



Responding to and Reporting Allegations of Abuse

PURPOSE

Ballarat Grammar is committed to ensuring a safe environment for all students, free from abuse and harm. These procedures outline the required actions for responding to and reporting allegations, suspicions, or disclosures of child abuse in compliance with Ministerial Order 1359, the Victorian Child Safe Standards, and relevant State and Commonwealth laws.

This document provides a clear process for identifying, responding to, and reporting allegations of child abuse. It applies to all staff, volunteers, contractors, and visitors, ensuring that any concern regarding child safety is addressed promptly and appropriately.

SCOPE

This procedure applies to all school activities, including:

- On-campus learning and extracurricular activities.
- Boarding and homestay environments.
- Online and digital communication spaces.
- Off-campus activities, excursions, and camps.
- Engagement with external education providers.

DEFINITIONS

Definitions of child abuse and related concepts can be found in the *Student Safety Definitions and Additional Resources* document. Child abuse includes physical violence, sexual abuse, grooming, emotional or psychological harm, neglect, and family violence.

Term	Definition
CCYP	Commission for Children and Young People
DFFH	Department of Families, Fairness and Housing – Child Protection
VIT	Victorian Institute of Teaching

REPORTING RESPONSIBILITIES

All school staff and volunteers have a legal and ethical obligation to report suspected or disclosed child abuse. Failure to report may result in disciplinary action and legal consequences.

Staff must report concerns to:

- A Student Safeguarding Officer.
- The Headmaster, if appropriate.
- External authorities, as required (e.g., DFFH Child Protection, Victoria Police, CCYP).

IMMEDIATE ACTIONS

If a student is at immediate risk of harm, staff must:

- Ensure the student's safety by separating them from the alleged perpetrator.
- Provide first aid, if required.
- Call 000 for urgent medical or police assistance.
- Preserve evidence if a crime is believed to have occurred.





INTERNAL REPORTING PROCESS

When a concern arises, staff must:

- Complete a Student Safety Report form and submit it to a Student Safeguarding Officer.
- Document the concern in Synergetic (internal student management system).
- Consult with the Student Safeguarding Officer to determine further action.
- Ensure confidentiality throughout the reporting process.

EXTERNAL REPORTING PROCESS

In accordance with legal obligations, reports must be made to the following agencies when required:

- Victoria Police (000) in cases of sexual abuse, physical assault, or immediate risk.
- Department of Families, Fairness and Housing (DFFH) – Child Protection for cases of neglect, emotional harm, or family violence.
- Commission for Children and Young People (CCYP) for reportable conduct allegations against school staff.
- Victorian Institute of Teaching (VIT) if the concern involves a registered teacher.

SUPPORT FOR STUDENTS AND STAFF

Ballarat Grammar provides a range of supports for students affected by student safety concerns, including:

- Counselling and wellbeing services.
- Referral to external child protection agencies.
- Confidential staff debriefing sessions.

COMMUNICATION WITH PARENTS/CARERS

Decisions about informing parents will be made in consultation with Child Protection or Victoria Police to ensure student safety. In some cases, parental notification may be delayed to prevent further risk.

RECORD KEEPING

All student safety reports must be accurate, confidential, and securely stored in accordance with the Public Record Office Victoria Recordkeeping Standards. Records must be retained for a minimum of seven years.

POLICY COMPLIANCE AND REVIEW

All staff, volunteers and those engaged by Ballarat Grammar are expected to enact this policy in support of student and community learning, health, safety and wellbeing. Any breach of a Student Safety program document is a student safety incident that must be reported internally. Any breach that meets the threshold for external reporting must also be reported to the relevant external authority.

This procedure is reviewed annually to ensure compliance with updated legislation and best practices. The Senior Student Safeguarding Officer oversees the review and implementation of any necessary updates.

GOVERNANCE DOCUMENT RESPONSIBILITIES AND COMMUNICATIONS

All documentation within the Governance Framework will be communicated throughout the School including, but not limited to, internal communications such as Nexus posts, staff emails, staff inductions and documentation distribution.

Document Owners are responsible for identifying and managing information-related risks and issues for their assigned information entities and for escalating these to Approval Authorities accordingly. Owners of Governance Documents are accountable for their respective procedures, manuals and work instructions in alignment with their position descriptions.

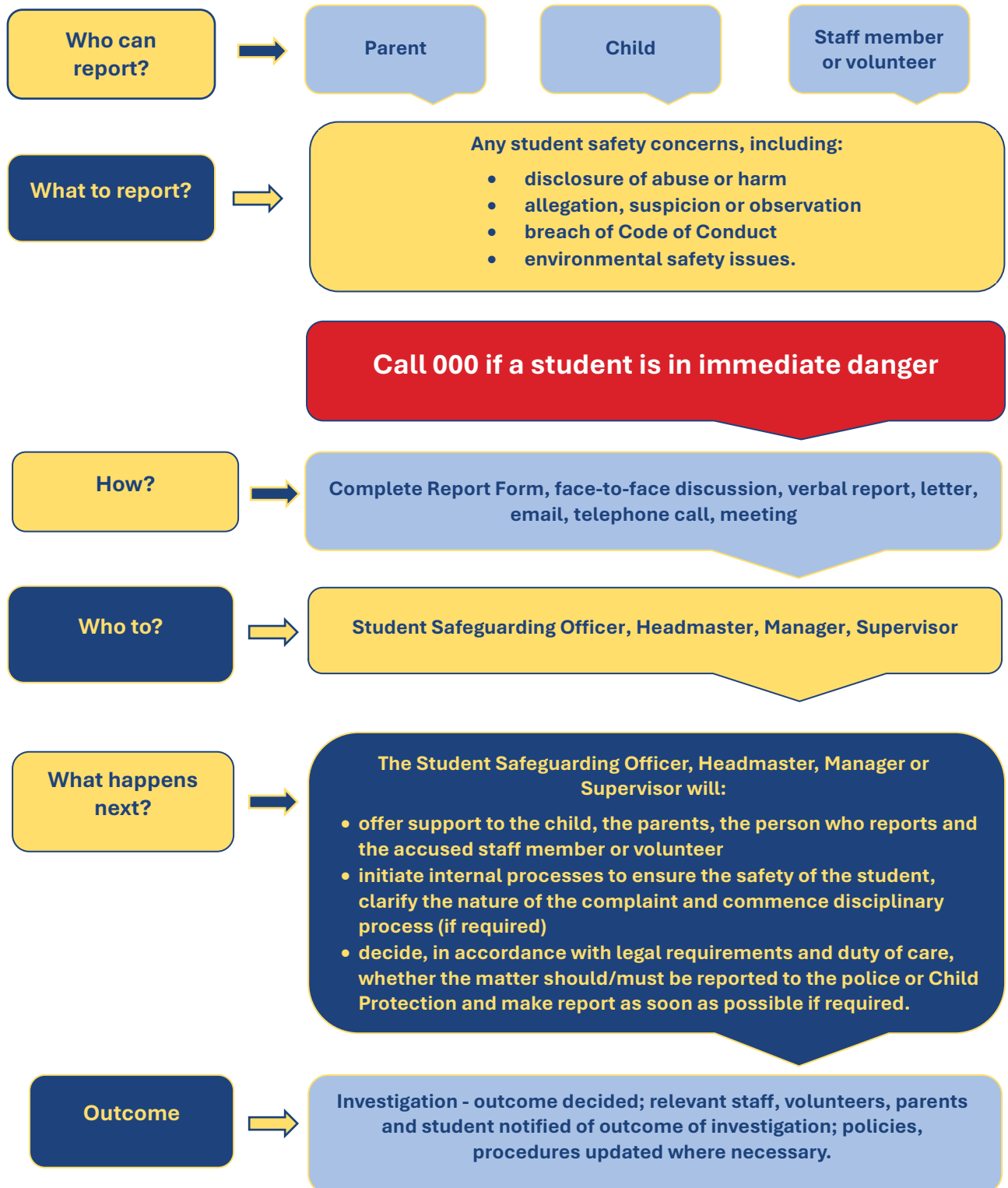




STUDENT SAFETY REPORTING PROCESS

Note: Reporting an incident, disclosure or suspicion of child abuse internally does not release you from other legal and regulatory obligations you may have

- Adapted from "A Guide for Creating a Child Safe Organisation" <http://www.ccyp.vic.gov.au/>





Appendix A – Managing Student Safety Reports in a Compliant and Consistent Manner

	Actions	Responsibility	Steps
A	Responding to an emergency on School campuses or in School activities where a student has just been abused or is at immediate risk of harm	<ul style="list-style-type: none"> Any person at the scene 	<ol style="list-style-type: none"> 1. Separate the alleged victim(s) and other(s) involved if safe to do so. 2. Administer first aid if required and qualified to do so. 3. Call 000 4. Preserve any item that may amount to evidence of the abuse (scene of the incident, clothing and other physical items). 5. Take reasonable precautions to prevent discussion of the incident between those involved in the alleged incident (including any other children who may have witnessed the incident). 6. If the incident is taking place in an online environment, disengage online and immediately call 000.
B	Responding to an incident, disclosure or suspicion of child abuse	<ul style="list-style-type: none"> Any member of the School community over 18 years 	<ol style="list-style-type: none"> 1. You must act in accordance with this Procedure if you form a suspicion or reasonable belief, even if you are unsure and have not directly observed the child abuse (e.g. if the victim or another person tells you about the abuse)
C	Mandatory reporting to authorities by designated professionals where through the course of their profession or employment a reasonable belief is formed that a child is at significant risk of harm and in need of protection from physical injury or sexual abuse.	<ul style="list-style-type: none"> Designated professionals under the Children Youth and Families Act 2005. The following are mandatory reporters in Victoria: <ul style="list-style-type: none"> o registered medical practitioners o nurses o Midwives o registered teachers and early childhood teachers o early childhood workers o school counsellors o registered psychologists o people in religious ministry 	<ol style="list-style-type: none"> 1. Any designated mandatory reporter who, through the course of their profession or employment, forms a reasonable belief that a child may be at significant risk of harm and in need of protection from physical injury or sexual abuse has a legal obligation to report their belief to DFFH child protection. 2. Mandatory reporting obligations cannot be delegated and should another person be nominated by the School to report to DFFH, the mandatory reporter maintains an obligation to ensure this has occurred. The obligation to report remains with the designated professional and cannot be overruled by the School, even if more senior staff do not share the same reasonable belief as the designated professional. 3. A report must be made as soon as reasonably possible and any further incidents which reinforce this belief must also be reported.
D	Reporting to authorities where a reasonable belief	<ul style="list-style-type: none"> Any member of the School community over 18 years 	<ol style="list-style-type: none"> 1. <u>Staff members</u> who witness an incident, receive a disclosure or form a reasonable belief that a child has or is at risk of being





	is formed that a child is in need of protection		<p>abused, even if unsure or have not witnessed the child abuse directly, must report to a Student Safeguarding Officer or the Headmaster as soon as reasonably possibly</p> <ol style="list-style-type: none"> 2. <u>Students</u> who witness an incident, receive a disclosure or form a reasonable belief that a child has or is at risk of being abused, even if unsure and have not witnessed the child abuse directly, must report to a School staff member in the first instance. The staff member must report the matter to a Student Safeguarding Officer or the Headmaster. 3. On receipt of a report, the Safeguarding Officers must report the incident to the Senior Student Safeguarding Officer and to relevant authorities. 4. If the suspected abuse is alleged against a School staff member, volunteer, contractor or officeholder, then it must be reported to CCYP. 5. If the suspected abuse is of a sexual nature (including grooming), then it must be reported to Victorian Police. 6. If the suspected abuse comes from within the family or outside community, then the suspected abuse must be reported to DFFH Child Protection if a child is considered to be: <ol style="list-style-type: none"> a. In need of protection from child abuse; b. At risk of being harmed (or has been harmed) and the harm has had, or is likely to have, a serious impact on the child's safety, stability, or development.
E	Reporting to authorities where a reasonable belief is formed that a sexual offence has been committed by an adult against a child under 16	<ul style="list-style-type: none"> Any member of the School community over 18 years 	<ol style="list-style-type: none"> 1. <u>Staff members</u> who have a reasonable belief that a sexual offence has been committed by an adult against a child under 16 must report to a Student Safeguarding Officer or the Headmaster as soon as reasonably possibly. 2. <u>Students</u> who have a reasonable belief that a sexual offence has been committed by an adult against a child under 16 must report to a School staff member in the first instance. The staff member must immediately report to a Student Safeguarding Officer or the Headmaster 3. On receipt of a report, the Safeguarding Officers must commence the reporting process, including reporting to police. 4. An adult who has a reasonable belief that a sexual offence has been committed by an adult against a child under 16 must report this to Victoria Police in person or by telephone unless they have a reasonable excuse not to do so or an exemption applies 5. A reasonable excuse not to report to Victoria Police includes:



			<ol style="list-style-type: none"> a. a fear for the safety of the victim or another person (except the alleged perpetrator) as a result of the disclosure; or b. a reasonable belief that the information has already been disclosed to police (e.g. through a mandatory report made to DFFH). <p>6. Exemptions from reporting to Victoria Police are as follows:</p> <ol style="list-style-type: none"> a. if the victim is 16 years or older at the time of providing the information and has requested confidentiality (except where the victim has an intellectual disability); b. if the person comes into possession of the information when they were a child; c. if the information is privileged (e.g. client legal privilege, journalist privilege); d. if the information is a 'confidential communication'; e. if the information is in the public domain; f. if the person is a police officer acting in the course of his/her duty in respect of the victim of the alleged sexual offence; or if the victim of the alleged sexual offence turned 16 years before 27 October 2014. <p>7. A disclosure made in good faith does not constitute unprofessional conduct or breach of professional ethics and the person making the disclosure will not be subject to liability in respect of it.</p>
F	Contacting parents / guardians / carers	<ul style="list-style-type: none"> • Headmaster • Senior Student Safeguarding Officer 	<p>1. The Headmaster or their delegate must consult with DFFH Child Protection or Victoria Police to determine what information can be shared with parents/carers. They may advise:</p> <ol style="list-style-type: none"> a. not to contact the parents/carer (e.g. in circumstances where the parents are alleged to have engaged in the abuse, or the student is a mature minor and does not wish for their parent/carer to be contacted) b. to contact the parents/carers and provide agreed information (this must be done as soon as possible, preferably on the same day of the incident, disclosure or suspicion) c. how to communicate with all relevant parties with consideration for their safety.
G	Removing someone from the School community	<ul style="list-style-type: none"> • Headmaster 	<p>1. If there is a substantial risk that an adult within the School community may commit</p>



	who poses a substantial risk	<ul style="list-style-type: none"> • Director People & Culture 	<p>child abuse or a sexual offence against a child under 16, the School will take action to remove or reduce that risk.</p> <ol style="list-style-type: none"> 2. If a School employee poses a substantial risk then action may be taken in accordance with the School's Staff Code of Conduct and employment conditions. The Director, People and Culture shall ensure that any employment action taken by the School against an employee complies with existing employment laws, including relevant legislation, industrial agreements and employment contracts. 3. If a student poses a substantial risk then action may be taken in accordance with Student Discipline processes 4. Persons in positions of authority within the School who negligently fail to take reasonable action to protect a School from a known threat of abuse may face prosecution under 'Failure to Protect' laws.
H	Investigating allegations against a School staff member, volunteer, contractor or officeholder	<ul style="list-style-type: none"> • Headmaster • Senior Student Safeguarding Officer • People and Culture team 	<ol style="list-style-type: none"> 1. From 1 July 2017 allegations of child abuse against a School staff member, volunteer, contractor or officeholder are subject to the Victorian reportable conduct scheme. 2. When the details of an allegation of child abuse against a School staff member, volunteer, contractor or officeholder then it shall cause the allegation to be reported to the Headmaster (or the Board Chair if the allegation is against the Headmaster) as soon as possible. 3. The Headmaster or their delegate will report the allegation on behalf of the Headmaster to the Victorian Commission for Children and Young People ("Commission") and ensure appropriate investigation of the allegation as directed by the Commission, unless it is subject to police investigation. 4. Within 30 days of the initial report to the Commission, the Headmaster or their delegate will update the Commission with further details of the allegations and investigation. 5. At the conclusion of the investigation, any findings and reasons for the outcome of an investigation shall be reported to the Headmaster.
I	Providing on-going support	<ul style="list-style-type: none"> • Senior Student Safeguarding Officer • Wellbeing team 	<ol style="list-style-type: none"> 1. If a student is impacted by suspected abuse, and it is deemed appropriate in the circumstances, the Senior Student Safeguarding Officer shall: <ol style="list-style-type: none"> a. establish regular communication between staff and the child's parent/guardian/carer (if this is appropriate) to discuss a student's progress, wellbeing,



			<p>and the effectiveness of planned strategies</p> <ul style="list-style-type: none"> b. provide referral to Student Wellbeing team (if this is appropriate) where additional culturally or developmentally appropriate support may be required. c. convene a Student Support Group to plan on-going monitoring, support, and follow-up of the Student's health and wellbeing (Student Support Groups usually comprise wellbeing staff, teachers, allied health professionals and where appropriate the student and/or their parent/carer) d. develop and implement a Student Support Plan, which documents the planned support strategies and includes timeframes for review (where possible, these support strategies should be informed by allied health and wellbeing professionals with expertise in addressing child abuse and trauma)
J	Students logging a complaint or concern	<ul style="list-style-type: none"> • All students 	<ol style="list-style-type: none"> 1. At any point, a student may log a complaint and / or a concern



Office Use Only

Document Control / History	
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Supporting Documents	
<ul style="list-style-type: none"> Betrayal of Trust Report - Betrayal of Trust Child Safe Standards - CCYP The 11 Child Safe Standards SSS-001 Student Safety & Support Policy (overarching policy - in development) SSS-002 Student Safety Program Reference Guide SSS -003 Student Safety Definitions and Additional References SSS-004 Student Safety and Wellbeing SSS-005 Student Safety Code of Conduct SSS-006 Student Duty of Care SSS-007 Student Safety and Risk Management Procedure SSS-008 Professional Boundaries Guidelines SSS-009 Responding to and Reporting Allegations of Abuse 	<ul style="list-style-type: none"> SSS-010 Our Student Safeguarding Officers SSS-011 Student Safety Report form – Incident, Disclosure, Suspicion SSS-012 Student Safety Report form – Student Sexual Offending SSS-013 Student Safety Report Form – Early Childhood SSS-014 Student Version – Student Safety & Wellbeing SSS-025 Restraint Guidelines SSS-026 Discipline Policy IDG-003 Privacy Policy ICT-XXX ICT Acceptable Use

Student Lifecycle / Pillars / Values / IDEALS / IB PYP Attributes					
Student Lifecycle	Student Lifecycle Subsection	Pillars	Values	IDEALS	IB PYP Attributes
<ul style="list-style-type: none"> Student Recruitment Delivery of Education Programs Graduation & Community 	<ul style="list-style-type: none"> Marketing & Advertising Enrolments & Offers Finance Teaching & Learning Assessment Experiences Careers / Work Experience Graduation Old Grammarians / Alumni 	<ul style="list-style-type: none"> Governance & Leadership Legislative & Regulatory Compliance Complaints & Compliments People & Culture Finance Community Engagement / Foundation Property & Maintenance 	<ul style="list-style-type: none"> Integrity Aspiration Courage Compassion Responsibility Hope 	<ul style="list-style-type: none"> Internationalism Democracy Environmentalism Adventure Leadership Service 	<ul style="list-style-type: none"> Inquirers Knowledgeable Thinkers Communicators Principled Open Minded Caring Risk Takers Balanced Reflective

Legislative Context
<ul style="list-style-type: none"> Betrayal of Trust Report - Betrayal of Trust Child Safe Standards CCYP The 11 Child Safe Standards Children Youth & Families Act 2005 (Vic) Children, Youth and Families Act 2005 legislation.vic.gov.au Child Wellbeing & Safety Act 2005 (Vic) Child Wellbeing and Safety Act 2005 legislation.vic.gov.au Crimes Act 1958 (Vic) Crimes Act 1958 legislation.vic.gov.au Education & Training Reform Act 2006 (Vic) Education and Training Reform Act 2006 legislation.vic.gov.au Education & Training Reform Regulations 2017 (Vic) Education and Training Reform Regulations 2017 legislation.vic.gov.au Education Services for Overseas Students (ESOS) Act 2000 Federal Register of Legislation - Education Services for Overseas Students Act 2000 Education & Care Service National Law Act 2010 Education and Care Services National Law Act 2010 legislation.vic.gov.au Family Violence Protection Act 2008 Family Violence Protection Act 2008 legislation.vic.gov.au Ministerial Order 1359 ministerial-order-1359-975 National Code of Practice for Providers of Education & Training to Overseas Students 2018 (National Code 2018) Federal Register of Legislation - National Code of Practice for Providers of Education and Training to Overseas Students 2018 National Quality Standard (NQS) National Quality Standard ACECQA Notifiable Data Breaches Scheme About the Notifiable Data Breaches scheme OAIC Privacy Act 1988 (Cth) Federal Register of Legislation - Privacy Act 1988 Worker Screening Act 2020 Worker Screening Act 2020 legislation.vic.gov.au





Regulatory Context				
VRQA	CRICOS / National Code / ESOS Act	ACECQA / Department of Education	International Baccalaureate	Other
<ul style="list-style-type: none"> Education & Training Reform Act 2006 (Vic) – Section 4.3.1 Education & Training Reform Regulations 2017 (Vic) – Part 2A VRQA Guidelines to the Minimum Standards for School Registration Victorian Child Safe Standards – Standards 7, 8, 9 Ministerial Order No: 1359 – Clauses 11, 12, 13 Child, Youth & Families Act 2005 (Vic) Worker Screening Act 2020 (Vic) 	<ul style="list-style-type: none"> Education Services for Overseas Students (ESOS) Act 2000 – Section 19(2) National Code of Practice for Providers of Education & Training to Overseas Students 2018 (National Code 2018) – Standards 5 	<ul style="list-style-type: none"> National Quality Framework (NQF) Education & Care Service National Law Act 2010 Education & Care Services National Regulations 2011 National Quality Standard (NQS) – Quality Area 2 	<ul style="list-style-type: none"> International Baccalaureate Programme Standards – Standard A 	<ul style="list-style-type: none"> Child Wellbeing & Safety Act 2005 (Vic) Crimes Act 1958 (Vic) – Section 49M Privacy Act 1988 (Cth) Notifiable Data Breaches Scheme Family Violence Protection Act 2008 (Vic)