **all adults (18 years and over)** in Victoria, not just professionals who work with children. The obligation is to disclose that information to the Police as soon as it is practicable to do so.

Grooming

Grooming is a criminal offence under Section 49B(2) of the *Crimes Act 1958* (Vic.) and occurs when an adult engages in predatory conduct to prepare a child under the age of 16 years for sexual abuse at a later time. Grooming can include communicating by words or conduct. Grooming may not necessarily involve sexual activity, it may involve attempting to befriend or establish a relationship or other emotional connection with the child or their parent/carer for the purpose of facilitating sexual activity at a later time.

Grooming can be conducted in person or online, for example via interaction through social media, web forums and emails. The offence can be committed by any person aged 18 years or over. It does not apply to communication between people who are both under 18 years of age. It does not include summary offences, such as 'up skirting' (to film another person's private parts) and indecent behaviour in public.

Examples of grooming behaviours may include:

- giving gifts or special attention to a child or their parent or carer (this can make a child feel special or indebted to an adult)
- controlling a child through threats, manipulation, force, or use of authority (this can make a child fearful to report unwanted behaviour)
- making close physical contact, such as inappropriate tickling and wrestling
- openly exposing or pretending to accidentally expose the victim to nudity, sexual material, and sexual acts

Exceptions

A person will not be guilty of the offence if they have a reasonable excuse for not disclosing the information. A reasonable excuse includes:

- A reasonable fear for their own or another person's safety. Failing to disclose a sexual offence based on concerns for the interests of the perpetrator or School (e.g., concerns about reputation, legal liability, or financial status) is not regarded as a reasonable excuse.

- A reasonable belief that the information has already been disclosed to Victoria Police or DHHS Child Protection and the person has no new information to add to the disclosure.
- The victim is aged 16 years or over and requests confidentiality
- The perpetrator is a child when they formed a reasonable belief
- The information is privileged
- The information is a confidential communication disclosed to a counsellor or a registered medical practitioner
- The information is in the public domain
- Police officers are acting in the course of their duty.

Failure to protect

Any school staff member in a position of authority who becomes aware that an adult associated with the School (such as an employee, contractor, volunteer, sport coach or visitor) poses a risk of sexual abuse to a child **under 16**, who is in the care or supervision of the School, must take all reasonable steps to reduce or remove that risk. Failure to do so, is a criminal offence under Section 49C (2) of the *Crimes Act 1958* (Vic.).

At CGGS, a person of authority for the purposes of complying with the failure to protect reporting obligations includes members of the School Council, Principal, Deputy Principal and Heads of School.

Reportable Conduct Scheme

The Reportable Conduct Scheme is administered by the Commission for Children and Young People (CCYP). The Scheme provides for the reporting to the Commission of allegations of reportable conduct, or misconduct that may involve reportable conduct, committed by employees of the School. For the purpose of this policy, an employee is a person of or over the age of 18 years who is:

- An employee of the School, whether or not the person is employed in connection with any work or activities of the School that relate to children;
- Engaged by the School to provide services, including as a volunteer, contractor, office holder or officer, whether or not the person provides services to children.

Based on the above, reportable conduct may include misconduct from the following individuals:

- The Principal
- All CGGS staff members (teaching and professional services staff)
- Contractor
- Volunteer
- Visitor
- Minister of Religion
- Foster / Kinship carer
- Office Holder
- Officer
- Other position directly engaged by the School

However, student-to-student abuse is not covered by this Scheme.

Everyone involved in CGGS has a role to play and may disclose an allegation of reportable conduct involving an employee to the Commission or to the Principal.

The Reportable Conduct Scheme does not change a person's mandatory reporting or other reporting obligations. For example, school staff must still contact Victoria Police if they suspect a criminal offence involving a child has occurred, in addition to following the notification steps required by the Reportable Conduct Scheme.

Types of abuse that are required to be reported

Reportable conduct is:

- A sexual offence committed against, with or in the presence of, a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded;
- Sexual misconduct committed against, with or in the presence of, a child – sexual misconduct includes behaviour, physical contact or speech or other communication of a sexual nature, inappropriate touching, grooming behaviour and voyeurism;
- Physical violence committed against, with or in the presence of, a child;
- Any behaviour that causes significant emotional or psychological harm to a child; or
- Significant neglect of a child.

Organisational Duty of Care

In addition to the above reporting requirements, the School has an organisational duty of care to take reasonable precautions to prevent the abuse of a student (sexual or physical abuse) by an individual associated with the School while the student is under the School's supervision or authority.

The School maintains this duty of care by ensuring that it remains compliant with the Child Safe Standards and continues to take reasonable steps to minimise the risk of child abuse. This includes adopting the following reasonable precautions:

- Employment screening and reference checking
- Supervision and training
- Prohibiting adults from being alone with a student, and
- Encouraging students and staff to notify authorities or parents about any signs of unusual or aberrant behaviour

This organisational duty of care is non-delegable. The School is committed to taking reasonable precautions to prevent child abuse even when it engages third party suppliers and/or contractors.

3. IDENTIFYING SIGNS OF CHILD ABUSE

Child abuse can take many forms. The perpetrator may be a parent, carer, school staff member, volunteer, another adult or even another child. The nature of child abuse is complex and the severity broad. The abuse may occur over time and potential risk indicators are often difficult to detect. Below is a list of some of the possible types of child abuse recognised at CGGS:

- Student is abandoned by their parents/carers
- Concerns over the student's safety, health, and wellbeing
- The student's parents/carers are dead / incapacitated
- Emotional abuse
- Emotional or psychological harm
- Family conflict / breakdown
- Family violence
- Grooming
- Neglect
- Parenting problems
- Physical Injury
- Physical violence
- Pressure due to a family member's physical/mental illness, substance abuse or disability
- Problem sexual behaviours
- Sexual abuse
- Sexual misconduct

- Sexual offence
- Sexually abusive behaviours
- Social / economic disadvantage
- Young / isolated / unsupported families

Child abuse can have a significant effect on a student's physical or emotional health, development and wellbeing. The younger a student is, the more vulnerable she is to abuse and the more serious the consequences are likely to be. There can be physical and/or behavioural indicators of child abuse.

Refer to [Appendix 1](#) for examples of physical and behavioural indicators of child abuse.

4. RESPONDING TO CHILD ABUSE

Every person associated with CGGS has a responsibility to understand the important and specific role they have individually and collectively to ensure that the wellbeing and safety of all students at the School is at the forefront of all they do and every decision they make. This includes understanding their legal and moral reporting obligations in relation to child safety as well as the procedures for responding to and reporting child safety concerns to the relevant authorities.

The approach to responding and reporting child safety concerns at CGGS is based on the **Four Critical Actions for Schools** which is a joint reporting protocol involving the Victorian Department of Education and Training (DET), the Catholic Education Commission of Victoria Ltd (CECV) and Independent Schools Victoria (ISV).

Refer to [Appendix 2](#) for the process for responding to child safety concerns at CGGS.

All staff should refer to this reporting process as a guide. The first point of contact for all child safety concerns should be a Child Safety Officer.

Becoming aware of a child safety concern

An individual may become aware of a child safety concern if they:

- Witness an incident
- Form a suspicion / reasonable belief
- Receive a disclosure from a current student
- Receive a disclosure from a former student

Any awareness of a child safety concern must be actioned immediately by referring to the CGGS reporting process.

Forming a suspicion / reasonable belief

All suspicions that a student has been or may be in danger of being abused must be taken seriously. This includes abuse that is suspected to have occurred outside of school grounds and outside of school hours.

A person may form a suspicion or belief on reasonable grounds that a student is in need of protection if:

- A student states that they have been physically or sexually abused
- A student states that they know someone who has been physically or sexually abused (sometimes the student may be talking about themselves)
- Someone who knows the student states that the student has been physically or sexually abused
- A student shows signs of being physically or sexually abused
- The CGGS staff member is aware of persistent family violence or parental substance misuse, psychiatric illness or intellectual disability that is impacting on the student's safety, stability, or development

- The CGGS staff member observes signs or indicators of abuse, including non-accidental or unexplained injury, persistent neglect, poor care, or lack of appropriate supervision
- A student's actions or behaviour may place them at risk of significant harm and the student's parents are unwilling or unable to protect the child

Four critical actions for responding to child abuse

There are Four Critical Actions which must be taken when responding to and reporting a child safety concern:

1. Responding to an emergency
2. Reporting to authorities
3. Contacting parents/carers
4. Providing ongoing support

Critical Action 1: Responding to an emergency

This first step is only applicable if a student has **just been abused** or is at **immediate risk of harm to their health and safety**. If this is the case, the incident must be referred to a Child Safety Officer and the Principal notified immediately.

Upon referral to a Child Safety Officer, reasonable steps must be taken to protect the student, including:

- Separating the alleged victim and others involved, ensuring that if the parties involved are all present at the school that they are supervised separately by a school staff member
- Arranging and providing urgent medical assistance where necessary, including administering first aid or calling 000 for an ambulance
- Calling 000 for urgent police assistance if the person who is alleged to have engaged in the abuse poses an immediate risk to the health and safety of any person

If the child safety incident occurred at the school, reasonable steps should be taken to preserve the environment, clothing and any other items of evidence and prevent any potential witnesses from discussing the incident until the Police or relevant authorities arrive on the premises.

If it is determined that the student is not at risk of immediate harm, proceed to Critical Action 2.

Critical Action 2: Reporting to authorities

All forms and instances of suspected or alleged child abuse and child safety concerns must be reported to the relevant authorities in consultation with a Child Safety Officer.

There are different reporting procedures and to different authorities depending on:

- The type of abuse
- The severity of the abuse
- The source of the abuse (perpetrator)
- The role of the reporter

The Child Safety Officer upon receiving the information will assess the situation and determine the next course of action in accordance with the School's reporting protocol and in consultation with the Principal and other relevant stakeholders.

Referral to Child FIRST

A referral to Child FIRST will be considered by the School if, after taking into account the available information, the School forms a view that:

- The concerns have a low-to-moderate impact on the student
- The immediate safety of the student is not compromised

- The incident does not fall within the Mandatory Reporting obligations
- The referral to Child FIRST has been discussed with the student's parents/carers and all parties are supportive of this decision.

A referral to Child FIRST can connect students and their families to the services they need, when the following factors may affect a student's safety, stability, or development:

- Significant parenting problems that may be affecting the student's development
- Family conflict, including family breakdown
- Families under pressure due to a family member's physical or mental illness, substance abuse, disability, or bereavement
- Young, isolated and/or unsupported families
- Significant social or economic disadvantage that may adversely impact on a child's care or development
- Neglect from medical, surgical, remedial and/or basic care

Upon receiving a referral, the Child FIRST team will conduct further assessment of the family and may consult an experienced community-based Child Protection practitioner. This assessment may lead to the involvement of a local family services organisation. In most circumstances, Child FIRST will inform the referrer of the outcome of the referral.

Immediately following a referral to Child FIRST, a CGGS Child Safety Incident Report Form must be completed in consultation with a Child Safety Officer and handed to the Deputy Principal / Head of Senior School or Head of Junior School for secure, confidential storage by the Principal.

In the event that the student's parents/carers are not supportive of the referral, the matter may be referred to DHHS Child Protection.

Reporting to Child Protection (DHHS) and/or Victoria Police

Most students are best protected and cared for within their own family; however, when parents, carers or guardians are unwilling or unable to protect their children from significant harm, the protection of the student becomes the responsibility of the School and its wider community and, at times, requires statutory Child Protection intervention and/or the Police. CGGS plays an important role in the prevention of child abuse.

When a staff member, or others employed or engaged by the School forms a belief that a child has been harmed or is at risk of being harmed, they must take action that is immediate, respectful, and coordinated. They should refer to this policy and seek guidance from the School's Child Safety Officers. Refer to the appendix for a step-by-step guide to reporting.

Reporting to DHHS Child Protection and/or Police may fall within the Mandatory Reporting, duty of care and/or criminal offence reporting obligations.

Only children aged 17 and under are required to be reported by Mandatory Reporters under the Mandatory Reporting legislation.

Under the 'Failure to Disclose Offence' within the Criminal Act, Mandatory Reporters are required to report to Child Protection and the Police when a sexual offence has been committed against a child under 16 years of age by an adult.

Where a Mandatory Reporting incident involves an International Student on a CAAW arrangement with the School (Confirmation of Appropriate Accommodation and Welfare), CGGS will also contact the VRQA.

A report to Child Protection and/or Police will be considered by CGGS if, after taking into account all of the available information provided by the reporter, the School forms a view that a student is in need of protection because:

- The harm or risk of harm has a serious impact on the student's immediate safety, stability, or development
- The harm or risk of harm is persistent and entrenched and is likely to have a serious impact on the student's safety, stability or development

- The student's parents cannot, or will not, protect their child from harm
- The incident constitutes a criminal offence

The role of investigating an allegation of child abuse rests solely with Child Protection and/or the Police. Once the report has been made, the DHHS will then issue further instructions (based on the circumstance).

In order to maintain confidentiality, details relating to the report are only discussed with those involved.

Any external bodies/individuals seeking information regarding the report must be directed to the Principal or Deputy Principal /Head of Senior or Head of Junior School.

If the School decides not to make a mandatory report, this does not discharge the reporter's obligation to do so, if they have formed a reasonable belief that abuse may have occurred. The reporter is still legally obliged to make a mandatory report of their concerns.

Allegation of child abuse against an adult within the School

If CGGS receives information alleging that an adult within the School has acted inappropriately, or abused a child, the matter will be investigated immediately.

- The perpetrator will be stood down until all investigations have been concluded. These may include the Police, Victorian Institute of Teaching and internal investigations.
- Appropriate support will be offered to the student or students involved. This may include counselling, special consideration for assessment and other pastoral care.
- The School will seek expert legal advice.

The perpetrator under investigation will be advised to seek external legal advice and counselling.

Depending on the type of abuse, the School may also be liable for reporting to the CCYP under the Reportable Conduct Scheme.

Reportable Conduct Reporting Obligations

Reporting to the Commission for Children and Young People (CCYP)

Unlike Mandatory Reporting, duty of care and criminal offence reporting obligations which addresses the safety and wellbeing of the student, the Reportable Conduct Scheme places a focus on the misconduct of employees within or connected to the School that involves children.

Everyone involved with CGGS has a role to play and may disclose an allegation of reportable conduct involving an employee to the Commission or to the Principal. However, they must refer to this policy and seek guidance from the School's Child Safety Officers before proceeding to report to the CCYP. Refer to the appendix for a step-by-step guide to reporting.

Any person who has any information that leads them to form a reasonable belief that an employee of CGGS has committed:

- reportable conduct; or
- misconduct that may involve reportable conduct,

is encouraged to report such information to the Principal.

A report may be made to the Principal in a number of ways:

In writing	<p>Address your report to the Principal in a sealed envelope marked Private and confidential and deliver it to the School's reception or to the Principal's office.</p> <p>Alternatively, send your report by post in an envelope marked Private and confidential and addressed to:</p> <p>The Principal 2 Torrington Street Canterbury Victoria 3126</p>
By email	<p>Mark your email – Reportable Conduct – and send to:</p> <p>principal@cggs.vic.edu.au</p>
By telephone	<p>Call the School and advise that you wish to report an allegation of reportable conduct to the Principal:</p> <p>Telephone - +61 3 9813 1166</p>

A report may be made whether or not the conduct or misconduct is alleged to have occurred within the course of the employee's employment with CGGS.

If the person has information of a reportable allegation involving the Principal of CGGS, the person may directly notify the Commission for Children and Young People at:

Commission for Children and Young People
Level 18
570 Bourke Street
Melbourne Victoria 3000
Tel: (03) 8601 5281
email: childsafestandards@ccyp.vic.gov.au

The Principal is responsible for notifying the Commission of a reportable allegation in line with the Reportable Conduct Scheme and for investigating such allegations and providing the findings to the Commission.

If the Principal becomes aware of a reportable allegation against an employee of CGGS they will manage any immediate risks to children and notify the Commission in writing of the following:

Within 3 business days after becoming aware of the allegation	<p>The name and date of birth (if known) of the employee involved</p> <ul style="list-style-type: none"> • Whether Victoria Police has been contacted • Contact details for the School and the Principal
As soon as practicable and within 30 calendar days	<ul style="list-style-type: none"> • Details of the allegation • Details of the School's response to the allegation • Reasons for whether or not any disciplinary or other action is proposed • Any written response from the employee concerning the allegation that the employee wished to have considered in determining what, if any, disciplinary or other action should be taken

Advice on investigation – as soon as practicable	Name of investigator
---------------------------------------------------------	----------------------

Outcomes of investigation – as soon as practicable	A copy of the findings and reasons for the findings <ul style="list-style-type: none"> • Details of any disciplinary or other action that the Principal proposes to take • Reasons for taking or not taking any disciplinary or other action
Additional documents and information	Provide to the Commission any information or documents relating to the allegation or an investigation that it may request

Reportable allegation investigation

As soon as practicable after becoming aware of a reportable allegation against an employee, the Principal will commence an investigation, which may include appointing an independent investigator. Generally, the person appointed to conduct the investigation will decide on the appropriate process to undertake the investigation, taking into account the principles of natural justice, and will advise the parties of these matters.

The Investigator will, as soon as practicable:

- (a) Conduct an investigation into the allegation;
- (b) Conduct interviews of relevant persons and seek any further information the Investigator considers necessary;
- (c) Provide to the Principal a confidential report of his or her findings in relation to the allegation against the employee; and
- (d) if requested, make recommendations about what disciplinary or other action should be taken (if any).

The Principal will consider the findings, and recommendations if any, and determine what further action, if any, to take in relation to the allegations.

If an allegation involves a possible criminal offence, the Principal will first obtain clearance from Victoria Police before beginning an investigation.

Making additional reports

After a report to the relevant authorities have been made, the student may continue to be at risk and in need of protection. Any further observations should continue to be recorded and a report made on each separate occasion where a belief has been formed, on reasonable grounds, that a student is likely to be at risk and in need of protection.

CGGS has adopted a centralised child safety reporting protocol whereby all child safety concerns and reports must be referred to a Child Safety Officer. This ensures that all child safety reports related to a student is collated, managed, and stored in a central location reducing the risk of duplicate incident reporting.

Critical Action 3: Contacting parents / carers

The School does not require the permission of parents, carers, or guardians to make a report to Child Protection and/or Police nor is the School required to tell parents, carers or guardians that it has done so.

After a report is made to the relevant authorities, the next critical action to take is to contact parents / carers. However, the School will only contact parents / carers after seeking advice from the Police or DHHS, to ensure the safety of the student and not to compromise any investigation being conducted by the relevant authorities or agencies.

Advice from the Police or DHHS will depend on a number of factors, including:

- Whether the parents/carers of the child are alleged to have engaged in the abuse
- Whether a disclosure to the parents/carers may result in further abuse to the child
- Where the child is a mature minor (at least 17 years of age and assessed to be sufficiently mature and intelligent to make decisions for themselves) and has requested that their parents/carers not be notified
- Whether notifying parents/carers would adversely affect an investigation of the matter by external authorities.

Where DHHS and Victoria Police have advised that it is appropriate, CGGS will proceed to make sensitive and professional contact with parents/carers as soon as possible.

Critical Action 4: Providing ongoing support

Responding and reporting child abuse incidences at CGGS is a traumatic experience to all parties involved. Therefore, the School has in place support processes and systems to ensure that students and impacted staff members feel safe and supported.

Support provided to students at the School includes:

- Working with the student's parents to ensure the safety of the student while at School
- Convening a student support group made up of wellbeing staff and teachers to plan, support and monitor the affected student(s)
- Implementing a safety plan / student support plan which may include removing the alleged perpetrator from the student, or implementing a plan where there is no contact with the student, until the matter is resolved
- Referral to wellbeing professionals and community services
- Providing a supportive adult during interviews at school conducted by Police or DHHS.
- Never blaming or interrogating them
- Appointing a specific Child Safety Officer to oversee the student until the matter is resolved
- Taking into account the student's family background, Aboriginal or Torres Strait Islander heritage, cultural or linguistic background, or disability, for example, providing an interpreter for the student and the family
- Complying with any subpoenas and/or attending court

Any staff member involved in a child safety reporting incident (mandatory, reportable, criminal and/or duty of care obligations) will be offered appropriate support by the School. This includes:

- Employee Assistance Program
- Referral to Independent Schools Victoria

5. COMPLAINTS AND GRIEVANCES

CGGS has in place a Complaints Management Policy which covers complaints over matters such as, but not limited to – schooling, curriculum, teaching, care, service, another student, another teacher, and tuition fees.

However, for all child safety related matters, complainants and respondents should refer to this policy and seek guidance from the School's Child Safety Officers for further details.

Informal resolution process

The complainant wishes to make a complaint about a child safety related matter. They may do so by contacting the School or directly with the respondent against whom the complaint is made.

All complaints concerning child safety must be referred to a Child Safety Officer for review. If the complaint is made directly to the respondent, the respondent must inform a member of the Child Safety team to respond to the complaint. The Child Safety Officer will proceed to work with the complainant, the respondent and in consultation with specialised team members of the School (e.g., Principal, School counsellors, etc) to resolve the matter.

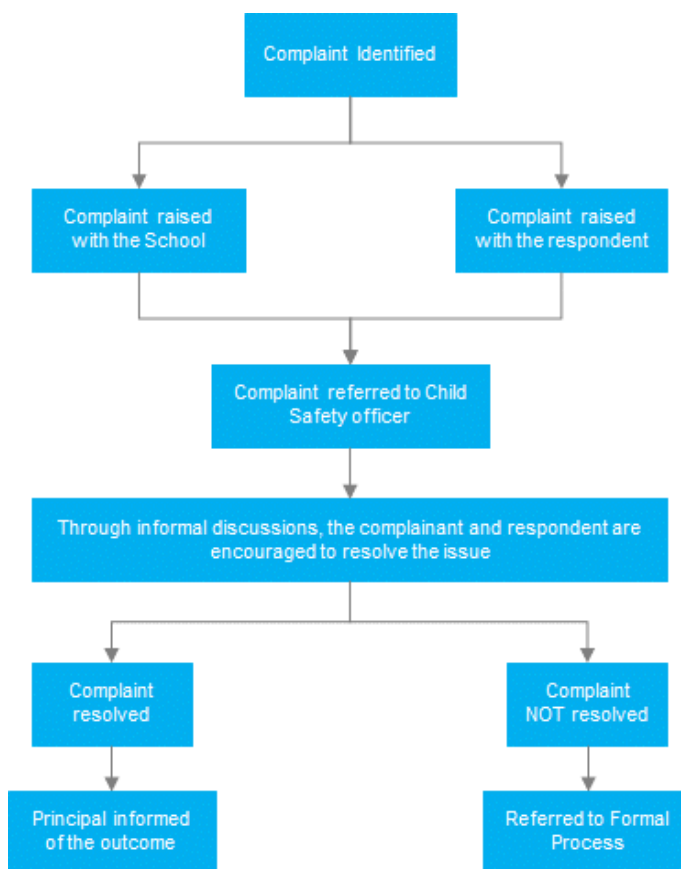
A resolution will be encouraged through informal discussion between the complainant and respondent.

All meetings, discussions, telephone calls or emails will be recorded and documented by the Child Safety Officer handling the complaint.

The Principal will be briefed about the complaint and the outcome of the process.

If the matter is not resolved informally, the complainant will be advised to submit a formal written complaint to the Principal.

INFORMAL RESOLUTION PROCESS



Formal resolution process

Before an investigation to a formal complaint is commenced, the complainant must have made reasonable attempts to resolve the complaint informally with the respondent in the first instance.

Step 1: Written complaint

If the concern or complaint is not resolved to the satisfaction of parents through the informal process, a formal complaint should be made in writing using the Formal Complaint Form at the end of this policy. The nature of the complaint should be clearly identifiable. If there is more than one problem, parents are advised to list the issues concisely and clearly note any steps taken to resolve the complaint, noting key facts such as what, where, when, how and any supporting evidence she/he may have, including witnesses, emails, photographs and texts.

All formal complaints are to be lodged with the Principal. If the complaint is in relation to the principal, the complaint should be made in writing using the formal complaints form and should be addressed to the Chair of the School Council.

All formal complaints received will be noted and acted on promptly by the Principal who receives the complaint. The School will acknowledge the complaint and provide a timeline for investigation. The School will make every effort to resolve a concern or complaint as quickly as possible however, if a complaint involves many students and/or a range of issues, the School may need more time to investigate and resolve it.

Upon receipt, the Principal will initiate the investigation process by delegating the complaint to an appropriate member of the Child Safety team.

Parents will be invited to meet with the Principal or senior member of the school to discuss the matter. Parents may choose to have someone support them at the meeting and this could be a relative or a friend however it is not appropriate for that person to be a legal representative.

Parents will be invited to review the completed form to confirm that the complaint has been accurately recorded.

If more than one parent or a set of parents raises the same or a substantially similar problem, each complaint will be managed separately.

Parents will also be asked to indicate, if legal, possible and practicable, how they would want the complaint to be resolved.

Conversations should be respectful and constructive. If the conversation becomes no longer conciliatory, either party may ask for the conversation to be temporarily halted and rescheduled for another time.

Step 2: Investigation

Some complaints can be resolved through discussion but others require that the problem or allegation be investigated before coming to a resolution.

The investigator will be a Child Safety Officer with sufficient skill and experience, not previously involved in the matter. If it is thought advisable and necessary, the Principal may appoint an external advisor as investigator.

In carrying out an investigation, the school will be mindful of the need for confidentiality. The parents will be informed in advance of any decision to speak to others during the course of the investigation.

The investigator will meet with the complainant and outline the principles that apply to the procedure to be followed.

The meeting will discuss the matter thoroughly, ideally using the following steps:

- a clear description and understanding of the issue
- the claimed impact and whom it impacts
- what is claimed will happen if the issue is not resolved
- what action(s) is requested in order to resolve the complaint.

These steps will be summarised briefly and will be included in the documentation of the process.

At each step of the process, all those attending the meeting will have the opportunity to put forward their point of view and will be treated with dignity and respect.

It may not be possible to agree the way forward in just one meeting; in this case further meetings will be scheduled until all those involved agree the issue has been considered as thoroughly as needed

At any time in the process, the investigator:

- May choose to contact the parents of any students involved,
- May choose to interview any witnesses identified by the complainant, check the accuracy of the evidence before making a written statement of the evidence given by the witnesses.
- Will offer the complainant the opportunity to meet with the Principal to discuss the complaint and provide additional information where relevant.
- Will document, in writing, all meetings and interviews conducted during the formal process. Any supporting evidence such as emails, photographs or other documentation will be copied and attached to any written notes.
- Will review relevant information and documents.
- Will obtain any other relevant information or documentation that will assist in resolving the complaint.
- May seek advice, where appropriate, from individuals or organisations that may be able to assist in resolving the grievance.

Step 3: Outcome and resolution

The investigator will provide a written report to the Principal detailing all the evidence and a finding as to whether the complaint is substantiated or not.

All those involved should agree when the complaint (or an aspect of the complaint) is considered resolved. If not everyone agrees, the complaint procedures should continue until a resolution is found, even if the resolution is to agree that the complaint is dismissed or that no further action should be taken.

In resolving the issue, the following steps should be followed:

- a statement confirming that those involved consider the complaint (or an aspect of the complaint) is resolved
- how the complaint is resolved
- a description of each specific action or decision, including a note as to who is responsible for the action and by when.

These steps will be summarised briefly and will be included in the documentation of the process.

When the complaint is resolved (or dismissed), a follow up meeting or conversation should be scheduled to ensure that the agreed actions have been implemented and that there are no further matters outstanding.

If the decision concludes that the complaint is not substantiated, the complainant and the respondent will both be advised accordingly. Each party has the right to appeal and request an independent arbiter to review the decision.

If an appeal is lodged, the Principal will outsource to an independent arbiter to examine all of the evidence and advise accordingly. The independent arbiter's review will be final with Camberwell Girls Grammar School.

If the Principal believes that there is a risk of litigation, Camberwell Girls Grammar School Insurers and Chair of School Council must be notified.

Step 4: Review

The School reviews all data from the complaint and the complaint process and procedures to identify opportunities to improve its care and service.

Record Keeping

CGGS will keep consistent, well-structured, concise and complete information on file for current and future use.

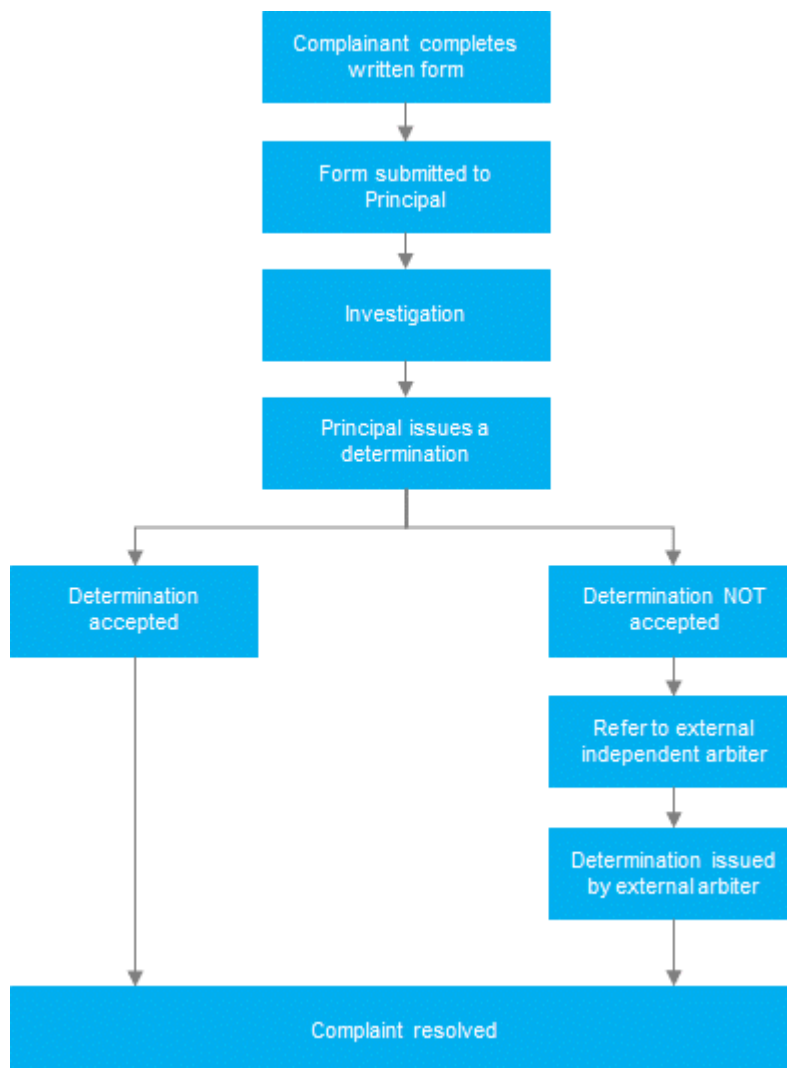
Parents will be provided with a copy of the record of the complaint.

The following documentation will form the record of the complaint:

- the formal complaints form, whether completed by the parents or by the school and confirmed by the parents.
- a record of the complaints meeting and the steps followed as set out above
- a record of the resolution as set out above
- a record of the follow up meeting.

The management of these records will follow the school's Record Management Policy. Except where dictated otherwise by law, the school will retain all records of complaints for a minimum of one year after the family or student has left the school and then will be destroyed. The records will be kept secured by the Principal or the School Council (in the case of a complaint made against the Principal) as is appropriate.

FORMAL RESOLUTION PROCESS



Complaints against the Principal or School Council

The Chair of CGGS School Council is responsible for receiving and managing written complaints against the Principal or a member of CGGS School Council.

The Deputy Chair of School Council is responsible for receiving and managing written complaints against the Chair of School Council.

Whistleblower process

CGGS recognises that people who have a work, service or client relationship with the School are often the first to realise there may be something seriously wrong. However, they may not wish to speak up for fear of appearing disloyal or may be concerned about being victimised or subject to other reprisals if they report the matter. No person should be personally disadvantaged for reporting a wrongdoing, especially in relation to child safety matters, whereby it may be mandatory to do so. The School is committed to compliance with all applicable laws and practices governed by the Commonwealth, State and Territory legislation.

Therefore, the School is committed to providing a supportive environment for the person wishing to discuss or report their concerns without fear of retaliatory action or retribution. When a person makes such a disclosure, they are entitled to expect that:

- Their identity remains confidential at all times to the extent permitted by law, and this is practicable in the circumstances
- They will be protected from retaliation, harassment, and victimisation

To demonstrate this commitment, the School has in place a Whistleblower Policy, available on the School's website which provides guidelines for any person or organisation associated with CGGS who may wish to discuss or report an actual or suspected wrongdoing.

6. ADMINISTRATION

Record keeping

Contemporaneous notes regarding disclosures or incidents will be recorded on the CGGS Child Safe Incident Report Form and be securely stored, remain confidential and retained by the Principal.

Records will include the following information:

- Date of disclosure
- Name of person raising the concern or allegation
- Witnesses to incidents
- Details of the report made to the relevant authorities
- Record of the procedure taken in response to the disclosure

Confidentiality

School staff must respect confidentiality when dealing with a case of suspected child abuse and/or neglect and must only discuss case details and the identity of the student and their family with those involved in managing the situation (that is the Principal, Deputy Principal, relevant Head of School or School Counsellors).

When a student has moved to another school, professional judgement is exercised as to the information that needs to be passed on. This will be determined by the Principal. Under the Child Information Sharing Scheme and the Family Violence Information Sharing Scheme sharing of confidential information about vulnerable children and children at risk, including health information, will be shared for the purpose of keeping children safe and minimise the impact of family violence for a child.

Resolving differences

Differences of opinion may occur between the School and DHHS and/or Police. In this instance, the 'best interest principles' noted in the CYFA is adhered to, which places the best interest of the student as priority.

A log of differences is maintained.

7. PREVENTION

Ongoing review

Following the resolution of alleged incidents or disclosures, a review of this policy and procedures is undertaken to ensure compliance with all legal requirements, and for continuous improvement.

Staff obligations to child safety

New staff, volunteers, contractors and others employed at or engaged by CGGS will be advised of this policy during their induction procedure. In addition, all staff, volunteers and contractors will receive refresher training about their child safety reporting responsibilities and be reminded of this policy annually.

All staff at CGGS take an active role, and are well informed of their obligations, in relation to Child Safety. The CGGS Commitment to Child Safety is incorporated into the School's employment cycle from recruitment and reference checking to induction, performance reviews and regular professional learning. Employment at CGGS is subject to Child Safe Standards school policies and codes of conduct being read, understood and adhered to.

Child Information Sharing Scheme (CISS) School Obligation

CGGS is an information sharing school under this scheme.

Child Information Sharing Scheme and Family Information Sharing Scheme Obligations

CGGS is an information sharing school under both of these schemes.

In accordance with the Child Information Sharing Scheme and the Family Violence Information Sharing Scheme, which is in place to enable confidential information about vulnerable children and children at risk, (including health information) be shared with other agencies, the school has an obligation to provide information without consent as the information required is for the purposes of protecting and keeping a child safe.

We have processes in place should we receive a request to share. Sharing of information between agencies under this scheme further promotes the wellbeing and safety of students and reduce any family violence.

If a request to share information under either of the above schemes is received, teaching staff should refer this request to the relevant Head of School. The Principal will notify the School Council of any request.

Screening and recruitment processes

CGGS has recruitment processes that result in the effective selection of suitable personnel, including staff, volunteers, contractors and ministers of religion. These processes will ensure:

- New and existing staff, volunteers and contractors understand the importance of child safety and are aware of CGGS's policies and procedures
- Each job or category of job for School staff that involves child-connected work has a clear statement that includes the job's requirements, duties, and responsibilities regarding child safety and the essential or relevant qualifications, experience and attributes in relation to child safety
- Compliance with School policy for recruitment and selection of staff for obtaining, verifying, and recording, information about a person whom it proposes to engage to perform child-connected work, including processes for screening and background reference checks

- Induction of new staff, volunteers and contractors into the School's policies, codes, practices and procedures governing child safety and child-connected work and
- A staff member's continuing suitability for child-connected work is monitored and assessed

All applicants for jobs that involve child-connected work for CGGS will be informed about the School's child safety practices and policies and its Child Safety Code of Conduct.

Refer to the Recruitment and Selection policy for further details.

8. CONTACT DETAILS

DEPARTMENT OF HEALTH AND HUMAN SERVICES (DHHS CHILD PROTECTION)

Metropolitan Regions / Intake Unit Regional Office:	
Eastern Intake Unit	Ph: 1300 360 391
Box Hill	Ph: (03) 9843 6000
After Hours Child Protection Emergency Services (AHCPEs)	
Statewide number for all emergency Child Protection matters outside normal business hours (24 hours, 7 days a week)	
Ph: 131 278	
For all other enquiries, please contact the appropriate regional office.	

VICTORIA POLICE

Sexual Offences and Child Abuse Investigation Team (SOCIT) Box Hill: Ph: (03) 8892 3292	
Camberwell Police Station	Ph: (03) 9882 0688
Emergency Number	Ph: 000

CHILD FIRST

Child FIRST	
Eastern Yarra Ranges, Knox, Maroondah	Ph: 1300 369 146
Monash, Whitehorse, Manningham, Boroondara	Ph: 1300 762 125
For all other enquiries, please contact the appropriate regional office.	

Communication

The school community will be informed about this policy. It will be publicly available. It will be available on the School's website and communicated in the School's newsletters, personnel induction programs and during recruitment and enrolment processes for staff, contractors, and volunteers.

Further questions regarding this policy should be addressed to the designated Child Safety Officers.

Links to other Policies

- Child Safety and Wellbeing Policy
- Statement of Commitment to Child Safety
- Codes of Conduct (including Child Safety)
- Student Welfare and Safety Policy
- Complaints Policy
- Whistleblower Policy
- Records Management Policy

Legislative Requirements

- Child Wellbeing and Safety Act 2005 (Vic)
- Child Wellbeing and Safety Amendment (Child Safe Standards) Act 2015 (Vic)
- Children Legislation Amendment (Reportable Conduct) Act 2017 (Vic)
- Children Youth and Families Act 2005 (Vic)
- Crimes Act 1958 (Vic)
- Crimes Amendment (Grooming) Act 2014 (Vic)
- Child Wellbeing and Safety (Protection of Children) Act 2014
- Education and Training Reform Act 2006 (Vic)

Standards and Guidelines

Ministerial Order 1359 – Implementing the Child Safe Standards – Managing the risk of child abuse in schools and boarding premises.

Other Documents

Child Safety Risk Register.

Policy Review

CGGS is committed to the continuous improvement of the child safety program and initiatives. The program is regularly reviewed for overall effectiveness and to ensure compliance with all child protection related laws, regulations, and standards.

Unless otherwise stated, this policy remains in place until it is superseded by an amended version. This policy will be reviewed annually or more often as circumstances require.

Next scheduled review date is November 2023.

Version Control

Version No.	Author	Date Approved	Comments
1.0	Risk and Compliance Manager	05.02.2019	Initial version
2.0	Risk and Compliance Manager	21.02.2020	Revised Policy Review section Updated Mandatory Reporters list to coincide with legislative changes Includes Child Abuse definition which incorporates grooming under the Crimes Act 1958
3.0	Risk and Compliance Manager	13.07.2021	Updated Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS) legislative requirements
4.0	Risk and Compliance Manager	27.01.2023	Updated Child Safety Statement Inclusion of Child Related Work and Investigator definition Appendix 3: Formal Complaint Form

Appendix 1: Definitions of child abuse and indicators of harm

The following definitions are provided to assist licensed children's services and school staff to decide if abuse is occurring and to assist them in deciding whether the impact warrants a report to Child Protection, a referral to Child FIRST services or whether another action is required.

PHYSICAL ABUSE

Physical abuse consists of any non-accidental form of injury or serious physical harm inflicted on a child or young person by any person. Physical abuse does not mean reasonable discipline, though it may result from excessive or inappropriate discipline. Physical abuse can include beating, shaking, burning and assault with implements.

Physical injury and significant harm to a child or young person may also result from the failure of a parent, carer, or guardian to adequately ensure the safety of a child, exposing the child to extremely dangerous or life-threatening situations. Physical abuse also includes fabricated illness syndrome (previously known as Munchausen's syndrome by proxy) and female genital mutilation (FGM). FGM comprises all procedures that involve partial or total removal of the female external genitalia and/or injury to the female organs for cultural or any non-therapeutic reasons.

Possible Indicators:

Physical

- bruises or welts on facial areas and other areas of the body, including back, bottom, legs; arms and inner thighs. Any bruises or welts in unusual configurations, or those that look like the object used to make the injury, for example fingerprints or handprints, buckles, iron, or teeth
- burns that show the shape of the object used to make them, such as an iron, grill, cigarette; or burns from boiling water, oil, or flames
- fractures of the skull, jaw, nose, and limbs, especially those not consistent with the explanation offered or with the type of injury probable/possible at the child's age and development
- cuts and grazes to the mouth, lips, gums, eye area, ears, and external genitalia
- human bite marks
- bald patches where hair has been pulled out
- multiple injuries, old and new
- poisoning and/or
- internal injuries

Behavioural

- disclosure of an injury inflicted by someone else (parent, carer, or guardian), or an inconsistent or unlikely explanation or inability to remember the cause of injury
- unusual fear of physical contact with adults (for example, flinches if unexpectedly touched)
- wearing clothes unsuitable for weather conditions (such as long-sleeved tops) to hide injuries
- wariness or fear of a parent, carer, or guardian; reluctant to go home
- no reaction or little emotion displayed when hurt
- little or no fear when threatened
- habitual absences from school and licensed children's services without explanations (the parent, carer or guardian may be keeping the child or young person away until signs of injury have disappeared)
- overly compliant, shy, withdrawn, passive and uncommunicative
- fearfulness when other children cry or shout
- unusually nervous or hyperactive, aggressive, disruptive, and destructive to self-and/or others
- excessively friendly with strangers
- regressive behaviour, such as bed-wetting or soiling

- poor sleeping patterns, fear of dark, nightmares
- sadness and frequent crying
- drug or alcohol misuse
- poor memory and concentration and/or
- suicide attempts

SEXUAL ABUSE

A child is sexually abused when any person uses their authority or power over the child or young person to engage in sexual activity. Child sexual abuse involves a wide range of sexual activity and may include fondling genitals; masturbation; oral sex; vaginal or anal penetration by finger, penis or any other object; voyeurism and exhibitionism. It can also include exploitation through pornography or prostitution.

Possible Indicators:

Physical

- injury to the genital or rectal area, such as bruising or bleeding
- vaginal or anal bleeding or discharge
- discomfort in urinating or defecating
- presence of foreign bodies in vagina and/or rectum
- inflammation and infection of genital area
- sexually transmitted diseases
- pregnancy, especially in very young adolescents
- bruising and other injury to breasts, buttocks, and thighs
- anxiety-related illnesses, such as anorexia or bulimia and/or
- frequent urinary tract infections

Behavioural

- disclosure of sexual abuse
- persistent and age-inappropriate sexual activity, including excessive masturbation, masturbation with objects, rubbing genitals against adults, playing games that act out a sexually abusive event
- drawings or descriptions in stories that are sexually explicit and not age-appropriate
- fear of home, specific place, or particular adult; excessive fear of men or of women
- poor or deteriorating relationships with adults and peers
- poor self-care or personal hygiene
- arriving early at school and leaving late
- complaining of headaches, stomach pains or nausea without physiological basis
- frequent rocking, sucking, or biting
- sleeping difficulties
- reluctance to participate in physical or recreational activities
- regressive behaviour, such as bed-wetting or speech loss
- sudden accumulation of money or gifts
- truancy or running away from home
- delinquent or aggressive behaviour
- depression
- self-injurious behaviour, including drug or alcohol abuse, prostitution, self-mutilation, attempted suicide

- sudden decline in academic performance, poor memory, and concentration
- searing of provocative clothing, or layers of clothes to hide injuries and/or
- promiscuity

FAMILY VIOLENCE

Family violence is defined as violence (either actual or threatened) that occurs within a family, including physical, verbal, emotional, psychological, sexual, financial, and social abuse. When there are strong indicators that incidents of family violence are placing children at significant risk or danger, Child Protection must be informed. Family violence is a criminal offence and can be liable to prosecution.

Possible Indicators:

Physical

- speech disorders
- delays in physical development
- failure to thrive (without an organic cause)
- bruises or welts on facial areas and other areas of the body, including back, bottom, legs, arms, and inner thighs
- any bruises or welts in unusual configurations, or those that look like the object used to make the injury, for example, fingerprints or handprints, buckles, iron, or teeth
- fractures of the skull, jaw, nose, and limbs, especially those not consistent with the explanation offered or with the type of injury probable/possible at the child's age and development
- cuts and grazes to the mouth, lips, gums, eye area, ears, and external genitalia
- multiple injuries, old and new and/or
- internal injuries

Behavioural

- overly compliant, shy, withdrawn, passive and uncommunicative
- extremely demanding, aggressive, attention-seeking behaviour
- antisocial, destructive behaviour
- low tolerance or frustration
- showing wariness or distrust of adults
- demonstrated fear of parents, carers, or guardians and of going home
- becoming very passive and compliant
- depression
- anxiety and/or
- criminal activity

RISK TAKING BEHAVIOUR

While risk-taking behaviour in adolescence is a normal aspect of healthy development, some behaviour may require attention from Child Protection when it carries potentially severe or life-threatening consequences. Examples include severe alcohol or drug use; unsafe sexual activity, including prostitution; solvent abuse and chroming; and violent or dangerous peer group activity (for example train-surfing).

There are community services that work with young people and their families when children are engaged in risk-taking behaviours. Parents, carers, or guardians can contact their local government to find these services or may wish to contact the police if the risk-taking activity is illegal and extreme in nature or poses a high risk to the child or young person.

EMOTIONAL ABUSE

Emotional abuse occurs when a child or young person is repeatedly rejected, isolated, or frightened by threats or by witnessing family violence. It also includes hostility, derogatory name-calling and putdowns, or persistent coldness from a person to the extent that the behaviour of the child or young person is disturbed, or their emotional development is at serious risk of being impaired.

Psychological or emotional abuse may occur with or without other forms of abuse. The child or young person may develop personality or behavioural disorders, or become filled with self-doubt and internalised rage, unable to form sustained and intimate relationships. There are few physical indicators, although emotional abuse may cause delays in emotional, mental, or even physical development.

Possible Indicators:

Physical

- speech disorders
- delays in physical development and/or
- failure to thrive (without an organic cause)

Behavioural

- overly compliant, passive, and undemanding behaviour
- extremely demanding, aggressive, attention-seeking behaviour
- antisocial, destructive behaviour
- low tolerance or frustration
- unexplained mood swings
- behaviours that are not age-appropriate, for example overly adult (parenting of other children), or overly infantile (thumb sucking, rocking, wetting, or soiling)
- mental or emotional delays
- fear of failure, overly high standards, and excessive neatness
- depression, suicidal thoughts, or actions
- running away
- violent drawings or writing and/or
- contact with other children forbidden

NEGLECT

Neglect includes a failure to provide the child or young person with an adequate standard of nutrition, medical care, clothing, shelter, or supervision to the extent that the health or development of the child is significantly impaired or placed at serious risk. A child is neglected if they are left uncared for over long periods of time or abandoned. Types of neglect are discussed below.

Serious Neglect

Serious neglect includes situations where a parent consistently fails to meet the child's basic needs for food, shelter, hygiene, or adequate supervision to the extent that the consequences for the child are severe. For example, the child's home environment is filthy or hazardous in the extreme and poses a threat to the child's immediate safety or development and is characterised by the presence of animal or human faeces or urine, decomposing food, syringes, or other dangerous paraphernalia;

- the child is provided with consistently insufficient or inadequate food or nourishment for healthy development
- the child has a serious medical condition for which the parent has consistently failed to obtain treatment or dispense prescribed medication and/or
- the parent consistently leaves the child unattended, or exposed to or in the care of strangers who may harm the child

Medical Neglect

Neglect of medical care refers to a situation in which a parent's refusal of, or failure to seek, treatment or to agree to a certain medical procedure leads to an unacceptable deprivation of the child's basic rights to life or health.

Possible Indicators:

Physical

- consistently dirty and unwashed
- consistently inappropriately dressed for weather conditions
- consistently without adequate supervision and at risk of injury or harm
- consistently hungry, tired and listless, falling asleep
- unattended health problems and lack of routine medical care
- inadequate shelter and unsafe or unsanitary conditions
- abandonment by parents and/or
- failure to thrive

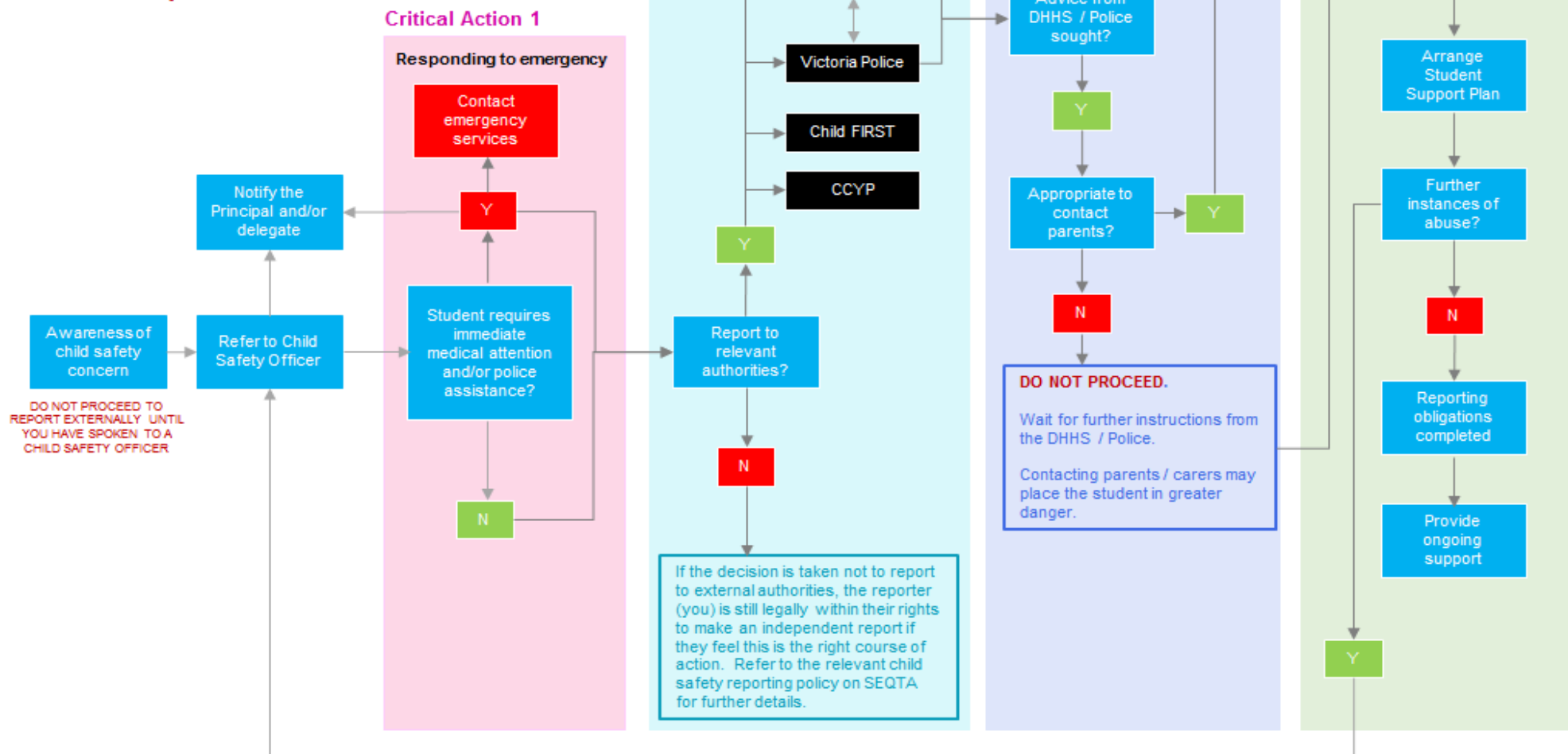
Behavioural

- begging or stealing food
- gorging when food is available
- inability to eat when extremely hungry
- alienated from peers
- withdrawn, listless, pale, and thin
- aggressive behaviour
- delinquent acts, for example vandalism, drug and alcohol abuse
- little positive interaction with parent, carer, or guardian and/or
- appearing miserable or irritable
- poor socialising habits
- excessively friendly with strangers
- indiscriminate with affection
- poor, irregular or non-attendance at school or kindergarten or childcare
- staying at school long hours
- self-destructive
- dropping out of school and/or
- taking on an adult role of caring for parent

Appendix 2: Responding to a child safety concern (Four Critical Actions)

Responding to child abuse / child safety concern

At no time should a member of staff, volunteer, contractor or others employed or engaged by CGGS attempt to hold information, manage an issue, counsel the student(s) without reporting the allegation or concern to a Child Safety Officer.



Appendix 3: Formal Complaint Form



FORMAL COMPLAINT FORM

Complainant's Contact Details			Date lodged
Full Name		Phone	
Address		Email	

Nature of Complaint

Complaint Details
<ul style="list-style-type: none">• Describe the incident and/or your concerns• Include key dates and times, such as when the incident occurred• Details of telephone conversations or emails (attach copies)• Any other relevant information

Preferred Outcome