Melbourne Archdiocese
Catholic Schools

Responding to All Forms of Child Abuse

PROECT Procedures

1. Introduction

Melbourne Archdiocese Catholic Schools Ltd (**MACS**) schools operate with the consent of the Catholic Archbishop of Melbourne and are owned, operated and governed by MACS.

2. Purpose

To ensure that all MACS Staff are aware of and follow their obligations in recognising and reporting suspected child abuse.

3. Scope

All MACS staff members (which includes the MACS board directors, board committee members, school staff, volunteers, contractors, other service providers, clergy and those in religious ministry, collectively **MACS Staff**) must take any complaint or concern relating to child abuse seriously. Staff have a range of reporting and legal obligations to report suspected child abuse and provide ongoing support. These obligations may overlap, and multiple reports may need to be made in a single circumstance, depending on whether child abuse occurs within the school, or within the family or community. Obligations include:

- the Victorian Child Safe Standards
- the Reportable Conduct Scheme
- mandatory reporting
- criminal offences – failure to disclose, failure to protect and grooming
- duty of care
- responding to student sexual offending
- responding to significant concerns for the wellbeing of a child.

4. Requirement to respond

Staff must act, and follow the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse, as soon as they become aware of a child abuse incident – that is, when a child is experiencing, or is at risk of experiencing, abuse. Staff must ensure that they act promptly and thoroughly in their response. Any response to a child safety complaint or concern must not undermine a student's right to privacy, access to information, social connections or learning opportunities.

4.1. Child abuse in the school environment

The Reportable Conduct Scheme was created under the *Child Wellbeing and Safety Act 2005* (Vic) and requires the Head of Entity (the Executive Director of MACS) to notify the Commission for Children and Young People (CCYP) if an allegation of reportable conduct (a reportable allegation) is made against one of its employees.

Employees can include a Principal, teacher, administrative or corporate staff member, board or school advisory council member, contractor, volunteer, school doctor/nurse/medical professional, allied health staff member, or minister of religion or religious leader. It may also include former employees.

If an incident or allegation involves an employee at the school or Others who fall under the Reportable Conduct Scheme, MACS Staff must follow the Reportable Conduct Policy.

4.2. Child abuse within the family or community

In circumstances where an incident or allegation of child abuse occurs within the family or community and does not involve a school employee, staff must follow the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse for guidance with respect to reporting requirements.

5. Becoming aware of a child abuse incident

There are a number of ways which staff may become aware that a child is experiencing, or is at risk of experiencing, abuse:

Event	Responsibility
Witnessing an incident	Any staff who witness an incident and believe a child has been subjected to, or may be at risk of, abuse, including exposure to family violence, must first take immediate action (refer to Critical Action 1: Responding to an emergency below) to protect the safety of the child or children involved.
Forming a suspicion or reasonable belief	All suspicions that a child has been, is being or is at risk of being, abused must be taken seriously, including suspicions that the abuse is taking or may take place outside school grounds or areas. If suspicion develops into a reasonable belief, staff must act. 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.
Receiving a disclosure about or from a current student *The role of staff remains the same if disclosures are made by a past student, parent/guardian/carer, a sibling or a peer, or if disclosures involve family violence.*	All disclosures must be treated seriously and the Four Critical Actions followed. Staff must reassure and support a child or young person who makes a disclosure of abuse and ensure that the disclosure is taken seriously. Staff should never promise to keep any disclosures confidential, as all disclosures of abuse must be reported. For strategies on how to manage a disclosure, refer to PROTECT: Identifying and Responding to All Forms of Abuse in Victorian Schools and the PROTECT page on the CEVN website https://cevn.cecv.catholic.edu.au under *Student Support / PROTECT*.
Receiving a disclosure about or from a former student	If a disclosure is received from a former student about historical abuse, staff must act. If the former student is currently of school age and attending a Victorian school – follow the Four Critical Actions as soon as practicable. If the former student is no longer of school age or attending a Victorian school – report the disclosure to the Department of Families, Fairness and Housing (DFFH) Child Protection and/or Victoria Police. If the disclosure received from a former student relates to a school staff member – follow the Reportable Conduct Policy.

5.1. Notes and records

All staff are to keep clear and comprehensive notes relating to incidents, disclosures and allegations of child abuse and may find it helpful to use the PROTECT: Responding to Suspected Child Abuse: A Template for all Victorian Schools.

If a staff member decides not to make a report, they must accurately document their notes relating to the incident, disclosure or allegation of child abuse.

Notes and records must be kept securely in accordance with the *Public Records Act 1973* (Vic) and Child Safety and Wellbeing Recordkeeping Procedures.

6. Four Critical Actions

There are Four Critical Actions for Schools, which must be taken when responding to and reporting a child abuse incident, disclosure or suspicion:

Critical Action 1: Responding to an emergency	
This first step is only applicable if a child has just been abused or is at risk of immediate harm. *If this is not the case, go straight to Critical Action 2: Reporting to Authorities.*	If the child has just been abused or is at risk of immediate harm, staff must take reasonable steps to protect the child, including: • separating the alleged victim and others involved, ensuring that if the parties involved are all present at the school, 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 abuse incident has occurred at school or in a school environment, reasonable steps must be taken to preserve the environment, the clothing and other items, and to prevent any potential witnesses (including school staff members, volunteers and contractors) from discussing the incident until Victoria Police or relevant authorities arrive on the premises.	

Critical Action 2: Reporting to authorities	
All forms and instances of suspected or alleged child abuse must be reported as soon as possible to the appropriate authorities. *Failure to report physical and sexual child abuse may amount to a criminal offence.* **In all cases, staff members must report internally to the principal or, if the principal is involved in the allegation, the leadership team.**	**Keep notes** Keep comprehensive notes that are dated and include: • a description of the concerns (e.g. physical injuries, student behaviour) • the source of those concerns (e.g. observation, report from child or another person) • the actions taken as a result of the concerns (e.g. consultation with the principal, report to DFFH Child Protection). The template provided in PROTECT: Responding to Suspected Child Abuse: A Template for all Victorian Schools can be used. Ensure all notes are stored according to the *Public Records Act 1973* (Vic) and Child Safety and Wellbeing Recordkeeping Procedures.
	Discuss concerns Due to the complexity of child abuse incidents, disclosures and suspicions, it is recommended that concerns and observations regarding suspected physical or sexual abuse of a child are discussed with:

Critical Action 2: Reporting to authorities	
	• the principal or a member of the leadership team • and/or the General Manager (Regions) • and/or the MACS Student Wellbeing Information and Support Service (SWISS). This is not a legal requirement; however, it will help to ensure support is provided to all involved in matters of this nature. The confidentiality of these discussions must be maintained. Staff (particularly mandatory reporters) must then make their own assessment about whether to make a report about the child or young person and to whom the report should be made. The duty to report abuse or suspicions of abuse exists even if the principal, member of the leadership team or a representative of MACS advises you not to proceed with reporting suspected abuse.
	Gather and document information The relevant information necessary to make the report includes: • full name, date of birth and residential address of the child or young person • details of the concerns and the reasons for those concerns • your involvement with the child or young person • details of any other agencies involved with the child or young person. This information can documented using PROTECT: Responding to Suspected Child Abuse: A Template for all Victorian Schools. It is critical that completing the template does not impact on reporting times – if a child is in immediate danger, staff need to report the matter to Victoria Police immediately.
	Make the report ***To report concerns which are life-threatening, phone 000 or the local police station.*** Where the source of the abuse comes from within the school community (the suspected or alleged abuse involves a school staff member, volunteer, allied health practitioner, officer/office holder, contractor or visitor at the school): • contact Victoria Police, who will contact DFFH Child Protection when appropriate • report internally to the principal. If the principal is involved in the allegation, this must be reported to another member of the leadership team, the General Manager (Regions) or directly to the MACS Executive Director via the Reportable Conduct Team • the principal or leadership team are to contact the Reportable Conduct Team who oversee the Reportable Conduct Scheme within MACS • follow the Reportable Conduct Policy. Where the source of the suspected or alleged abuse comes from within the child's family or community, you must: • report sexual abuse and grooming to Victoria Police • report the matter to DFFH Child Protection if you consider the child to be in need of protection due to child abuse, or that they have been, are being, or are at risk of being harmed due to any form of abuse, including family violence. If after hours, call the Child Protection Emergency Service on 13 12 78

Critical Action 2: Reporting to authorities	
	• report internally to the principal, or a member of the leadership team if the principal is unavailable • contact MACS SWISS.
	Document written records of report Make a written record of the report, including: • the date and time of the report, and a summary of what was reported • the name and position of the person who made the report • the name, position and contact details of the person who received the report. All additional information provided to either Victoria Police or DFFH Child Protection must be stored securely and maintained indefinitely by the school to ensure that records are accessible upon request by external authorities investigating the matter.
	Additional steps for overseas students Where a child abuse incident, disclosure or suspicion involves an international student at the school and the school has issued a Confirmation of Appropriate Accommodation and Welfare (CAAW) letter for that student (thereby assuming responsibility for the child's accommodation, support and general welfare), the school will also need to contact the Victorian Registration and Qualifications Authority (VRQA).
	Making additional reports If after a report is made, staff continue to suspect that a child is 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 reasonable belief has been formed that a child is likely to be at risk and in need of protection. Where a staff member is aware that another school staff member has formed a reasonable belief about the same child on the same occasion, or based on the same indicators of abuse, and has made a report to the appropriate authority, the staff member need not make a further report. However, if the staff member has formed a reasonable belief of abuse or significant risk of abuse to the child based on different observations, further indicators or additional information, a further report must be made to the appropriate authority detailing this additional information.
	Other Concerns If a staff member believes that a child is not subject to abuse, including family violence, but still holds significant concerns for their wellbeing (e.g. risk-taking behaviour, parenting difficulties, isolation from family or lack of support), **they must still act**. A report to The Orange Door should be made if: • there is significant concern for a child's wellbeing • there are concerns about circumstances that have a low-to-moderate impact on the child • the child's immediate safety is not compromised • school staff have discussed the referral to The Orange Door with the child's parents or carers, and all parties are supportive of this decision. Where there is a belief that the child's parents or carers will not be supportive of the referral, or the child is partaking in any risk-taking activity that is illegal and extreme in nature or poses a high risk to the child or others, the matter may still be

Critical Action 2: Reporting to authorities

referred to DFFH Child Protection.

If staff are unsure of what action to take in response to concerns about a child, they must speak to the principal or a member of the school's leadership team or contact DFFH Child Protection or The Orange Door for further advice.

Schools can also contact the MACS Legal or the MACS SWISS for advice.

Critical Action 3: Contacting parents and carers

Where it is suspected that a child has been or is at risk of being abused, the parents or carers of the child should be notified as soon as practicable after a report is made to the authorities.

However, ***school staff must always seek advice from Victoria Police or DFFH Child Protection*** *to ensure that it is appropriate to contact the parents/guardians/carers.*

In circumstances of family violence, staff should:

- take care not to inadvertently alert the alleged perpetrator by notifying parents or carers as it could increase risk of harm to the child, other family members or school staff
- seek advice from DFFH Child Protection or The Orange Door before alerting parents or carers about safe strategies for communicating with a parent or carer who is experiencing family violence and seek advice on recommending family violence support services.

Advice from Victoria Police or DFFH Child Protection will depend on several factors, including whether:

- the parents or carers of the child or young person are alleged to have engaged in the abuse (including suspected family violence)
- a disclosure to the parents or carers may result in further abuse to the child
- the child is a mature minor and assessed to be sufficiently mature and intelligent to make decisions for themselves and has requested that their parents or carers not be notified – the school should insist that another responsible adult is notified in lieu of the parents or carers
- the notification of parents or carers would adversely affect an investigation of the matter by external authorities.

Where the suspicion of abuse or risk of abuse has not yet warranted a reasonable belief, parents or carers should also be notified promptly after the school has carefully considered the factors listed above.

In some circumstances, a child may have returned to the care of their parent or carer before advice has been received from Victoria Police or DFFH Child Protection. In these circumstances, staff members should not share any information with the parent or carer that may place the child or any other person at risk, or where the child is a mature minor.

Critical Action 4: Providing ongoing support

Staff members who witness a child abuse incident, receive a disclosure or develop a suspicion of child abuse (including exposure to family violence) have a critical role to play in supporting students impacted by the child abuse matter to ensure that they feel supported and safe at the school.

Support provided to students includes (but is not limited to):

- regular communication with the student or students and their parents or carers where appropriate
- a Student Support Group of school wellbeing staff and teachers to plan, support and monitor affected students
- Student Support Plans for students impacted by the incident to ensure appropriate levels of care and support are provided
- access to counselling
- contacting MACS SWISS for information regarding the range of school-based support services that may be

	available (e.g. SAFEMinds, referrals to family violence services, Centres Against Sexual Assault (CASA) or headspace). MACS, as the governing authority and our school have a duty to provide support to school staff members who have witnessed an incident or disclosure, or who have made a report to external authorities about a reasonable belief of child abuse. Staff members may have also experienced child abuse (including family violence) or be experiencing family violence and abuse in their own lives. Staff members requiring wellbeing support can contact the school's Employee Assistance Program (EAP) provider. A review of the reporting process must occur four to six weeks after a report has been made to identify if any further follow-up support actions are needed.
	Providing developmentally and culturally appropriate support While a child or young person's background should not impact a decision to report suspected abuse, it is important to be sensitive to their individual circumstances when providing support and working with families impacted by abuse. Considering the diversity of all children may include (but not be limited to): • Children with disabilities – consider their chronological age, developmental age and cognitive functioning to tailor developmentally appropriate support strategies – consider vulnerability to ongoing abuse. • Aboriginal and Torres Strait Islander children – consider culturally appropriate support. • Children from Culturally and Linguistically Diverse (CALD) backgrounds – consider culturally appropriate support that ensures the child's safety and wellbeing – engage interpreters as necessary to assist communication and engagement with family members. • Children from refugee backgrounds – trauma, dislocation and loss may impact both the child/young person and their family. Specialist support services may be consulted as required – engage interpreters as necessary to assist communication and engagement with family members. • International students • additional supports must be considered given the child's family may not be present to provide support in the home environment.

7. Potential consequences of making a report

Consideration	
Confidentiality	The identity of a reporter must remain confidential unless: • the reporter chooses to inform the child, young person or parent of the report • the reporter consents in writing to their identity being disclosed

Consideration	
	• a court or tribunal decides that it is necessary for the identity of the reporter to be disclosed, to ensure the safety and wellbeing of the child • a court or tribunal decides that, in the interests of justice, the reporter is required to provide evidence. In the event there is a breach of your confidentiality, and the above exceptions do not apply, please contact the MACS Legal.
Professional protection	If a report is made in good faith: • it does not constitute unprofessional conduct or a breach of professional ethics on the part of the reporter • the reporter cannot be held legally liable in respect of the report.
Interviews	DFFH Child Protection and/or Victoria Police may conduct interviews of children and young people at the school without their parent or carer's knowledge or consent. When external authorities are investigating a report of abuse or risk of abuse, it is the role of the principal to ensure that students are supported throughout interviews at the school. For more information, refer to Police and Child Protection Interviews at School: PROTECT Procedure.
Support for the child or young person	The roles and responsibilities of the principal or other staff in supporting children who are involved with DFFH Child Protection may include: • acting as a support person for the child or young person • attending DFFH Child Protection case-planning meetings • observing and monitoring the child's behaviour • liaising with professionals.
Requests for information	DFFH Child Protection and/or The Orange Door and/or Victoria Police may request information about the child or family for the purpose of investigating a report and assessing the risk to the child or young person. For further information, refer to Responding to Police and Child Protection Requests for further information: PROTECT Procedures
Witness summons	If DFFH Child Protection makes a protection application in the Children's Court of Victoria, any party to the application may issue a witness summons to produce documents and/or to give evidence in the proceedings. Where schools receive a subpoena or witness summons, they should contact the MACS Legal for support and advice.
Responding to complaints or concerns	Complaints about MACS management of child abuse incidents may be received. These complaints may be made by parents, carers or others. The Complaints Handling Policy must be followed to ensure all complaints, concerns and feedback on school policies, procedures and processes are effectively captured and appropriately managed. If the complaint raises concerns that child abuse or the risk of child abuse has gone unreported, or provides further information about a report, the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse must be followed to ensure that any new information received through a complaint or concern is reported to authorities where required.

8. Definitions

Refer to the Protect Policy or Glossary of Terms for definitions of terms used in this procedure.

9. Support

MACS Child Safety Team provides support to schools on child safety and wellbeing
Email: childsafety@macs.vic.edu.au
Phone: 9267 0228

MACS Legal seeks to provide schools with support and advice on legal matters.
Phone: 9267 0228
Email: legal@macs.vic.edu.au

MACS Student Wellbeing Information and Support Service (SWISS) seeks to address matters that impact the wellbeing and educational outcomes of young people arising using a solution-focused framework, and empower and enhance the capacity, competence and confidence of staff to address matters related to the wellbeing of young people.
Phone: 9267 0228
Email: swb@macs.vic.edu.au

10. Related policies and documents

Supporting documents

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

Related MACS policies and documents

Child Safety and Wellbeing Policy
Child Safety and Wellbeing Policy – Schools
Child Safety and Wellbeing Recordkeeping Procedures
Child Safety Recruitment Procedures
Code of Conduct for MACS Staff
PROTECT: Identifying and Responding to Abuse – Reporting Obligations Policy
Reportable Conduct Policy

Resources

Charter of Human Rights and Responsibilities Act 2006 (Vic) Child Information Sharing Scheme
Child Information Sharing and Family Violence Reforms on the CEVN website DET Mature Minors and Decision Making (2020)
Family Violence Information Sharing Scheme
Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse
Four Critical Actions for Schools: Responding to Student Sexual Offending National Framework for Protecting Australia's Children 2021–2031
PROTECT on the CEVN Website (schools only, log in required)
PROTECT: Identifying and Responding to All Forms of Abuse in Victorian Schools PROTECT: Identifying and Responding to Student Sexual Offending
PROTECT: Responding to Suspected Child Abuse: A Template for all Victorian Schools PROTECT: Responding to Student Sexual Offending: Principal Checklist
PROTECT: Responding to Student Sexual Offending: A Template for all Victorian Schools

Policy information table

Approving executive	Director, Child Safety and Risk
Procedure owner	General Manager, Child Safety
Approval date	1 July 2025
Review by	July 2027
Related policy	PROTECT: Identifying and Responding to Abuse – Reporting Obligations Policy
Publication	CEVN, Gabriel, school website
Superseded documents	PROTECT Procedure: Responding to All Forms of Child Abuse – v1.0 – 2023 PROTECT Procedure: Responding to All Forms of Child Abuse – v2.0 – 2024