

# Responding to and Reporting Child Safety Incidents or Concerns

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## 1. Statement of Commitment to Child Safety

The Geelong College is a Child Safe School. We have a zero-tolerance stance on child abuse and are committed to the protection of all children from all forms of abuse. The Geelong College recognises that in order to achieve a child safe environment at the College which meets students' intellectual, physical, social, emotional and moral needs, students need to be involved in the creation and maintenance of such an environment.

We are committed to taking a preventative and proactive approach to providing a child safe environment where children and young people are safe and feel safe; they are empowered to use their voices when decisions are being made that affect their safety. We are also committed to providing simple and accessible processes to assist all children to identify and communicate when they do not feel safe. Particularly, this includes those who are Aboriginal and Torres Strait Islander, from culturally diverse backgrounds and those with a disability.

We are clear about our behavioural expectations of every person in our community and are committed to having a shared understanding of and responsibility for child safety. All staff are expected to uphold a culture that protects children from all forms of harm.

### 1. Introduction

*The Geelong College is committed to the highest standards of child safety and protection. This document outlines the College's procedures for responding to and reporting child safety incidents or concerns, including compliance with the **Reportable Conduct Scheme (RCS)** under the **Child Wellbeing and Safety Act 2005 (Vic)**. It clarifies how the RCS obligations differ from other legal and policy-based child safety requirements.*

#### **a. Distinguishing the Reportable Conduct Scheme from Other Child Safety Obligations**

*While the Reportable Conduct Scheme applies specifically to **employee-related misconduct**, other child safety obligations apply in different contexts:*

##### **i. Mandatory Reporting to Child Protection:**

*Required when a child is believed to be at risk of significant harm due to physical or sexual abuse. Reports are made directly to the **Department of Families, Fairness and Housing (DFFH) Child Protection**.*

##### **ii. Duty to Protect (Failure to Protect Law):**

*School leaders may be criminally liable if they fail to remove or reduce a **known risk of sexual abuse** by an adult associated with the College.*

##### **iii. Failure to Disclose Law:**

*Any adult (including staff, volunteers, and community members) must report to the police when they have a **reasonable belief** that a child has been sexually abused.*

##### **iv. Reporting to Police:**

*Any allegations of criminal offenses (e.g., sexual abuse, physical assault) must be reported immediately to **Victoria Police** by calling **000**.*

##### **v. Reporting Teacher Misconduct:**

## **2. Scope**

This policy applies to:

- a.** Management or persons in control, persons in day-to-day charge, early childhood teachers, educators, staff, Day Students- Domestic and International Boarding, volunteers, approved providers/contractors, parents/guardians, children, and others attending the programs and activities of The Geelong College, including offsite excursions and activities.
- b.** Together referred to as "The Geelong College Community" for the purpose of the Responding to and Reporting Child Safety Incident Concerns Policy.
- c.** The Responding to and Reporting Child Safety Incident Concerns Policy applies in all The Geelong College and Boarding Houses (Mackie & Mossgiel) environments. The Geelong College and Boarding House environments include the following physical, virtual and online places used by a student or a boarding student at any time.

## **3. Policy Detail**

Concern for student wellbeing and the need for protection of students are among the most important for staff of The Geelong College.

This document outlines when and how Staff, Volunteers and Contractors (together referred to as "Staff" or "Staff members" for the purpose of this Policy) must report child safety incidents or concerns internally to The College.

Child safety incidents or concerns can take many forms, Unfortunately, the nature of child abuse and other harm is complex. Child abuse or other harm may occur over time and potential indicators of abuse are often difficult to detect. The perpetrator may be a parent, carer, other family member, staff member, Volunteer, Contractor, another adult or even another child. The legal obligations for reporting allegations of child abuse or other harm can vary depending on the circumstances of the child safety incident or concern.

All of The College's procedures for reporting and responding to child safety incidents or concerns are designed and implemented taking into account the diverse characteristics of The College community.

## **4. Purpose**

The Geelong College has clear procedures for responding to complaints or concerns relating to child abuse and the policies and procedures for responding to child abuse and other harm at The College align with the [Four Critical Actions](#). The (Four Critical Actions) requires that all Staff must report internally to The College any instances of suspected child abuse, regardless of whether the alleged perpetrator is a parent/carers, other family member, member of the community or A Geelong College staff member, Volunteer, Contractor or Visitor.

This document describes our work systems, practices and procedures for responding to and reporting all child safety incidents or concerns, including but not limited to incidents, concerns, complaints, allegations and disclosures of "child abuse" as defined in Ministerial Order 1359 and the Child Wellbeing & Safety Act 2005 (CWS).

## **5. Responding**

### **5.1 Managing your initial Response to a Child Safety Incident or Concern**

This section of the Child Protection Program aligns with Action One of the [Four Critical Actions](#) outlining the College's policies regarding, and the procedures that Staff, Volunteers and Contractor's (together referred to as "Staff" or "Staff members" for the purpose of this section of the Child Protection Program) should follow immediately after witnessing or being told about, a child safety incident or concern.

Ways that staff may become aware that a student may be experiencing abuse or other harm and strategies, guidelines and requirements for responding to situations and for assisting the students involved.

## 5.2 Responding to an Emergency

All Staff must act as soon as they witness a child safety incident or form a reasonable belief that a student has just been, or is at immediate risk of being, abused or harmed.

If a student has just been or is at immediate risk of being harmed, you must ensure their safety by:

- i. Separating alleged victims and others involved
- ii. Administering first aid
- iii. Calling 000 for urgent medical assistance or Police assistance to address immediate health and safety concerns
- iv. Notifying the Principal or the Chair of The Geelong College Council
- v. Briefing the Principal to be the future liaison with the Police on the matter

## 5.3 Preserving Evidence

When an incident of suspected child abuse or harm occurs at The College or at a College event, preserving as much evidence as possible is crucial.

Staff should take the following steps (provided it is safe to do so):

- i. Environment: do not clean up the area, and preserve the sites where the alleged incident occurred
- ii. Clothing: take steps to ensure that the person who has allegedly committed the abuse and the child who has allegedly been abused remain in their clothing. If this is not possible, ensure the clothes are not washed, handled as little as possible and stored in a sealed bag.
- iii. Other physical items: ensure that items such as weapons, bedding and condoms are untouched
- iv. Potential witnesses: reasonable precautions must be taken to prevent discussion of the incident between those involved in or witnesses of the alleged incident.

## 5.4 Documenting your observations and actions

The College requires all staff to use the [PROTECT Recording your actions: Responding to suspected child abuse - Template](#) to record all child safety incidents and concerns, including observations, beliefs, suspicions, disclosures and allegations of child abuse or other harm.

This template must be used regardless of whether the alleged perpetrator may be a parent/carer, other student, staff member, Volunteer, Contractor, or any other person.

It is critical that all Staff keep clear and comprehensive notes relating to any incident, disclosures and allegations of child abuse and other harm. This information may be sought at a later date if there are court proceedings. Your notes may also assist you later if you're required to provide evidence to support your decisions regarding the handling of child safety incidents.

For more information about how to record observations, disclosures or allegations refer to The College General Records Management Policy – Child Protection Record Keeping

## 5.5 Witnessing a Child Safety Incident

Staff who witness an incident where they believe that a student has been subject to abuse or harm must take immediate action to protect the safety of the student/s involved.

Where there is an immediate risk to the health and/or safety of a student, follow the steps outlined in Responding to an Emergency.

After the immediate health and safety of the student/s involved is ensured, follow any other relevant procedures for Responding to and Reporting Child Safety Incidents or Concerns.

## 5.6 Observing of Abuse and Other Harm Indicators

The different types of child abuse and their key indicators are set out in [Definitions and Key Indicators of Child Abuse and Other Harm](#). The process of identifying child abuse or other harm purely through observation of these indicators can be complex and may occur over time. The complexity is magnified by the fact that many of the key indicators described may also occur as a result of other factors, not related to child abuse or other harm.

Whether a staff member can be said to have “observed” an indicator of abuse or other harm can, in some cases, be subjective, and can depend on the staff member’s own skills, attributes and experiences.

Therefore, it is not possible for The College to require that all Staff respond in a particular way when they observe key indicators of child abuse and other harm.

If you observe indicators that raise a concern that a student may be experiencing abuse or other harm, you should:

- i. make written notes of your observations recording both dates and times
- ii. discuss the matter with a [Child Protection Officer](#) who can assist you in clarifying your concerns and managing the next steps.

## 5.7 Private Disclosure by a Student

### 5.7.1 During the Disclosure

If a current student discloses a situation of abuse or other harm to Staff privately, they should stay calm and not display expressions of panic or shock.

Staff should reassure and support the student. You can do this by:

- i. stating clearly that the abuse or other harm is not the student’s fault
- ii. reassuring the student that you believe them
- iii. telling the student that disclosing the matter is the right thing to do

You should be patient and allow the student to talk at their own pace. When responding you should use the student’s language and vocabulary.

Sometimes a student may try to elicit a promise from you that you will not tell anyone about the allegation. You must not make this promise, as you are responsible for reporting the matter.

It is not your role to investigate the allegation. You should not interrogate the student or pressure them to tell you more than they want to.

### 5.7.2 Responding to and Reporting the Disclosure

Following a disclosure of abuse or other harm by a student, Staff should follow the steps set out in Support Following Child Safety Incident or Disclosure.

When a disclosure is made to a staff member, they must:

report the matter internally to a [Child Protection Officer](#), the Principal (or to the Chair of The Geelong College Council if the child safety incident or concern involves the Principal) as soon as possible

- i. comply with any external reporting requirements
- ii. make written notes of the circumstances of the disclosure recording both dates and times.
- iii. follow the steps set out in Support Following a Child Safety Incident or Disclosure

## 5.8 Public Disclosure by a Student

Public disclosure occurs where a staff member observes a student disclosing abuse or other harm to another student or group of students.

In this circumstance you should use a strategy of “protective interrupting”.

The aim of “protective interrupting” is to prevent a student from disclosing details of abuse in front of other children, while at the same time providing the student with the opportunity to disclose later, in a safe and confidential manner.

You can do this by:

- i. asking the student if you can talk privately
  - ii. moving the student away from the other students to a quiet space
- and then following the guidelines with respect to Private Disclosure by a Student.

### 5.9 Third Party Disclosure

A third party may provide Staff with information relating to a child safety incident or concern involving a student, The Geelong College and/or a staff member.

#### 5.9.1 During the Third-Party Disclosure

When a third party makes a disclosure, you should:

- i. listen to the person’s concerns seeking clarification where required
- ii. thank the person for raising their concern
- iii. advise the person that we have procedures for dealing with situations like this
- iv. advise the person that you will discuss their concerns with the relevant authorities

As with Private Disclosure by a Student, you should reassure and support the person providing the information.

Sometimes a person may try to elicit a promise from you that you will not tell anyone about the allegation. You **must not** make this promise, as you are responsible for reporting the matter.

Remember that your role is not to investigate the allegation. You should not interrogate the third party and pressure them to tell you more than they want to.

#### 5.9.2 Responding to and Reporting the Third-Party Disclosure

When a third-party disclosure is made to a staff member, they must:

- i. report the matter internally to a [Child Protection Officer](#), the Principal (or to the Chair of The Geelong College Council if the child safety incident or concern involves the Principal) as soon as possible
  - ii. comply with any external reporting requirements
  - iii. make written notes of the circumstances of the disclosure recording both dates and times
- In some circumstances, such as when the disclosure relates to a child safety incident occurring at The College or a College event, or the conduct of a staff member, a third-party disclosure should be considered a child protection-related complaint and must be managed pursuant to our Child Protection Complaints Management policy.

### 5.10 Disclosure by a Former Student

A former student of The College may come forward to a current staff member and disclose past abuse or other harm from their time at The College.

#### 5.10.1 Responding to and Reporting the Disclosure

Disclosures of historical abuse or other harm by a former student should be considered a child protection-related complaint and must be managed pursuant to our Child Protection Complaints Management policy.

If you receive a disclosure from a former student about historical abuse or other harm that is alleged to have occurred at The College, you must also take any immediate actions that may be required, including but not limited to:

- a. If the former student is still a child, you must follow any and all relevant policies and procedures for responding to and reporting child safety incidents or concerns, specifically the obligations you may have under:
  - i. Duty to Protect/Failure to Protect
  - ii. Mandatory Reporting to Child Protection
  - iii. Non-Mandatory Reporting to Child Protection
  - iv. Reporting to Police
  - v. Reportable Conduct
  - vi. Reporting Teacher Misconduct to the Victorian Institute of Teaching
- b. If the former student is an adult, you must still act. For example, if the disclosure includes an allegation against a current staff member or teacher at The College this may trigger obligations under the Duty to Protect/Failure to Protect policy to remove the risk of abuse or harm to current students.

### 5.11 Support Following Child Safety Incident or Disclosure

Child safety incidents or concerns can cause trauma and significantly impact on the mental health and wellbeing of children. In addition to reporting and referral to the relevant authorities, The College plays a central role in addressing this trauma and has a duty of care to ensure that the students feel safe and supported at The College.

The College also has a duty of care to staff members who may witness a child safety incident or who receive a disclosure of child abuse and other harm.

#### 5.11.1 Support for the Student Immediately Following the Incident or Disclosure

Staff members should take the following steps to support and assist a student after a child safety incident or a disclosure of child abuse or other harm is made.

The range of measures employed will depend on:

- i. the degree of severity of the situation
- ii. the risk of harm to the student
- iii. the capability and willingness of the parent/carer to protect the student from harm

After a disclosure is made:

- i. do not promise the student that you will not tell anyone about the allegation
- ii. do not confront the person believed to be the perpetrator
- iii. reassure the student that telling an adult was the right thing to do
- iv. tell the student what you plan to do next
- v. discuss the matter with one of The Geelong College's [Child Protection Officer](#), who will assist you in developing additional support strategies for the student
- vi. whenever there are concerns that a student is in immediate danger the Police should be called on 000

#### 5.11.2 Ongoing Support for the Student and Family: Student Support Plan

If a student is impacted by a child safety incident or concern, [Child Protection Officer](#), will work with the student and their family to develop a Student Support Plan and engage external support services, using trauma-informed care principles.

Students and parents/carers are also able to contact one of The College's [Child Protection Officer](#), to access support.

#### Guidelines for Developing the Student Support Plan

Support strategies that could be considered for students and/or their families following disclosure might include offering or organising referrals to internal or external support, such as The College Psychologist, Counsellors, an external support agency and/or child advocacy organisation which specialises in supporting children and young people impacted by abuse or other harm.



When supporting a student with disability who has been impacted by a child safety incident or concern, The College considers:

- i. the chronological age, developmental age and cognitive function of the student in order to tailor developmentally appropriate support strategies
- ii. the student's vulnerability to ongoing abuse and other harm when considering the need to make a further report and/or implement further risk mitigation strategies

When supporting students from culturally diverse backgrounds, including Aboriginal or Torres Strait Islander students, The Geelong College provides culturally appropriate support. Where possible The College will work with relevant cultural support groups, ensure that the family's privacy is maintained, and engage an interpreter when communicating with the student's family.

Similarly, when supporting overseas students who have been impacted by a child safety incident or concern, The College will give consideration to appropriate measures to be taken for the welfare of the student, including additional support where appropriate given that the student's family may not be present to provide support within the home environment.

Students from refugee backgrounds who have been impacted by abuse may also be experiencing trauma, dislocation and loss. Sensitive consideration should be given when determining how to support the student and their family.

#### 5.11.3 Support for Former Students

Staff members should take the following steps to support and assist a former student after a disclosure of past abuse or other harm during their time at The College. The range of measures employed will depend on:

- i. the degree of severity of the situation
- ii. the risk of harm to current students
- iii. if the former student is still a child or young person, the capability and willingness of their parent/carer to support the former student

After a disclosure is made:

- i. do not promise the former student that you will not tell anyone about the allegation
- ii. do not confront the person believed to be the perpetrator
- iii. reassure the former student that it was the right thing to do to tell The College about the allegation
- iv. tell the former student what you plan to do next
- v. discuss the matter with one of The Geelong College's [Child Protection Officer](#), who can assist you in developing additional support strategies for the former student

Whenever there are concerns that there may be immediate danger the Police should be called on 000.

Additional support strategies that should be considered, in consultation with a [Child Protection Officer](#), for former students following disclosure might include offering or organising referrals to internal or external support, such as The Geelong College Psychologist, Counsellors, or an external support or advocacy organisation.

#### 5.11.4 Support for Staff, Volunteers and Contractors

Witnessing a child safety incident or receiving a disclosure of abuse or other harm can be a distressing experience for Staff, Volunteers and Contractors involved. The Geelong College assists impacted Staff, Volunteers and Contractors to access necessary support.

Refer to our Employment Assistance Program (EAP)

The Geelong College has also appointed a number of [Child Protection Officer](#), including the Principal, who can support staff members, Volunteers and Contractors when responding to child safety issues and disclosures of abuse or other harm.

## 6. Detail Reporting

### 6.1 Defining the Reportable Conduct Scheme

The **Reportable Conduct Scheme (RCS)** applies to certain types of misconduct involving children committed by employees, volunteers, and contractors within The Geelong College. The RCS is separate from other mandatory reporting obligations and focuses on allegations of:

- i. **Sexual offenses, sexual misconduct, or grooming**
- ii. **Physical violence**
- iii. **Significant emotional or psychological harm**
- iv. **Significant neglect**
- v. **Any other conduct prescribed by regulations**

Under the **Reportable Conduct Scheme**, The Geelong College must ensure:

- i. **Internal Notification:**  
All reportable conduct allegations are reported to the **Principal** or their delegate.
- ii. **External Notification:**  
The Principal must notify the **Commission for Children and Young People (CCYP)** within **three business days** of becoming aware of an allegation.
- iii. **Investigation:**  
The College must conduct an investigation (independent or internal) and provide a written report to the CCYP within **30 calendar days**.
- iv. **Ongoing Risk Management:**

The College must take immediate action to mitigate risk to children while the investigation is ongoing.

### 6.2 External Reporting Requirements

- i. **To the CCYP:** The College will ensure all allegations that meet the RCS threshold are formally reported and investigated.
- ii. **To Victoria Police:** Where criminal conduct is suspected, a police report must be made immediately.
- iii. **To Child Protection (DFFH):** If there is a concern that a child is in immediate danger or at risk of significant harm, a report must be made to **Child Protection**.

### 6.3 Reporting a Child Safety Incident or Concern Internally

This section of the Child Protection Program outlines when and how Staff, Volunteers and Contractors (together referred to as "Staff" or "staff members" for the purposes of this Policy) must report child safety incidents or concerns internally to The College.

While the Principal delegates certain responsibilities for receiving and managing internal reports to certain staff members, the Principal retains ultimate responsibility and accountability for the internal reporting process.

It is important to remember at all times that the safety and welfare of the students are paramount.

Fulfilling the roles and responsibilities in this Policy does not displace or discharge any other obligations that arise if a person reasonably believes that a child is at risk of child abuse or other harm.

#### 6.3.1 Obtain Advice

Child safety situations can be very complex, not only from the perspective of ascertaining whether abuse or other harm has occurred but also in understanding what steps to take to protect the student/s involved.

If you suspect that a student may be experiencing abuse or other harm or that their safety may be at risk, but you are unsure whether your concern rises to the levels required for external reporting to the relevant authority, you should immediately raise your concerns with



one of The Geelong College's [Child Protection Officer](#). The College's [Child Protection Officer](#), will be able to assist you in clarifying your concerns and managing the next steps.

### 6.3.2 Internal Reporting Procedure

#### **Internal Reporting**

- i. Any **allegations of reportable conduct** must be reported immediately to the **Principal** or their delegate.
- ii. If the allegation involves the **Principal**, the report must be made directly to the **Chair of The Geelong College Council**.
- iii. The Principal will assess whether the allegation meets the **Reportable Conduct Scheme criteria** and, if so, notify the **CCYP within three business days**.

All Staff may at any time report any concern for a child's safety, welfare or wellbeing to a [Child Protection Officer](#), the Principal, the Department of Families, Fairness and Housing (Child Protection) or the Police.

All Staff who know or have reasonable grounds to believe that a student:

- i. has been, is being or is likely to be abused or otherwise harmed; or
- ii. is at risk of significant harm, for any reason,

such that Mandatory Reporting to Child Protection, Non-Mandatory Reporting to Child Protection or Reporting to Police is required, must – in addition to reporting externally – report the matter internally.

These internal reports can be made to one of The Geelong College's [Child Protection Officer](#), 246s (who are delegates of the Principal). If the allegations are about the person to whom you would otherwise report internally, you must instead report internally to the Principal or to the Chair of The Geelong College Council.

If the child safety incident or concern involves Reportable Conduct by an employee, then Staff must follow the procedures for Making a Reportable Conduct Report Internally.

Staff must document their internal report in [PROTECT Recording your actions: Responding to suspected child abuse - Template](#)

In addition to reporting internally, all Staff must also follow any appropriate external reporting procedures listed below.

- i. Duty to Protect/Failure to Protect
- ii. Mandatory Reporting to Child Protection
- iii. Non-Mandatory Reporting to Child Protection
- iv. Reporting to Police
- v. Reportable Conduct
- vi. Reporting Teacher Misconduct to the Victorian Institute of Teaching

Reporting the matter internally does not release any staff member from these other legal, regulatory or policy reporting obligations that may arise from the child safety incident or concern.

\*Note also that these external reporting obligations will still apply even if the Principal, the Chair of The Geelong College Council, or a [Child Protection Officer](#), to whom you have reported internally advises you not to report externally, but your concerns reach the threshold required for the external report.

#### [Definitions and Additional Resources](#)

#### [Definitions and Key Indicators of Child Abuse and Other Harm](#)

## **7. Staff Training and Responsibilities**

- i. The Geelong College provides regular training to all **staff, volunteers, and contractors** on their **obligations under the Reportable Conduct Scheme** and other child safety laws.

- ii. **Child Protection Officers** are available to assist staff with understanding reporting obligations.
- iii. Failure to report suspected reportable conduct may result in disciplinary action, including dismissal, and may also carry legal consequences.

## 8. Conclusion

This policy ensures The Geelong College's compliance with all **child safety laws** and strengthens **transparency, accountability, and child protection practices**. The College remains committed to maintaining a **safe environment for all children and young people**.

## 9. Legal Obligations

Children, Youth and Families Act 2005 (Vic)

Child Wellbeing and Safety Act 2005 (Vic)

Crimes Act 1958 (Vic) – Criminal Offenses Related to Child Safety

*Failure to Disclose (s.327)*

Any adult who **fails to report child sexual abuse** to police may face criminal charges.  
**Maximum 3 years imprisonment.**

*Failure to Protect 9s.490)*

Applies to people in authority (e.g., school leaders, managers) who **fail to act on a known risk** of child abuse.

**Maximum 5 years imprisonment.**

*Grooming Offense (s.49M)*

Criminalizes **any act of grooming** a child or their caregiver for sexual abuse.

**Maximum 10 years imprisonment.**

Working with Children Act 2005 (Vic)

Offences Under the Child, Youth and Families Act 2005 (Vic)

Offences Under the Change or Suppression (Conversion) Practices Prohibition Act 2021 (Vic)

## 10. Related Documents

[Statement of Commitment to Child Safety](#)

[Child Safety Code of Conduct](#)

[Child Protection, Environment and safety Policy](#)

[Staff and Student Professional Boundaries](#)

[Obligation to Act to Protect, Making Additional Reports and Mandatory Reporting](#)

[Student Code of Conduct Guidelines](#)

[Student Bullying Harassment Policy](#)

[Equal Opportunity and Inclusivity Student Policy](#)

[Student Wellbeing Policy](#)

[EL & OSHC 2.9 Delivery and Collection of Children Policy](#)

[EL & OSHC 5.1 Interactions with children Policy](#)

[EL & OSHC 2.6 Child Safety Environment Policy](#)

[EL & OSHC 2.24 Supervision of Children Policy](#)

[Child Safety & Wellbeing Poster](#)

[Child Info Sharing Poster](#)

[Who Can I ask For help Poster JS](#)

[Who Can I ask For Help Poster MS](#)

[Who Can I ask For Help Poster SS](#)