



Reportable Conduct Policy

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.

Introduction

The [Statement of Mission](#) in the MACS Constitution, and the constitutions of its subsidiaries, 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.

ACL is committed to providing a safe environment for all children, students and young people, and takes active steps to protect them from neglect and abuse.

Our college and governing body maintain a comprehensive suite of child safety and wellbeing policies and strategies. These are embedded in our policies and procedures for child safety and wellbeing. In accordance with regulatory requirements, strategies are in place to identify, report and investigate any Reportable Allegations made pursuant to the Reportable Conduct Scheme (the Scheme), which is an allegations-based scheme.

All ACL Staff have a responsibility to understand the Scheme, this Reportable Conduct Policy for ACL (the Policy) and the roles that each individual plays in ensuring that Reportable Allegations are identified, reported and investigated. This is one way in which we can all provide for the safety and wellbeing of children and young people

Purpose

This Policy sets out the legal and regulatory obligations that apply to ACL under the Scheme, and outlines the processes, actions and strategies adopted by ACL to ensure compliance with the Scheme and the protection of children and young people in our school.

Scope

This Policy applies to any Reportable Allegations of:

- a sexual offence committed against, with or in the presence of a child
- sexual misconduct committed against, with, or in the presence of a child



- physical violence committed against, with, or in the presence of a child
- behaviour that causes significant emotional or psychological harm to a child and
- significant neglect of a child (collectively **Reportable Conduct**).

Additionally, the Policy applies to:

- all people who carry out work in any capacity for ACL, ACL employees, Board Directors, Board committee members, ACL Executives, Principals, volunteers, consultants, contractors, clergy and those in Religious Ministry as the context requires and
- workers and volunteers supplied by labour hire agencies, companies and other providers (e.g. casual relief teachers, some student teachers – depending on the arrangements), secondees, directors and office holders of companies performing services for ACL (Others) if they meet the following criteria:
 - they are supplied to ACL by labour hire agencies, companies and other providers, or they are seconded to ACL
 - they perform work in and as part of ACL; and
 - they are under the direction, supervision or control of ACL.

This Policy does not apply to Notifiable Conduct under the Disability Worker Regulation Scheme, established by the Disability Service Safeguards Act 2018 (Vic) which involves the regulation of registered and unregistered disability workers in Victoria. Notifiable Conduct relates to disability workers and is administered under the Disability Worker Regulation Scheme.

Principles

The Scheme is a child safety mechanism and is based on the following fundamental principles:

- The protection of children and young people is the paramount consideration in the context of allegations of child abuse or employee misconduct involving a child.
- Criminal conduct or suspected criminal conduct should be reported to Victoria Police (Police).
- A Police investigation into any matter must always have priority and the investigation into the Reportable Allegation may be suspended until the police advise that it may proceed.
- ACL works in collaboration with the regulator of the Scheme, the Commission for Children and Young People (CCYP), to ensure ACL is compliant with the Scheme to ensure the protection of students in our care.
- ACL Staff and Others covered by the Scheme who are the subject of Reportable Allegations are entitled to procedural fairness during investigations into their conduct.

Reportable Allegations

All ACL Staff have an obligation to recognise and report conduct or concerns that may lead them to form a Reasonable Belief that an ACL Staff member or Other has committed Reportable Conduct or misconduct that may involve Reportable Conduct. This obligation extends to conduct or misconduct that is alleged to have occurred within or outside the course of that person's employment or engagement.

Once identified, the conduct or concerns must be referred to the SSR (Social Services Regulator) for assessment as soon as possible. In addition to notifying the SSR, the individual making the notification (Notifier) should notify:

- the Principal if the conduct or concerns relate to an ACL Staff member or Other (other than a Principal) employed or engaged in ACL
- ACL Board Director if the conduct or concerns relate to a Principal of ACL; and



- ACL Principal if the conduct or concerns relate to an ACL Staff member or Other employed or engaged in ACL.

ACL Staff and Others who have Reportable Allegations made about them will be considered to be the Subject of Allegation(s) (SoA) until the consideration of the allegations is finalised.

NB: The Scheme requires certain allegations of past or historical Reportable Conduct to be notified to the SSR including where an employee is no longer employed by ACL or when the alleged conduct happened before the employee started working for ACL.

Taking immediate action

If allegations or concerns require the Notifier to comply with mandatory reporting obligations or involve suspected criminal conduct, the Notifier must first report them to the Department of Families, Fairness and Housing and/or Victoria Police respectively, as a priority.

Depending on the nature and seriousness of the alleged Reportable Conduct or misconduct, the Notifier, (likely, but not necessarily, the Principal of ACL), should take immediate steps to manage the risk posed by the SoA, to ensure the safety and wellbeing of the children or young people involved. Principal should consider supports that need to be put in place for the SoA.

Some immediate actions that may be taken include:

- reporting the matter to Victoria Police and or the Department of Families, Fairness and Housing (DFFH)
- pairing the SoA with a supervisor, mentor or learning support officer who can oversee and support them in their work
- directing the SoA not to attend the workplace
- directing the SoA to perform alternative duties
- directing the SoA to do or refrain from doing any other thing and the period for which this will occur; and
- advising the SoA of what support is available to them during the period in which the allegations are being investigated.

As part of managing any reporting obligation made about the SoA, the Principal of the school must provide pastoral and other support to any of the children or young people involved in ACL.

This is an ongoing responsibility during the entirety of the entire Reportable Conduct process. Pastoral and other support may include, but is not necessarily limited to, making any of the children or young people involved in the matter feel safe and supported in the school environment and taking steps to mitigate any harm or further harm to the children involved that could occur during the management of the entire Reportable Conduct process. Refer to the Protect – Identifying and Responding to Abuse – Reporting Obligations Policy and [Four Critical Actions](#) for more information.

Reporting Reportable Allegations

Please refer to the Reportable Conduct Procedures for more information on the reporting process. Where a three-day mandatory notification is made to the SSR about an SoA who is a registered or casual teacher or holds a permission to teach, SSR will notify the Victorian Institute of Teaching (VIT) about the allegations. VIT will then seek further information about the allegations from the Principal in accordance with the relevant sections of the Education and Training Reform Act 2006 (Vic).



Investigation of Reportable Conduct

ACL has established a system to investigate and respond to any Reportable Allegations made about a Staff and Others. The Reportable Conduct Procedures provide detailed information about the management of investigations.

In accordance with the Code of Conduct for ACL Staff, all ACL Staff are required to co-operate with any investigations being conducted by others.

During an investigation, the investigator(s) must provide the affected children and their families and/or guardians with an opportunity to participate in the investigation process to ensure that they are provided with a voice on matters that directly impact them.

In all cases, before any findings are made or disciplinary action is taken, the SoA must be:

- advised of the Reportable Allegation(s)
- advised of all information relevant to the Reportable Conduct investigation
- given a reasonable opportunity to respond to that information; and
- offered the appropriate support

At the conclusion of an investigation, a report will be prepared that sets out the Reportable Allegations and the findings made in relation to against each of the allegations.

Outcomes of investigations

The principal may determine to act in response to the findings in the investigation.

This may include:

- directing the SoA to:
 - perform work under the supervision of a specified employee
 - complete specified professional development
 - refrain from doing certain things
 - perform alternative duties
- issuing a formal warning
- terminating the employment of an employee
- terminating the agreement with a contractor and/or
- notifying a volunteer that they are no longer permitted to provide volunteer services for ACL

Other reporting obligations

The obligation to report allegations of Reportable Conduct to the SSR is in addition to any other reporting obligations. Refer to the Protect – Identifying and Responding to Abuse – Reporting Obligations Policy and Four Critical Actions for more information.

Failure to disclose

Under the Crimes Act 1958 (Vic) all adults must make a report to Victoria Police if they hold a reasonable belief that a sexual offence has been committed by an adult against a child under the age of 16 years.



Failure to protect

Under the Crimes Act 1958 (Vic) a person in a position of authority in an organisation must act to reduce or remove a substantial risk to a child under 16 years of age who is under their care or supervision who may become the victim of sexual abuse committed by an adult associated with their organisation.

If the alleged conduct is potentially criminal in nature, the Principal (or other notifier) should also make a report to the Victoria Police. In the case of a sexual offence that may have been committed against a child, this must be reported to Victoria Police. Failure to disclose/report is an offence. A police investigation into the allegations has first priority over the investigation into the Reportable Allegations.

Grooming

A person commits the offence of grooming if they are 18 years of age or more; and communicates, by words or conduct (whether or not a response is made to the communication), with another person who is a child under the age of 16 years; or the person under whose care, supervision or authority the child is; and they intend that the communication will facilitate the child under the age of 16 engaging or being involved in the commission of a sexual offence by them or by another person who is 18 years of age or more.

NB: Any staff member who forms a Reasonable Belief that another adult is grooming a child and/or their parents /carers, should report their concerns to Victoria Police by following the procedures in the PROTECT Procedures: Responding to all forms of child abuse. Failure to take reasonable steps to protect a child in the school from the substantial risk of sexual abuse from an adult associated with the school is a criminal offence under section 490 (1) of the Crimes Act 1958 (Vic).

Reporting to Victoria Police and Department of Families, Fairness and Housing

If allegations or concerns trigger mandatory reporting obligations or involve suspected criminal conduct, the Notifier must first report them to the Department of Families, Fairness and Housing and/or Victoria Police respectively.

Mandatory reporters

In the context of Victorian schools, a mandatory reporter includes Principals, registered teachers, early childhood teachers, school counsellors, persons in religious ministry, registered medical practitioners, registered psychologists and nurses.

It is a criminal offence for a mandatory reporter to fail to comply with this obligation.

NB1: All mandatory reporters must make a report to Victoria Police and/or the Department of Families, Fairness and Housing as soon as practicable for the purposes of the Children, Youth and Families Act 2005 if, during the course of carrying out their professional roles and responsibilities, they form a belief on reasonable grounds that a child has suffered or is likely to suffer significant harm, as a result of physical abuse and/or sexual abuse; and the child's parents have not protected, and are unable or unwilling to protect the child from harm of that type. It is a criminal offence for a mandatory reporter to fail to comply with this obligation.

NB2: ACL Staff must follow the Four Critical Actions when there is an incident, disclosure or suspicion of child abuse or student sexual offending. Refer to the Protect – Identifying and Responding to Abuse – Reporting Obligations Policy and [Four Critical Actions](#) for more information. Additionally, all mandatory reporters should report any other significant concerns for the wellbeing of a child to the Orange Door, which do not necessarily need to amount to abuse.



NB3: If the person who makes the mandatory report is employed in ACL, they must advise the Principal that they have made that report. This allows for other wellbeing concerns to be addressed in a school context.

Victorian Institute of Teaching (VIT)

Where a three-day mandatory notification is made to the SSR about an SoA who is a registered or casual teacher is, or holds a permission to teach, SSR will notify the Victorian Institute of Teaching (VIT) about the allegations. VIT will then seek further information about the allegations from the RCS Team in accordance with the relevant sections of the Education and Training Reform Act 2006 (Vic).

Recordkeeping

ACL maintains records of Reportable Allegations, written reports and Reportable Conduct investigation findings in accordance with the Public Record Office Victoria Recordkeeping Standards and ACL policies for information and records management and relevant policies and procedures for child safety and wellbeing.

Monitoring and review

In accordance with the Policy Governance Policy, ACL will regularly review policies and procedures to ensure they remain compliant with legal and regulatory requirements and consistent with best practice. Principals will be notified when this Policy is reviewed and are required to notify their school community through the school's usual communication channels.

Roles and Reporting Responsibilities

Role	Responsibility	Reporting requirement
Principal	Ensure ACL has systems in place to: - prevent the occurrence of Reportable Conduct - ensure Reportable Allegations are brought to immediate attention - notify SSR of allegations - investigate allegations of Reportable Conduct and respond to those allegations in accordance with the requirements of The Scheme - report findings of investigations to SSR - ensure appropriate actions are taken in response to any Reportable Obligations	Make reports to SSR in accordance with the Scheme
Deputy Principal, Compliance	Prepare report about ACL strategies for child safety and compliance with the Scheme	
Principal	- Ensure all Reportable Allegations are identified, taken seriously - Maintain recordkeeping practices to support investigations and to facilitate requests for information or documentation from ACL, Victoria Police, SSR or a regulator during an investigation that are compliant with the Scheme and relevant legislation	
All ACL Staff and school communities	Must notify the Principal, the Executive Director or CCYP of any Reportable Allegation about ACL Staff or Others	

Definitions

Child

Child means a child or young person who is under the age of 18 years. (Source: [Child Wellbeing and Safety Act 2005](#))



Social Services Regulator (SSR)

In February 2026, the SSR took over the Reportable Conduct Scheme from the Commission for Children and Young People (CCYP) as part of reforms to strengthen child safety.

Organisations subject to the Reportable Conduct Scheme are legally required to notify the SSR of allegations of reportable conduct against a child or young person by a worker or volunteer in their organisation.

Notifier

Person who makes the notification about alleged Reportable Conduct through one of the channels available.

Others or Other

In this Policy, Others or Other refers to workers and volunteers supplied by labour hire agencies, companies and other providers (e.g. casual relief teachers, some student teachers – depending on arrangements), secondees and directors and office holders of companies performing services for ACL if they meet all of the following criteria:

- they are supplied to ACL by labour hire agencies, companies and other providers, or they are seconded to ACL
- they perform work in and as part of ACL and
- they are under the direction, supervision or control of ACL

Reasonable Belief

A reasonable belief is more than suspicion. There must be some objective basis for the belief. However, it is not the same as having proof and does not require certainty. For example, a person is likely to reach a reasonable belief if they:

- observed the conduct themselves.
- heard directly from a child that the conduct occurred and
- received information from another credible source that the conduct occurred (including another person who witnessed the Reportable Conduct or misconduct that may involve Reportable Conduct).

Religious Ministry

A reference in this Policy to those in religious ministry includes clergy (e.g. a Cardinal, Archbishop, Bishop, Priest, Chaplains Religious Sister, Religious Brother, Deacon) or Seminarian, lay ecclesial ministers including pastoral associates, those engaged in chaplaincy and persons residing at the presbytery or on the grounds of the parish, agency or entity.

Reportable Allegation

Reportable Allegation means any information that leads a person to form a reasonable belief that an ACL Staff member or Other 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 is defined as:

- 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.

Reportable Conduct Scheme

The Reportable Conduct Scheme is a child protection scheme that requires certain Victorian organisations, including schools, to notify the Commission for Children and Young People (CCYP) if there is an allegation of Reportable Conduct made against one of its employees, contractors, or volunteers. The organisation is also required to investigate the allegation and report its findings and any action taken to the CCYP.

Seconded

People who are employed by a provider and are supplied to another organisation to work for a temporary secondment period.

Subject of Allegations (SoA)

Person about whom Reportable Allegations about Reportable Conduct or misconduct that may involve Reportable Conduct are made.

Related Policies and Documents

Supporting documents

Reportable Conduct Procedures

Related ACL Policies and Documents

Child Safety and Wellbeing Policy

Child Safety and Wellbeing Recordkeeping Procedures

Code of Conduct for ACL Staff

Code of Conduct – Parents

Complaints Handling Policy for ACL Schools

PROTECT: Identifying and Responding to Abuse – Reporting Obligations 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)

Public Records Act 1973 (Vic)

Policy Information Table

Responsible person	ACL Principal
Policy owner	ACL Principal
Approving authority	College Executive
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Reviewed by	July 2027
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