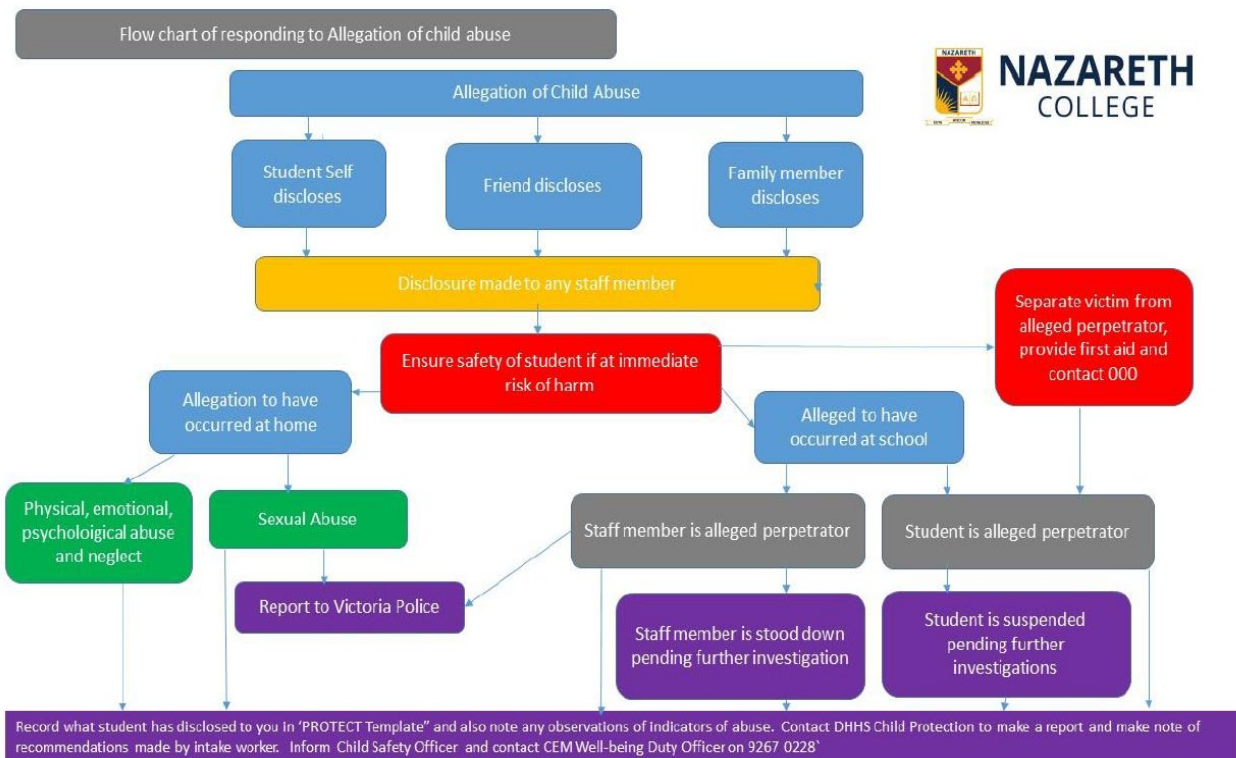


Nazareth College Processes for Mandatory Reporting

Mandatory reporting is a legal requirement under the Children, Youth and Families Act 2005 (Vic.) (Act) to protect children from harm relating to physical injury and sexual abuse. A child, for the purpose of the relevant parts of the Act, is any person 17 years of age or younger. School personnel mandated under this Act who, in the course of carrying out their duties, form a reasonable belief that a child is in need of protection from physical, emotional, psychological, developmental harm or sexual abuse, and that the child's parents are unwilling or unable to protect the child, must report that belief to Department of Families, Fairness and Housing (DFFH) Child Protection and the grounds for it as soon as possible after forming the belief. A subsequent report must be made on each occasion on which the mandated reporter becomes aware of further reasonable grounds for the belief.



PROCEDURES

Nazareth College has a moral, legal and mission driven responsibility to create nurturing school environments where children and young people are respected, their voices heard and where they are safe and feel safe.

Every person involved in Nazareth College has a responsibility to understand the important and specific role they have individually and collectively to ensure that the wellbeing and safety of all children and young people is at the forefront of all they do and every decision they make.

It is policy that all schools display the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse diagram in staff rooms and other strategic areas of the school, to ensure all school staff are aware of the actions to take as soon as they witness a child

protection incident, receive a disclosure or form a reasonable belief that a child has been, or is at risk of being, abused

Responding To And Reporting Child Protection Concerns

The approach to responding and reporting child protection concerns in the joint protocol incorporates the Four Critical Actions for Schools. Refer: Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse.

Before the Four Critical Actions can be followed a school, staff member must first be made aware of a child protection incident that will determine if they must take action to protect a child.

BECOMING AWARE OF A CHILD PROTECTION INCIDENT

There are four main ways in which a school staff member may become aware that a child is experiencing, or is at risk of experiencing, abuse:

1. **Witnessing an incident** - If you witness an incident where you believe a child has been subjected to abuse you must first take immediate action to protect the safety of the child or children involved and then go straight to the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse
2. **Forming a suspicion** - 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 your suspicion develops into a reasonable belief you must act and refer to the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse
3. **Receiving a disclosure about or from a current student** - All disclosures must be treated seriously. You should immediately refer to the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse
4. **Receiving a disclosure about or from a former student** - If the former student is currently of school age and attending a Victorian school, you must immediately refer to the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse. If the former student is no longer of school age or attending a Victorian school, you must still report the disclosure to Department of Families, Fairness and Housing (DFFH) Child Protection

NOTES AND RECORDS

Staff members are to keep clear and comprehensive notes relating to incidents, disclosures and allegations of child abuse using the Responding to Suspected Child Abuse: A Template for all Victorian Schools. For strategies on how to manage a disclosure refer to Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools –

THE FOUR CRITICAL ACTIONS

There are Four Critical Actions which must be taken when responding to and reporting a child protection incident, disclosure or suspicion: Responding to an Emergency; Reporting to Authorities; Contacting Parents/Carers; Providing Ongoing Support.

Critical Action 1 - Responding to an Emergency

This first step is only applicable if a child has just been abused or is at immediate risk of 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 immediate risk of harm you 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, that they are supervised separately by a member of staff;

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 protection incident has occurred at the school, school staff should also ensure that reasonable steps are taken to preserve the environment, the clothing and other items and prevent any potential witnesses from discussing the incident until the 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 to the appropriate authority. As soon as critical health and safety concerns have been addressed the staff member must take steps to report the child protection incident, suspicion or disclosure as soon as practicable

Department of Families, Fairness and Housing (DFFH) Child Protection is the Victorian government agency that protects children at risk of significant harm. All incidents, suspicions and disclosures of child abuse must be reported to Department of Families, Fairness and Housing (DFFH) Child Protection except where the incident involves sexual abuse or grooming, in which case it must be reported to the Police. Failure to report physical or sexual abuse of a child is a criminal offence. For more information, refer to the Failure to disclose section of this policy.

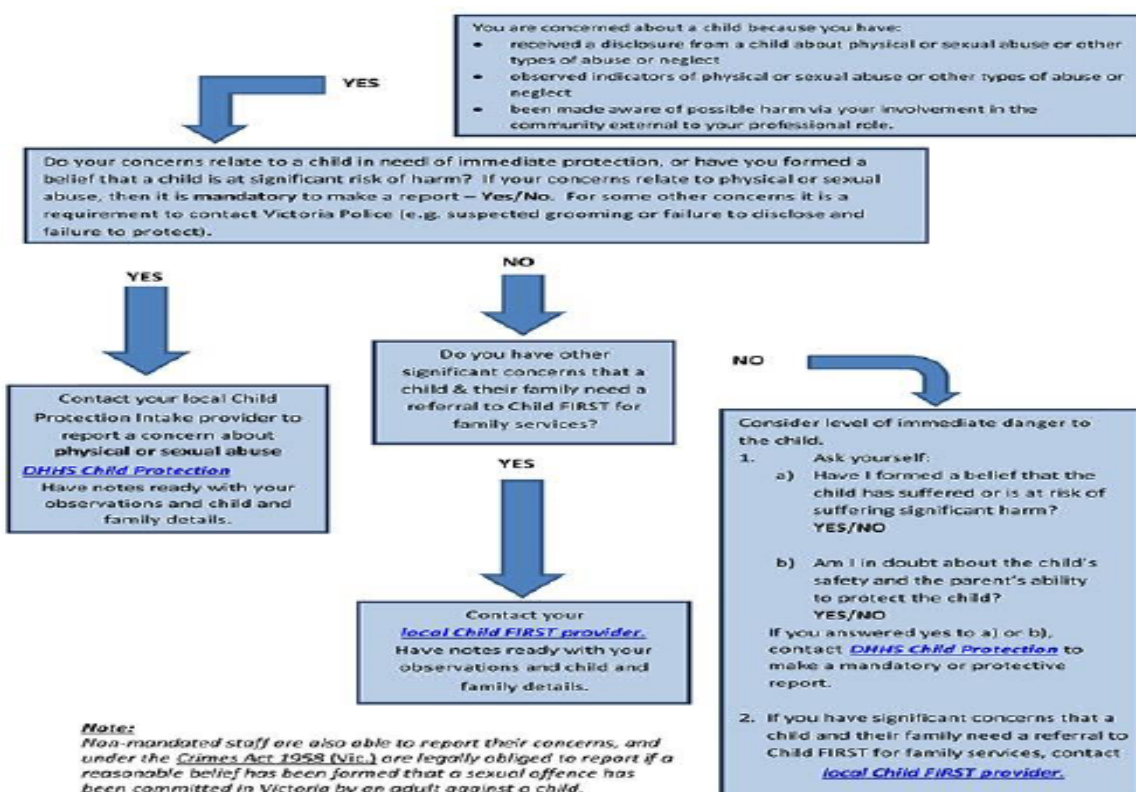
There are different reporting procedures and authorities who must be notified depending on whether the source of the suspected or alleged abuse came from within the school or within the family or community of the child. The DFFH and DET have deliberately set a low threshold for the formation of a 'reasonable belief'.

The Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse requires all school staff to report all incidents, suspicions and disclosures of abuse as soon as possible to the relevant authorities.

How to Make a Mandatory Report

The table 1.1 'When to make a mandatory report' describes the information to include when making a mandatory report about child abuse or child protection concerns. If a child is at immediate risk of harm, contact the Police immediately. The following tables set out when to report a concern that a child or a young person has been abused or is in need of protection.

1.1 Flowchart – Responding to a possible mandatory reporting concern



1.1 When to make a mandatory report

Type of Reporting	By Whom	To Whom
<p>Mandatory Reporting DFFH Child Protection Mandated reporters must make a report as soon as practicable if, in the course of practicing their profession or carrying out their duties, they form a belief on reasonable grounds that a child or young person is in need of protection, as a result of physical injury or sexual abuse, and the child's parents are unable or unwilling to protect the child.</p> <p>Physical injury that results from abuse or neglect. This refers to a situation in which a child receives an injury from a parent or caregiver which may be inflicted intentionally or be the inadvertent consequence of physical punishment or physically aggressive treatment of a child. Physical injury may also result from neglect from a parent or caregiver.</p> <p>Sexual abuse which occurs when an adult or someone bigger and/or older than the child uses power or authority to involve the child in sexual activity. Physical force is sometimes involved.</p>	<p>Pursuant to the Education and Training Reform Act 2006 (Vic.), Principals of government and non-government schools, registered medical practitioners, Nurses, psychologists, All members of the police force.</p>	<p>Contact DFFH Child Protection</p>

<p>Child in need of protection Any person may make a report if they believe on reasonable grounds that a child is in need of protection for any of the following reasons:</p> <ol style="list-style-type: none"> 1. The child has been abandoned and there is no other suitable person who is willing and able to care for the child. 2. The child's parents are dead or incapacitated and there is no other suitable person who is willing and able to care for the child. 3. The child has suffered or is likely to suffer significant harm as a result of physical injury and the parents are unable or unwilling to protect the child. 4. The child has suffered or is likely to suffer significant harm as a result of sexual abuse and their parents are unable or unwilling to protect the child. 5. The child has suffered or is likely to suffer emotional or psychological harm and the parents are unable or unwilling to protect the child. 6. The child's physical development or health has been or is likely to be significantly harmed and the parents are unable or unwilling to provide basic care, or effective medical or other remedial care. 	Any person	Contact DFFH Child Protection and Victoria Police if it is clear a crime has been committed.
<p>Child in need of therapeutic treatment Any person may make a report if they believe on reasonable grounds that a child who is 10 years of age or over, but under 15 years of age, is in need of therapeutic treatment because he or she has exhibited sexually-abusive behaviours. Contact Child FIRST if there is no significant concern about the immediate safety of the child.</p>	Any person	Contact DFFH Child Protection or Child FIRST
<p>Significant concerns about wellbeing of a child School staff can seek advice from or make referral to DFFH Child Protection or Child FIRST if they have a significant concern for the wellbeing of a child and where the immediate safety of the child is not compromised. The staff member should share relevant information with Child FIRST to help them complete their assessment of the referral.</p>	Any person	Contact DFFH Child Protection or Child FIRST

1.3 When to report criminal offences

Types of Reporting	By Whom	To Whom
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<p>Reasonable belief that a sexual offence has been committed by an adult against a child under 16. Any adult who forms a reasonable belief that a sexual offence has been committed in Victoria by an adult against a child under 16 must report that information to police.</p> <p>You will not be guilty of an offence if you do not report in the following circumstances:</p> <ol style="list-style-type: none"> 1. The victim is 16 years of age or older and does not have an intellectual disability that limits his/her capacity to make an informed decision; and he/she does not want the information reported to the police; 2. The victim has disclosed the information in confidence in the course of a therapeutic relationship with you as a registered medical practitioner or counsellor; 3. The victim turned 16 years of age before 27 October 2014; 4. Reasonable excuses for failing to comply with the requirement include: <ul style="list-style-type: none"> • a reasonable belief that the information has already been reported to police or DFFH Child Protection disclosing all of the information; • a reasonable fear that the disclosure will place someone (other than the alleged perpetrator) at risk of harm. 	Any person aged 18 or over	Victoria Police
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2. How to make a report for mandatory reporting and criminal Offences Making a report

In case of emergency or if a child is in life-threatening danger contact Triple Zero (000) or the local police station. Alternatively, to report concerns about the immediate safety of a child within their family unit to DFFH Child Protection, call the local Child Protection. If after hours call the Child Protection Crisis Line on 13 12 78.

The table below describes the procedures for Nazareth College staff when making a mandatory report about child abuse or child protection concerns. The following information also provides practical guidance in relation to record-keeping for both mandatory reporting and criminal offences.

Table 1.4 Making a Mandatory report

Step	Description
1 Keep Notes	<p>Individual staff members will make any observations and keep dated notes of the concerns that exist that have led them to form the belief that a report may be necessary. It may assist staff to think in terms of reporting behaviour or a series of behaviours and concerns. Notes should include:</p> <ul style="list-style-type: none"> • A description of the concerns (e.g., physical injuries, behaviours); • The source of the concerns (e.g., observation, report from child or another parent); <p>The actions taken as a result of the concerns (e.g., consultation with the Principal, Child Safety Officers, report to DFFH, Police).</p>

<p>2. Discuss Concerns</p>	<p>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 confidentially with the principal, the child safety officers or MACS Student Wellbeing Information Line. Those people in the positions of child safety officers at Nazareth College are: the Deputy Principal, director of wellbeing and School Counsellor.</p> <p>This is not a legal requirement, however, will help to ensure support is provided to all involved in matters of this nature. The confidentiality of these discussions must be maintained.</p> <p>You should then make your own assessment about whether you are required to make a report about the child or young person and to whom the report should be made.</p> <p>It is important to remember that the duty to report abuse or suspicions of abuse exists even if the principal, child safety officer or a representative of MACS advise you not to proceed with reporting suspected abuse.</p>
<p>3. Gather & Document Information</p>	<p>Gather the relevant information necessary to make the report. This should include the following information:</p> <ul style="list-style-type: none"> • Full name, date of birth and residential address of the child; • The descriptions of the concerns and the reasons for those concerns • The source of those concerns – e.g. observation, report from the child or another person); • The individual staff members' involvement with the child; • Details of any other agencies which may be involved with the child; • Actions taken as a result of the concerns (e.g. consultation with Deputy Principal, report to DFFH). <p>This information should be collected and documented using the Responding to Suspected Child Abuse: A Template for all Victorian Schools. The template is to be used to record as much information as possible when you make your report to either the Police or DFFH Child Protection. It is critical that completing the template does not impact on reporting times. If a child is in immediate danger school staff need to report the matter immediately to the Police.</p>
<p>4. Make the report</p>	<p>To report concerns which are life threatening phone 000 or the local police station.</p> <p>Where the source of the abuse comes from within the school; that is, the suspected or alleged abuse involves a staff member, volunteer or contractor at the school: Contact the Police. The Police will in this case, contact DFFH Child Protection when appropriate. You must also report internally to:</p>

	<ul style="list-style-type: none"> • The Principal, (if the Principal is involved in the allegations, contact MACS); • The Child Safety Officers; • MACS Student Wellbeing Information Line (92670228). <p>Where the source of the suspected or alleged abuse comes from within the child's family or community, you must:</p> <ul style="list-style-type: none"> • report sexual abuse and grooming to the Police; • Report the matter to DFFS Child Protection if you consider the child to need protection due to child abuse, or has been, is being or is at risk of being harmed due to any form of abuse. If after hours call the Child Protection Crisis Line on 13 12 78; • Report internally to the Principal, Child Safety Officers and MACS Student Wellbeing Information Line (9267 0228). <p>Any staff member who makes a report to DFFH and/or Victoria Police will be supported by a member of College Leadership or a Child Safety Officer.</p> <p>Finally gather the relevant information necessary to make the report. This should include the following information:</p> <ul style="list-style-type: none"> • The child's name, date of birth, age and address; • The reason for believing that the injury or behaviour is the result of abuse; • The assessment of immediate danger to the child or children (information may be requested about the whereabouts of the alleged abuser/s); • A description of the injury or behaviour observed; • The current whereabouts of the child; • Any other information about the family; • the individual staff member's involvement with the child or young person; • details of any other agencies which may be involved with the child or young person; • Relationship with the child of the person reporting. <p>As mandated reporters, you still must notify DFFH of the concerns even if all of the above information is not available. Failure to do this when you have reasonable grounds on which to form a belief is an offence and can incur a fine.</p>
<p>5. Document written records of report</p>	<p>Make a written record of the report including the following information:</p> <p>The information initially recorded in the Responding to Suspected Child Abuse: A Template for all Victorian Schools and any additional information provided to either the Police or DFFH Child Protection is to be stored securely and maintained for a minimum of seven (7) years by the school, to ensure that records are accessible upon request by external authorities investigating the matter.</p> <p>It should be decided who else in the school, if anyone, should be informed. The need for confidentiality should always be remembered in the interests of the student and the family. Only where the wellbeing of the student will be affected will the matter be discussed on a 'need to know' basis. All correspondence will come directly from the Deputy Principal</p>

6. Additional Steps	<p>In the case of International students, the Deputy Principal must notify the International Education Division of the Department of Education and Training on (03) 9637 2990 to ensure that appropriate support is arranged for the student.</p> <p>Additionally, where a child protection 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 VRQA.</p> <p>In the case of Aboriginal or Torres Strait Islander students, the Deputy Principal must notify MACS or Regional Office to ensure that the Aboriginal and Torres Strait Islander Education Team arrange appropriate support for the student.</p>
7. Notes	<ul style="list-style-type: none"> • The Child Safety Officers will support the reporting staff members and student that is the cause for concern. Appropriate support may consist of internal and external support structures. • All Nazareth College staff will be required to annually complete the 'Protecting the Safety of Children and Young People' mandatory reporting Professional Learning module (for Catholic/Independent Schools). It is the responsibility of the Principal to ensure that there is appropriate time allocated to complete this module http://www.elearn.com.au/deecd/mandatoryreporting/ • Additionally, staff will receive a Child Protection Briefing every year.

CHILDFIRST/ORANGE DOOR

If you believe that a child is not subject to abuse, but you still hold significant concerns for their wellbeing, you must still act. This may include making a referral to or seeking advice from ChildFIRST/Orange Door.

ChildFIRST/Orange Door is the Family Information Referral Support Team run by a registered community service in a local area that can receive confidential referrals about a child of concern. It does not have any statutory powers to protect a child but can refer matters to family services.

You should make a report to ChildFIRST/Orange Door if:

- You have a significant concern for a child's wellbeing;
- Your concerns are about circumstances that have a low-to-moderate impact on the child;
- The child's immediate safety is not compromised;
- You and the school have discussed the referral to child first/orange door with the child's parents/carers, and all parties are supportive of this decision.

WHERE YOU BELIEVE THAT THE CHILD'S PARENTS/CARERS WILL NOT BE SUPPORTIVE OF THE REFERRAL, YOU MAY REFER THE MATTER TO DFFH CHILD PROTECTION.

If you are unsure of what action to take in response to your concerns about a child, speak to the College's Child Safety Officers or a member of the school's Leadership Team, or contact DFFH Child Protection or ChildFIRST/Orange Door for further advice. For additional information refer to Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools.

MAKING ADDITIONAL REPORTS

After you have made a report, you may 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 belief has been formed – on reasonable grounds – that a child is likely to be at risk and in need of protection.

If there is any suspicion that this relates to a sexual offence involving a person over 18 and a child under 16 then it must be reported to the Police.

Where a staff member is aware that another 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 first staff member need not make a further report. However, if the first staff member has formed a reasonable belief of abuse or a 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

Critical Action 3 - Contacting Parents/Carers

Where it is suspected that a child at the school has been, or is at risk of being abused, it is critical that parents/carers of the child are notified as soon as practicable after a report is made to the authorities. However, the school must always seek advice from the Police/DFFH Child Protection, to ensure that it is appropriate to contact the parents/carers:

- Advice from the Police or DFFH Child Protection will depend on a number of factors, including - whether the parents/carers of the child are alleged to have engaged in the abuse;
- Whether a disclosure to the parents/carers may result in further abuse to the child;
- Where the child is a mature minor (at least 17 years of age and assessed to be sufficiently mature and intelligent to make decisions for themselves) and has requested that their parents/carers not be notified – the school should insist that another responsible adult is notified in lieu of the parents/carers;
- Whether notifying parents/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/carers should also be notified promptly after the school has carefully considered the factors listed above. For detailed guidance on how to have this conversation with a parent or carer, refer to Protect: Identifying and Responding to All Forms of Abuse in Victorian Schools.

Critical Action 4 - Providing Ongoing Support

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

Support provided to students at the school includes:

- Regular communication with the student and their parents/carers where appropriate;
- Convening a student support group of school wellbeing staff and teachers to plan, support and monitor affected students;
- The development of student support plans for students impacted by the incident to ensure appropriate levels of care and support are provided depending on their involvement;
- The school will also contact MACS Student Wellbeing Information Line (9267 0228) for a description of the range of school-based support services that may be available.

Where 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 on this topic, refer to [School Guidelines 2.19a: Police and DFFH Interview Protocols](#)

The school has a duty to ensure that school staff members are supported following the witnessing of an incident or disclosure, or who have made a report to external authorities about a reasonable belief of child abuse. Staff members requiring wellbeing support can contact the school's Employee Assistance Program (EAP) provider on 1800 818 728 or accesseap.com.au. The school will conduct a review of the reporting process 4–6 weeks after a report has been made to identify if any follow-up support actions are needed.

THIS TABLE DESCRIBES THE POTENTIAL CONSEQUENCES OF MAKING A REPORT.

3.2 Potential consequences of making a report

Potential consequence	Description
Confidentiality	<p>The identity of a reporter must remain confidential unless:</p> <ul style="list-style-type: none"> • The reporter chooses to inform the child, young person or parent of the report; • The reporter consents in writing to their identity being disclosed; • A court or tribunal decides that it 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.
Professional Protection	<p>If a report is made in good faith:</p> <ul style="list-style-type: none"> • 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	<p>DFFH Child Protection and/or Victoria Police may conduct interviews of children and young people at the school without their parent's knowledge or consent:</p> <ul style="list-style-type: none"> • Interviewing children and young people at school should only occur in exceptional circumstances and if it is in the best interests of the child to proceed in this manner; • DFFH Child Protection and/or Victoria Police will notify the Principal or a member of the Leadership Team of their intention to interview the child or young person on the school premises; • When DFFH Child Protection/Victoria Police officers come to the school premises, the Principal or a member of the Leadership Team should request to see identification before permitting them to have access to the child or young person; • When a child or young person is being interviewed by DFFH Child Protection and/or Victoria Police, school staff must arrange to have a supportive adult present with the child or young person. <p>For more information on these requests and school responsibilities, see MACS Guidelines 2.19a: Police and DFFH Interview Protocols.</p>

Support for the child or young person	<p>The roles and responsibilities of staff members in supporting children who are involved with DFFH Child Protection may include the following:</p> <p>Acting as a support person for the child or young person attending DFFH Child Protection case planning meetings;</p> <p>Observing and monitoring the child's behaviour liaising with professionals;</p> <ul style="list-style-type: none"> • Observing and monitoring the child's behaviour; • Liaising with professionals.
Requests for Information	<p>DFFH Child Protection and/or Child FIRST 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.</p> <p>In certain circumstances, DFFH Child Protection can also direct school staff and Department staff to provide information or documents about the protection or development of the child. Such directions should be in writing and only be made by authorised persons within DFFH Child Protection:</p>
Witness Summons	<p>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.</p>

RESPONDING TO COMPLAINTS OR CONCERNS

The school may receive concerns or complaints about school staff management of a child protection incident. These concerns or complaints may be voiced by parents/guardians or others within the school Community. The school should follow its internal complaints handling process to ensure that all concerns, complaints or feedback on school policies or processes are effectively captured and appropriately managed.

It is important that, as a first step, the school ensures that the complaint does not raise concerns that child abuse or a risk of child abuse has gone unreported.

If this is the case, the school should follow the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse to ensure that any new information received through a complaint or concern from a member of the school community is reported to authorities where required

GUIDING PRINCIPLES

Any current or past student from Nazareth College has the right to make a complaint about any aspect of their school experience. Complainants who raise allegations of a criminal Act will be advised of their right to make a formal complaint to the Police. All complaints will be taken seriously and will be addressed and responded to as soon as possible.

In circumstances in which students at Nazareth College have suffered abuse whilst at the school, the school accepts in full the responsibility to support and assist that person, whether it is a current, or former, student.

When Nazareth College believes that a complaint should be upheld, the response from the school will include some form of reparations.

Reparations may include, but will not be limited to:

- Acknowledgement of any failures in the Nazareth College duty of care;
- Provision of a formal apology in a format and manner agreed with the complainant;
- Assistance with access to counselling or other support services;

- Remedial actions to prevent the reoccurrence of any similar acts of sexual abuse against Nazareth College students.
- A financial payment reparation may only be offered to the claimant, victim or victims with the recommendation of the Principal, together with the Nazareth College Advisory Committee and approval of the Canonical Administrators.

THE PROCESS WILL:

- Be based on principles of procedural fairness for all parties;
- Treat complainants respectfully, supportively and professionally;
- Be as open and transparent as possible, whilst respecting people's rights to privacy and confidentiality;
- Take a humane view, rather than a legalistic approach;
- Reflect a commitment to address past grievances and provide a pathway towards recovery and healing;
- Endeavour to ensure staff maintain confidentiality and appropriate record keeping;
- Consider the complainant's expressed wishes, gender, culture, language and accessibility, throughout the process;
- Respect the rights of the alleged perpetrator with regard to untested allegations;
- The College will always release its student file to a complainant, subject to 'blanking out'/removing material that would identify others (breach the privacy rights of other persons);
- Use de-identified information where it is possible to do so, in the course of the investigation;
- Where a crime appears to have been committed, the complainant will be encouraged to report it to the Police;
- The school will always act in a way consistent with its legal and ethical obligations;
- The authorities will always be advised, where that is mandated under law, or in circumstances where the school views that as appropriate to prevent further harm (e.g. where the perpetrator is still teaching at the school or elsewhere). To this extent, the school may not be able to provide an undertaking as to confidentiality to either the complainant or the alleged perpetrator.

The College will investigate all complaints in relation to sexual abuse that may have occurred to students in its care:

- A complaint is a registration of dissatisfaction with the school, lodged verbally or in writing by a complainant or their representative. A complaint may be related to a specific episode, occurrence of failure in provision of service that has resulted in an impact on an individual or group. A general expression of concern is not a complaint;
- A complaint may be made by a person who was the victim of the alleged conduct, or their representative. Where the complainant is not the victim, they will need to demonstrate that they have the authorisation of the victim to make the complaint;
- A complaint may relate to the conduct of a current or past employee, contractor, volunteer or student;
- When received initially by reception or staff, the complainant should be referred to the Principal;
- The Principal will explain and refer the complainant to the Nazareth College Child Protection Reporting Policy and will encourage the complainant to outline their complaint in writing, if not already done so;
- In accordance with privacy legislation, Nazareth College will provide the complainant with full access to and copies of any information and records that contain information about their time at Nazareth College;
- The Principal will offer the support of the School Counsellor. The Canonical Administrators will be informed about the alleged abuse. The Principal will advise other relevant authorities, e.g. the Chair of the Board, MACS, Police in accordance with Ministerial Order No 870;

- Should the complainant decide that they do not wish to proceed with the complaint, the Principal will offer appropriate support persons or organisations;
- Nazareth College may seek to proceed with an investigation after a complaint has been withdrawn where it deems it appropriate to do so, especially when it holds concerns for the welfare of any current or former students. Nazareth College will comply with all recommendations of Ministerial Order No 870.

INVESTIGATIONS

When the School is made aware of specific allegations/rumours/hearsay, then it will record the specific details in writing, in so far as they can be ascertained, and it will act in accordance with Ministerial Order No 870.

It will investigate these matters:

- If formalised as a complaint;
- If a current student is alleged to have been abused.

Nazareth College may investigate them if it believes this to be appropriate and, in making this decision, will have regard to factors such as:

- The particular circumstances involved;
- Whether corroborative evidence exists (e.g. similar allegations against an alleged perpetrator);
- Whether there is a reasonable belief that further harm could be done (e.g. the alleged perpetrator is still teaching at the school or elsewhere);
- The potential impact on the alleged victim.

Incidents involving a current student

The College would follow the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse and would involve the Child Safety Officers in the initial investigation.

Incidents involving a past student

- Any allegations or complaints made by a past student or his or her representatives are to be referred to the Principal (or delegate) who will make the initial contacts and notes;
- The Canonical Administrators and MACS shall be informed as soon as possible;
- The welfare of the past student is paramount. Immediate access to counselling services is to be offered, as appropriate;
- The College will, as far as possible, seek to adopt an investigative process sympathetic to the complainant and appropriate to the circumstances;
- The Principal will convene a meeting with relevant senior staff to plan an investigation and record all relevant dates, details, names and locations. They may choose to use an outside agency such as MACS at this point to ensure a balanced and professional investigation process. Insurers will be informed and may become involved when/if formal legal claims are made;
- All evidence will be given to the Canonical Administrators who will discuss the outcome of the investigation and decide on further action;
- All decisions will be explained and relayed personally to the complainant at the end of the investigative process;
- Should there be grounds for criminal investigation, the complainant will be strongly urged to refer the matter to the Police, or, in matters of mandatory reporting, Nazareth College will report the matter itself. If this is the case, the school should follow the Four Critical Actions for Schools: Responding to Incidents, Disclosures and Suspicions of Child Abuse to ensure that any new information received through a complaint or concern from a member of the school Community is reported to authorities where required.

Incidents involving a current staff member

- Any allegations or complaints made about a current staff member are to be referred to the Principal who will make the initial contacts and notes;
- The Principal shall be informed as soon as possible, and they will inform the Canonical Administrators;
- The School will, as far as possible, seek to adopt an investigative process sympathetic to the complainant and appropriate to the circumstances;
- The staff member will be informed of allegations against them and be asked to take leave with pay while the matter is investigated;
- The Principal will convene a meeting with relevant staff to plan an investigation and record all relevant dates, details, names and locations. MACS will be advised and invited to oversee the process to ensure a balanced and professional investigation. Insurers will be informed and may become involved when/if formal legal claims are made;
- All evidence will be given to the Canonical Administrators who will discuss the outcome of the investigation and decide on further action;
- All decisions will be explained and relayed personally to the complainant at the end of the investigative process;
- Should there be grounds for criminal investigation, the complainant will be strongly urged to refer the matter to the Police, or, in matters of mandatory reporting, Nazareth College will report the matter itself;
- If the matter is deemed to be reportable conduct, the Principal will follow the required steps in the school's reportable conduct policy.

REFERENCES

1. Catholic Education Commission of Victoria Ltd (CECV) 2018, Victorian Catholic Education Multi Enterprise Agreement 2018, CECV.
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2. Congregation for Catholic Education 1997, The Catholic School on the Threshold of the Third Millennium, Vatican, http://www.vatican.va/roman_curia/congregations/ccatheduc/documents/rc_con_ccatheduc_doc_27041998_school2000_en.html.
3. Department of Education, 2016, PROTECT: Identifying and responding to all forms of abuse in Victorian schools
4. State of Victoria 2016, Child Safe Standards – Managing the Risk of Child Abuse in Schools: Ministerial Order No. 870, Education & Training Reform Act 2006, Victorian Government Gazette No. S2. Parliament of Victoria, Family and Community Development Committee, 2013, Betrayal of Trust