



Child Abuse Identification and Response Policy - PROTECT

Introduction

Antonine College Ltd (ACL) is a Catholic College in the Tradition of the Maronite Antonine Sisters (MAS). As a MAS College, ACL aims to serve the community by providing a high-quality Catholic education within the wider context of Catholic Education in Australia.

Antonine College Ltd is an incorporated entity and as such is governed by a Board of Directors who ensure a strategic approach to the College's future.

The [Statement of Mission](#) in the constitution of Antonine College Ltd, sets out the sets out the Archbishop's expectations of Catholic schooling in the Archdiocese and provides an important context and grounding for the company and the direction which ACL Board must always observe in the pursuit of the company's objects.

The Board must ensure that all policies and procedures concerning the operations of ACL are consistent with the Statement of Mission and company objects, as well as any directions issued by the Archbishop from time to time.

Purpose

The purpose of this Policy is to:

- Describe how ACL staff (which includes ACL board directors, board committee members, school staff, volunteers, contractors, other service providers, clergy and those in religious ministry) identify and respond to child abuse concerns, including grooming.
- Ensure staff use the 4 Critical Actions to identify and respond to child abuse, including grooming, based on the source of abuse.
- Ensure ACL staff which includes the ACL board directors, board committee members, school staff, volunteers, contractors, other service providers and those in religious ministry are aware of and comply with their reporting and legal obligations, including mandatory reporting and reportable conduct obligations, to protect the safety and wellbeing of children and young people.
- Explain training requirements.

Scope

This policy applies to all ACL board in respect of:

- All ACL management
- ACL employees including principals, teachers, other school staff members, casual relief staff, volunteers, contractors, other service providers and those providing religious ministries in ACL.
- All students while they are:
 - on school premises or engaged in school-related activities
 - participating in school-approved activities on or offsite, including excursions, camps, functions and sporting events, and programs delivered by third-party providers such as another school, registered training organisation or external provider.
- Parents and carers when interacting with students in a school context.



Principles

ACL is entrusted with the holistic education of the child, in partnership with parents/guardians/carers, who are the primary educators of their children. ACL 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.

As a governing authority ACL upholds their duty of care to students in all school environments and ACL is a place where children and young people can flourish.

ACL is committed to:

- Providing a safe, respectful and inclusive environment for all students with zero tolerance for child abuse in all settings.
- Listening to and empowering children and young people.
- Keeping children and young people safe.
- Receiving and managing reports of suspected child abuse in a way that is culturally safe and sensitive to the diverse circumstances of children and students, as well as providing support to vulnerable children and students.
- Ensuring that complainants can expect their concern or complaint to be taken seriously, to be dealt with in a way that is culturally safe, and to be responded to in a respectful, thorough and timely manner.
- Reporting complaints and concerns to relevant authorities where the law requires reporting, and cooperating with law enforcement.
- Ensuring that recordkeeping, reporting, privacy, legislated information sharing schemes, and employment law obligations will be complied with when receiving and handling reports or concerns of suspected child abuse.

Statement of Commitment

ACL is committed to creating and maintaining safe, respectful and inclusive environments for all students, with **zero tolerance for child abuse in any setting**.

In fulfilling this commitment, ACL will:

- Prioritise the safety, wellbeing and dignity of children and young people.
- Listen to, respect and empower children and young people.
- Prevent, identify and respond to child abuse and harm.
- Respond to reports or concerns in a culturally safe, sensitive and trauma-informed manner, including providing particular support to vulnerable children and students.
- Address all concerns and complaints seriously, respectfully and in a timely way.
- Report child abuse complaints and concerns to relevant authorities in accordance with legal obligations.
- Comply with all recordkeeping, reporting, privacy, legislated information sharing schemes, and employment law obligations.

Principles

The following principles underpin the Child Abuse Identification and Response Policy:

- Every student is inspired and enabled to flourish and enrich the world.
- ACL is responsible for safeguarding the safety and wellbeing of all students by identifying risks and implementing proactive measures to prevent reasonably foreseeable harm in school environments and school-approved activities.



- ACL owe a duty of care to all students and must maintain adequate facilities, resources, systems and practices to protect student health, safety and wellbeing.
- Student engagement and learning improve when students feel safe and expectations are clear, as outlined in Vision for Engagement.
- Strong, respectful partnerships with families and school communities are essential to creating safe, inclusive and enabling learning environments that prioritise student voice, wellbeing and dignity.
- ACL staff are responsible for maintaining and safeguarding the privacy, confidentiality and wellbeing of students in accordance with the Privacy Policy and Collection Notice.

Identifying and Responding to all forms of Child Abuse

ACL staff must act to protect children from child abuse, including grooming, in any physical or online school environment. Staff must identify and respond to child abuse in accordance with the Victorian Government's [4 Critical Actions](#).

4 Critical Actions

All staff must:

1. Identify child abuse
2. Support students in the school
3. Refer to community services
4. Report abuse to relevant authorities.

Throughout the 4 Critical Actions, staff must:

- [Respond to an emergency](#)
- [Adapt to changing circumstances](#)
- [Document their actions](#)

The 4 Critical Actions apply to all forms of child abuse, including:

- Abuse by an adult engaged, or previously engaged, by the school
- Student-to-student abuse, including harmful sexual behaviour
- Abuse occurring within the family
- Abuse occurring within the community.

Detailed guidance is available on the Department of Education's website:

- [Tailored resources for Catholic schools](#)
- [4 Critical Actions](#)

Abuse by an adult engaged by the school

All allegations, complaints, disclosures and concerns of abuse, including grooming, by an adult who is, or previously was, engaged by a school must be:

- Managed in accordance with the 4 Critical Actions to identify and respond to child abuse by an adult engaged by a Catholic school.
- Reported to the Reportable Conduct Scheme Team via:
 - email: rcs@macs.vic.edu.au
 - telephone: (03) 9267 4200.



The Reportable Conduct Scheme Team in collaboration with the Strategic Communications and Engagement Team, supports principals and Regional Offices to:

- Meet reporting and investigation obligations in accordance with the [Reportable Conduct Procedures](#)
- Assess and manage risks to students and the school community.
- Implement appropriate, timely and transparent communication where required, including in relation to criminal charges involving current or former staff.
- Ensure compliance with legal and child safety requirements.

Student-to-Student abuse, Including harmful sexual behaviour

School staff may be the sole adult able to identify student-on-student child abuse. Schools must apply the 4 Critical Actions to identify, respond to and manage concerns involving student-to-student abuse: www.vic.gov.au/identify-student-to-student-abuse-schools.

Where harmful sexual behaviour is identified or suspected, schools should ensure appropriate, timely and trauma-informed responses by:

- Seeking advice from the Student Wellbeing Information Support Service (SWISS) on 9267 0419
- Engaging appropriate external specialist services by contacting their [local sexual assault or harmful sexual behaviour service](#).

Abuse occurring within the family or community

Where there is reasonable belief that a student is at risk of abuse in the family or community, staff must act in accordance with the 4 Critical Actions to identify and respond to child abuse in the family: www.vic.gov.au/identify-child-abuse-family

Local Child abuse response policy and procedures

ACL must:

- Adopt, contextualise and maintain the Child Safety and Wellbeing procedure template and identify the designated child safety contacts
- ensure child safety contacts support staff and school leadership to implement the 4 Critical
- Actions and PROTECT guidance in response to all complaints, allegations or concerns of child abuse
- Publish this policy and procedures on the school's website.

Escalating concerns

If a staff member believes appropriate action has not been taken, they must:

- Escalate concerns to the principal.
- Escalate to the relevant regional office if they remain unsatisfied
- Report directly to the relevant authorities (for example, Victoria Police or Child Protection) in line with their legal obligations and child safety frameworks [legal obligations and child safety frameworks](#)

Allegations or concerns of abuse (including grooming)

- By a child safety contact, must be reported to the principal
- By a principal, must be reported in accordance with the [Reportable Conduct Policy](#)



Child Safety Frameworks and Legal Obligations

All staff must understand and comply with applicable legal obligations and child safety frameworks, as set out in [PROTECT](#), including:

- **Child Safe Standards:** implementing actions to create and maintain a child-safe organisation, in accordance with [\(Ministerial Order No. 1359\)](#).
- **Duty of Care:** taking reasonable steps to minimise risks of foreseeable harm to students.
- **Failure to disclose:** reporting to police a reasonable belief that a sexual offence been committed against a child, as set out in [Legal obligations and child safety frameworks](#)
- **Failure to protect:** taking action to reduce or remove known risks of child abuse, as set out in [Legal obligations and child safety frameworks](#)
- **Family Violence Multi-Agency Risk Assessment and Management for family violence (MARAM):** meeting obligations to identify, assess and manage family violence risk, as set out in: [Family Violence Support](#)
- **Information sharing schemes Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS):** sharing relevant information in accordance with [Child and Family Violence Information Sharing Schemes](#) and [Legal obligations and child safety frameworks](#).
- **Mandatory reporting:** reporting concerns to Child Protection where legal thresholds are met, as set out in [Legal obligations and child safety frameworks](#).

Training requirements

Schools must ensure all staff are equipped with the knowledge and skills required to comply with Child Safe Standard 8 and Ministerial Order 1359 (PDF) to effectively safeguard children and young people. At a minimum, schools must:

- require annual completion of child safety training by all relevant staff
- define the staff cohorts to whom training requirements apply
- retain evidence of training completion at the school level in accordance with recordkeeping requirements

Roles, Responsibilities and Reporting

Roles	Responsibilities	Reporting Requirement (if applicable)
Mandatory reporter	Completion of annual Mandatory Reporting training. Following required reporting obligations and processes.	Provision of evidence of training to the school.
Principals	Ensure that all relevant staff complete annual training in their Mandatory Reporting obligations, and that the school keeps up-to-date records of this. Where a staff member is unable to perform their role in responding to and/or reporting a matter to authorities, identify an appropriate alternative person and allocate responsibility for responding to and/or reporting the matter to that person.	
All ACL employees, including AVL board directors, board committee members, principals, teachers, other staff members, volunteers, contractors and those on religious Ministry	Be aware of and comply with their legal obligations to report suspected child abuse (this may include completing Mandatory Reporting training) and provide ongoing support to all students connected to the concern, complaint or allegation of child abuse. When dealing with an incident or disclosure of suspicion of child abuse, ensure that the principal and school leadership team are made aware. When a staff member who has witnessed a child abuse incident, received a disclosure or developed a suspicion of child abuse is unable to perform their role in responding to and/or reporting the matter, the staff member must inform the principal.	



Procedures

Procedures for mandatory reporting and responding to concerns regarding child abuse are documented separately. These include:

- PROTECT Procedure: Informing staff of reporting obligations.
- PROTECT Procedure: Police or DFFH Child Protection interviews at school.
- PROTECT Procedure: Responding to all forms of child abuse.
- PROTECT Procedure: Responding to offences under the Crimes Act 1958 (Vic.).
- PROTECT Procedure: Responding to police and Child Protection requests for further information.
- PROTECT Procedure: Responding to student sexual offending.

Definitions

Child abuse Child abuse includes:

- (a) any act committed against a Child involving:
 - (i) a sexual offence
 - (ii) an offence under section 49B(2) of the Crimes Act 1958 (grooming)
- (b) the infliction, on a Child, of:
 - (i) physical violence
 - (ii) serious emotional or psychological harm
- (c) serious neglect of a Child.

Child Information Sharing Scheme (CISS)

The CISS, implemented by the Victorian Government is a scheme enabling information sharing between authorised organisations to promote a child's wellbeing or safety. All Victorian children and young people from 0 to 18 years of age are covered by the CISS.

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 suspicions, incidents, disclosures or allegations of child abuse ([Ministerial Order No. 1359](#)).

Department of Education (DE)

Victorian government department that leads the delivery of education and development services to children, young people and adults. Family Violence Family violence is defined under the Family Violence Protection Act 2008 (Vic.) to include behaviour that causes a child to hear, witness or be exposed to the effects of family violence such as abusive, threatening, controlling or coercive behaviour. While family violence does not form part of the official definition of 'child abuse' in the Child Wellbeing and Safety Act 2005 (Vic.), the impact of family violence on a child can be a form of child abuse, for example, where it causes serious emotional or psychological harm to a child. A child can also be a direct victim of family violence.

Family Violence Information Sharing Scheme (FVISS)

Implemented by the Victorian government under the Family Violence Protection Act 2008. The scheme enables the sharing of information between authorised organisations to assess and manage family violence risk and supports effective assessment and management of family violence risk.



Grooming

Grooming refers to predatory conduct undertaken by an adult (18 years or over) to prepare a child for sexual activity later. It is a sexual offence under section 49M of the Crimes Act 1958 (Vic.) carrying a maximum 10-year term of imprisonment. Under section 49M, the adult's words or conduct must be intended to facilitate the child engaging or being involved in the commission of, or attempt to commit, a sexual offence by the adult or another adult

Mandatory Reporters

Mandatory reporters listed under the Children, Youth and Families Act 2005 (Vic.) include:

- VIT Registered teachers (including principals and early childhood teachers).
- School staff who have been granted permission to teach by VIT.
- Registered medical practitioners, nurses and midwives.
- People in religious ministry.
- Youth justice workers.
- Out-of-home-care workers (excluding voluntary and kinship carers).
- School counsellors including staff who provide direct support to students for mental, emotional and psychological wellbeing, including (but not limited to) school health and wellbeing staff, primary welfare officers, student wellbeing coordinators, mental health practitioners, and chaplains.

Mandatory Reporting

Mandatory reporting is the legal requirement under the Children, Youth and Families Act 2005 (Vic.) to protect children from harm relating to physical and sexual abuse. A child, for the purposes of the relevant parts of this Act, is any person under the age of 17 years ([PROTECT: Identifying and responding to all forms of abuse in Victorian schools](#)).

Physical Violence

Physical violence occurs when a child suffers or is likely to suffer significant harm from a nonaccidental injury or injuries inflicted by another person. Physical violence can be inflicted in many ways, including beating, shaking, burning or using weapons (such as belts and paddles). Physical harm may also be caused during student fights.

Policy

A high-level, principles-based directive that must be complied with across ACL and MAS

Procedure

A step-by-step or detailed instruction for the implementation of ACL policy that is mandatory.

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 [PROTECT: Identifying and Responding to All Forms of Abuse in Victorian Schools](#).



- A child or young person exhibits sexually abusive or age-inappropriate behaviour(s).
- Professional observations of the child's behaviour or development cause 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.

Reportable Allegation

A reportable allegation means any information that leads a person to form a reasonable belief that an employee has committed reportable conduct or misconduct that may involve reportable conduct, whether or not the conduct or misconduct is alleged to have occurred within the course of the person's employment.

Reportable Conduct

Reportable conduct for the purposes of the Reportable Conduct Scheme 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.
- Physical violence committed against, with or in the presence of, a child.
- Any behaviour that causes significant emotional or psychological harm to a child.
- Significant neglect of a child as defined in the Child Wellbeing and Safety Act 2005 (Vic).

Risk

Risk is defined as the effect of uncertainty on objectives. An effect is a deviation from the expected – positive and/or negative. Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances or knowledge) and the associated likelihood of occurrence.

Risk Management

The coordinated activities to direct and control an organisation regarding risk.

School/service environment

Means any of the following physical, online or virtual places used during or outside school/service hours:

- A campus of the school.
- Online or virtual school/service environments made available or authorised by ACL or ACL service for use by a child or student (including email, intranet systems, software, applications, collaboration tools and online services).
- Other locations provided by the school/service or through a third-party provider for a child or student to use including, but not limited to, locations used for camps, approved homestay accommodation, delivery of education and training, sporting events, excursions, competitions and other events) ([Ministerial Order No. 1359](#)).

School/Service Staff

Means an individual working in a school/service environment who is:

- Directly engaged or employed by ACL.
- A contracted service provider engaged by ACL (whether or not a body corporate and whether or not any other person is an intermediary) engaged to perform child-related work at ACL.



- A minister of religion, a religious leader or an employee or officer of a religious body associated with ACL ([Ministerial Order No. 1359](#)).

Serious Emotional or Psychological Harm

Serious emotional or psychological abuse may occur when a child is repeatedly rejected, isolated or frightened by threats or the witnessing of family violence. It also includes hostility, derogatory name-calling and put-downs, or persistent coldness from a person, to the extent where the behaviour of the child is disturbed, or their emotional development is at serious risk of being impaired. Serious emotional or psychological harm could also result from conduct that exploits a child without necessarily being criminal, such as encouraging a child to engage in inappropriate or risky behaviours.

Serious Neglect

Neglect includes a failure to provide a child with an adequate standard of nutrition, medical care, clothing, shelter or supervision. Significant neglect causes harm to a child that is more than trivial or temporary. Serious neglect is when the child is exposed to an extremely dangerous or lifethreatening situation and there is a continued failure to provide a child with the basic necessities of life.

Sexual Offences

For the purposes of this policy, a sexual offence occurs when a person involves a child in sexual activity, or deliberately puts the child in the presence of sexual behaviours that are exploitative or inappropriate to the child's age and development. Sexual offences are governed by the Crimes Act 1958 (Vic.). Sexual abuse can involve a wide range of sexual activity and may include fondling, masturbation, oral sex, penetration, voyeurism and exhibitionism. It can also include exploitation through pornography or prostitution.

Student

Student means a person who is enrolled at or attends ACL.

Student sexual offending

Student sexual offending means sexual behaviour by a student 10 years and over which may amount to a sexual offence. A sexual offence includes rape, sexual assault, indecent acts and other unwanted sexualised touching.

Under Victorian law:

- children between 12 to 15 can only consent to sexual activity with another child no more than 2 years older (therefore sexual contact by a student with a child outside of this age range may be student sexual offending).
- for a person to consent to sexual activity, they must have the capacity to understand the context and possible consequences of the act. Therefore sexual contact by a student involving a person with a cognitive impairment or affected by alcohol or other drugs may be student sexual offending.

Volunteer

A person who performs work without remuneration or reward for ACL, an ACL service in the school/service environment.

Related Policies and Documents

PROTECT Procedure: Informing staff of reporting obligations.

PROTECT Procedure: Police or DFFH Child Protection interviews at school.

PROTECT Procedure: Responding to all forms of child abuse.

PROTECT Procedure: Responding to offences under the Crimes Act 1958 (Vic.).

PROTECT Procedure: Responding to police and Child Protection requests for further information.



PROTECT Procedure: Responding to student sexual offending

Student Interview Template: Police or DFFH Child Protection interviews at school

Child Safety Code of Conduct

Child Safety and Wellbeing Policy

Child Safety and Wellbeing Record Keeping Policy

Complaints Handling Policy

ICT Acceptable Usage Policy

Duty of Care Policy

Pastoral Care Policy

Recruitment Policy

Reportable Conduct Policy

Supervision Policy

Legislation and standards

Child Wellbeing and Safety Act 2005 (Vic.)

Children, Youth and Families Act 2005 (Vic.)

Crimes Act 1958 (Vic.)

Education and Training Reform Act 2006 (Vic.)

Education and Training Reform Regulations 2017 (Vic.)

Family Violence Protection Act 2008 (Vic.)

Information Privacy Act 2000 (Vic.)

Ministerial Order 1359: Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools

Victorian Institute of Teaching Act 2001 (Vic.)

Working with Children Act 2006 (Vic.)

Wrongs Act 1958 (Vic.).

Policy Information Table

Responsible person	ACL Principal
Policy owner	ACL Principal
Approving authority	College Executive
Approval date	January 2025
Risk rating	High
Review by	July 2027
Publication details	SIMON , School website