Melbourne Archdiocese
Catholic Schools

Child Abuse Identification and Response Policy – PROTECT

1. Introduction

Melbourne Archdiocese Catholic Schools Ltd (**MACS**) is a company limited by guarantee established in 2021 by the Archbishop of the Catholic Archdiocese of Melbourne to assume the governance and operation of MACS schools across the Archdiocese of Melbourne. MACS subsequently established Melbourne Archdiocese Catholic Specialist Schools Ltd (**MACSS**) to provide educational services to children with diverse needs and Melbourne Archdiocese Catholic Schools Early Years Education (**MACSEYE**) to provide early years care and education services.

The Statement of Mission in the MACS Constitution, and the constitutions of its subsidiaries, MACSS and MACSEYE, sets out the Archbishop's expectations of Catholic schooling in the Archdiocese and provides an important context and grounding for the company and the direction which the MACS Board must always observe in the pursuit of the company's objects.

The Board must ensure that all policies and procedures concerning the operations of MACS, and its subsidiaries are consistent with the Statement of Mission and company objects, as well as any directions issued by the Archbishop from time to time.

2. Purpose

The purpose of this policy is to:

- describe how MACS Staff (which includes MACS board directors, board committee members, MACS school staff, volunteers, contractors, other service providers, clergy and those in religious ministry) identify and respond to child abuse concerns, including grooming
- ensure staff use the 4 Critical Actions to identify and respond to child abuse, including grooming, based on the source of abuse
- ensure school staff are aware of and comply with their reporting and legal obligations, including mandatory reporting and reportable conduct obligations, to protect the safety and wellbeing of children and young people
- explain training requirements for school staff.

3. Scope

This policy applies to the MACS board in respect of:

- all MACS schools, including specialist schools operated by MACS subsidiary, Melbourne Archdiocese Catholic Specialist Schools Ltd (MACSS) and school boarding premises operated by MACS schools (MACS schools)
- MACS management
- MACS employees including principals, teachers, other school staff members, casual relief staff, volunteers, contractors, other service providers and those providing religious ministries in MACS schools
- all students while they are:
  - on school premises or engaged in school-related activities
  - participating in school-approved activities on or offsite, including excursions, camps, functions and sporting events, and programs delivered by third-party providers such as another school, registered training organisation or external provider.
- parents and carers when interacting with students in a school context.

4. Statement of Commitment

MACS is committed to creating and maintaining safe, respectful and inclusive environments for all students, with **zero tolerance for child abuse in any setting**.

In fulfilling this commitment, MACS will:

- prioritise the safety, wellbeing and dignity of children and young people
- listen to, respect and empower children and young people
- prevent, identify and respond to child abuse and harm
- respond to reports or concerns in a culturally safe, sensitive and trauma-informed manner, including providing particular support to vulnerable children and students
- address all concerns and complaints seriously, respectfully and in a timely way
- report child abuse complaints and concerns to relevant authorities in accordance with legal obligations
- comply with all recordkeeping, reporting, privacy, legislated information sharing schemes, and employment law obligations.

5. Principles

The following principles underpin the Child Abuse Identification and Response Policy:

- Every student is inspired and enabled to flourish and enrich the world (MACS 2030).
- MACS schools are responsible for safeguarding the safety and wellbeing of all students by identifying risks and implementing proactive measures to prevent reasonably foreseeable harm in school environments and school-approved activities.
- MACS schools owe a duty of care to all students and must maintain adequate facilities, resources, systems and practices to protect student health, safety and wellbeing.
- Student engagement and learning improve when students feel safe and expectations are clear, as outlined in *Vision for Engagement*.
- Strong, respectful partnerships with families and school communities are essential to creating safe, inclusive and enabling learning environments that prioritise student voice, wellbeing and dignity.
- MACS staff are responsible for maintaining and safeguarding the privacy, confidentiality and wellbeing of students in accordance with the Privacy Policy and Collection Notice.

6. Identifying and responding to all forms of child abuse

All staff must act to protect children from child abuse, including grooming, in any physical or online school environment. Staff must identify and respond to child abuse in accordance with the Victorian government's 4 Critical Actions.

6.1 4 Critical Actions

All staff must:

1. Identify child abuse
2. Support students in the school
3. Refer to community services
4. Report abuse to relevant authorities.

Throughout the 4 Critical Actions, staff must:

- respond to an emergency
- adapt to changing circumstances
- document their actions.

The 4 Critical Actions apply to all forms of child abuse, including:

- abuse by an adult engaged, or previously engaged, by the school
- student-to-student abuse, including harmful sexual behaviour
- abuse occurring within the family
- abuse occurring within the community.

Detailed guidance is available on the Department of Education's website:

- tailored resources for Catholic schools
- 4 Critical Actions.

6.2 Abuse by an adult engaged by the school

All allegations, complaints, disclosures and concerns of abuse, including grooming, by an adult who is, or previously was, engaged by a school must be:

- managed in accordance with the 4 Critical Actions to identify and respond to child abuse by an adult engaged by a Catholic school
- reported to the Reportable Conduct Scheme Team via:
  - email: rcs@macs.vic.edu.au
  - telephone: (03) 9267 4200.

The Reportable Conduct Scheme Team in collaboration with the Strategic Communications and Engagement Team, supports principals and Regional Offices to:

- meet reporting and investigation obligations in accordance with the Reportable Conduct Procedures
- assess and manage risks to students and the school community
- implement appropriate, timely and transparent communication where required, including in relation to criminal charges involving current or former staff
- ensure compliance with legal and child safety requirements.

6.3 Student-to-student abuse, including harmful sexual behaviour

School staff may be the sole adult able to identify student-on-student child abuse. Schools must apply the 4 Critical Actions to identify, respond to and manage concerns involving student-to-student abuse: www.vic.gov.au/identify-student-to-student-abuse-schools.

Where harmful sexual behaviour is identified or suspected, schools should ensure appropriate, timely and trauma-informed responses by:

- seeking advice from the Student Wellbeing Information Support Service (SWISS) on 9267 0419
- engaging appropriate external specialist services by contacting their local sexual assault or harmful sexual behaviour service.

6.4 Abuse occurring within the family or community

Where there is reasonable belief that a student is at risk of abuse in the family or community, staff must act in accordance with the 4 Critical Actions to identify and respond to child abuse in the family: www.vic.gov.au/identify-child-abuse-family.

7. Local child abuse response policy and procedures

MACS schools must:

- adopt, contextualise and maintain the Child Safety and Wellbeing procedure template (available on CEVN) and identify the designated child safety contacts

- ensure child safety contacts support staff and school leadership to implement the 4 Critical Actions and PROTECT guidance in response to all complaints, allegations or concerns of child abuse
- publish this policy and procedures on the school's website.

8. Escalating concerns

If a staff member believes appropriate action has not been taken, they must:

- escalate concerns to the principal
- escalate to the relevant MACS regional office if they remain unsatisfied
- report directly to the relevant authorities (for example, Victoria Police or Child Protection) in line with their legal obligations and child safety frameworks.

Allegations or concerns of abuse (including grooming):

- **by a child safety contact**, must be reported to the principal
- **by a principal**, must be reported in accordance with the Reportable Conduct Policy.

9. Child safety frameworks and legal obligations

All staff must understand and comply with applicable legal obligations and child safety frameworks, as set out in PROTECT, including:

- **Child Safe Standards:** implementing actions to create and maintain a child-safe organisation, in accordance with Ministerial Order 1359 (PDF).
- **Duty of Care:** taking reasonable steps to minimise risks of foreseeable harm to students.
- **Failure to disclose:** reporting to police a reasonable belief that a sexual offence been committee against a child, as set out in Legal obligations and child safety frameworks.
- **Failure to protect:** taking action to reduce or remove known risks of child abuse, as set out in Legal obligations and child safety frameworks.
- **Family Violence Multi-Agency Risk Assessment and Management for family violence (MARAM):** meeting obligations to identify, assess and manage family violence risk, as set out in: Family Violence Support.
- **Information sharing schemes Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS):** sharing relevant information in accordance with Child and Family Violence Information Sharing Schemes and Legal obligations and child safety frameworks.
- **Mandatory reporting:** reporting concerns to Child Protection where legal thresholds are met, as set out in Legal obligations and child safety frameworks.
- **Reportable Conduct Scheme:** complying with requirements for reporting and responding to allegations involving persons engaged by the school, as set out in Reportable and Notifiable Conduct.

10. Training requirements

Schools must ensure all staff are equipped with the knowledge and skills required to comply with Child Safe Standard 8 and Ministerial Order 1359 (PDF) to effectively safeguard children and young people. At a minimum, schools must:

- require annual completion of child safety training by all relevant staff
- define the staff cohorts to whom training requirements apply
- retain evidence of training completion at the school level in accordance with recordkeeping requirements.

11. Roles and reporting responsibilities

Role	Responsibility	Reporting requirement (if applicable)
Principal	Ensure all policies for the care, safety and welfare of students are publicly available.	Annual attestation to the Executive Director.
Principal	Ensure that all relevant staff complete annual training in their mandatory reporting obligations, and that the school keeps up-to-date records of this. Where a staff member is unable to perform their role in responding to and/or reporting a matter to authorities, identify an appropriate alternative person and allocate responsibility for responding to and/or reporting the matter to that person.	Training records and attendance to be kept in school.
Principal	Establish and apply school processes to effectively implement the policy and procedures.	
Principal	Report any allegations, complaints, disclosures and concerns of abuse (including grooming) to the Reportable Conduct Unit: rcs@macs.vic.edu.au	
All staff	Identify and report all suspected forms of child abuse.	Mandatory reporting where applicable.
All staff	Understand and apply school processes to ensure consistent application and adherence to policy and procedures.	
Child Safety Unit	Support all staff to coordinate a response relating to student to student sexual abuse via childsafety@macs.vic.edu.au	
Mandatory reporter	Complete annual Mandatory Reporting training. Follow required reporting obligations and processes.	Provision of evidence of training to the school.
All MACS staff	Be aware of and comply with their legal obligations to report suspected child abuse (this may include completing Mandatory Reporting training) and provide ongoing support to all students connected to the concern, complaint or allegation of child abuse. When dealing with an incident or disclosure of suspicion of child abuse, ensure that the principal and school leadership team are made aware. When a staff member who has witnessed a child abuse incident, received a disclosure or developed a suspicion of child abuse is unable to perform their role in responding to and/or reporting the matter, the staff member must inform the principal.	Principal or MACS Manager to follow the Child Safety and Wellbeing Recordkeeping Procedures for child safety records. 4 Critical Actions to be followed.

12. Procedures

Procedures to implement and support this policy are published separately and available on the school's website. The procedures must be contextualised by each principal using the approved template and the supporting documents referenced below.

13. Reportable Conduct

We are committed to ensuring all MACS Staff understand their obligations to report child safety incidents and concerns. MACS will:

- educate staff on the Reportable Conduct Scheme during the induction process and through ongoing training.
- immediately act to ensure the child's safety and wellbeing and report the matter internally to the Reportable Conduct Scheme Team and relevant authorities and
- provide clear guidelines on the reporting process and ensure it is accessible to all MACS Staff.

MACS will ensure any allegations of Reportable Conduct involving Staff are addressed promptly and appropriately. We will:

- report any allegations of reportable conduct to the Social Services Regulator (SSR) within three business days and
- conduct thorough investigations and take appropriate actions based on the findings.

14. Recordkeeping

Child Safety and Wellbeing policies and records will be kept in line with Ministerial Order 1359 and MACS policies and procedures for information and records management. All staff, including casual relief staff, contractors and volunteers must receive appropriate training about the collection, use, storage and disposal of child safety and wellbeing records.

Where there is any inconsistency between the Ministerial Order 1359 and MACS policies, the Ministerial Order will prevail.

All child safety and wellbeing records are to be kept in a secure manner in accordance with the MACS recordkeeping policies and procedures, which must detail the processes the school has in place to meet the Public Record Office Victoria Recordkeeping Standards.

15. Definitions

Definitions related to child safety can be found at: Child Safe Standards: definitions.

Definitions of standard terms used in this Policy can be found in the Glossary of Terms.

Student sexual offending

Student sexual offending means sexual behaviour by a student 12 years and over which may amount to a sexual offence. A sexual offence includes rape, sexual assault, indecent acts and other unwanted sexualised touching.

Under Victorian law:

- children between 12 to 15 can only consent to sexual activity with another child no more than 2 years older (therefore sexual contact by a student with a child outside of this age range may be student sexual offending)
- for a person to consent to sexual activity, they must have the capacity to understand the context and possible consequences of the act. Therefore, sexual contact by a student involving a person with a cognitive impairment or affected by alcohol or other drugs may be student sexual offending.

16. Related policies and documents

Supporting documents

PROTECT Procedure: Police or Child Protection Interviews at school
PROTECT Procedure: Responding to Requests from Victoria Police and Child Protection

Related MACS policies and documents

Code of Conduct for MACS Staff
Child Safety and Wellbeing Policy
Child Safety and Wellbeing Procedures
Child Safety and Wellbeing Recordkeeping Procedures
Child Safety Code of Conduct
Child Safety Recruitment Procedures
Complaints Handling Policy
Duty of Care Policy for MACS Schools
Engaging Families in Child Safety Procedures
ICT Acceptable Usage Policy - Students
Information and Records Management Policy – MACS offices
Pastoral Care Policy
Reportable Conduct Policy
Risk Management Policy
Supervision Policy

Resources

Child Information Sharing Scheme
Child Information Sharing and Family Violence Reforms on the CEVN website
DET Mature Minors and Decision Making (2020)
Family Violence Information Sharing Scheme
National Framework for Protecting Australia's Children 2021–2031
PROTECT | vic.gov.au

17. Legislation and standards

Children, Youth and Families Act 2005 (Vic)

Child Wellbeing and Safety Act 2005 (Vic)

Crimes Act 1958 (Vic) – including three criminal offences under this Act:

- Failure to disclose offence: Any adult who forms a reasonable belief that a sexual offence has been committed by an adult against a child under 16 has an obligation to report that information to police. Failure to disclose the information to police is a criminal offence.
- Failure to protect offence: This offence will apply where there is a substantial risk that a child under the age of 16 under the care, supervision or authority of a relevant organisation will become a victim of a sexual offence committed by an adult associated with that organisation. A person in a position of authority in the organisation will commit the offence if they know of the risk of abuse and have the power or responsibility to reduce or remove the risk, but negligently fail to do so.
- Grooming offence: This offence targets predatory conduct designed to facilitate later sexual activity with a child. Grooming can be conducted in person or online, for example via interaction through social media, web forums and emails.

Education and Training Reform Act 2006 (Vic)
Education and Training Reform Regulations 2017 (Vic)
Equal Opportunity Act 2010 (Vic)
Ministerial Order 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises
Privacy Act 1988 (Cth)
Public Records Act 1973 (Vic)
Worker Screening Act 2020 (Vic)
Wrongs Act 1958 (Vic)

18. Policy information

Responsible executive	Director, Education Excellence
Policy owner	General Manager, Child Safety
Approving authority	MACS Board
Assigned board committee	Child Safety and Risk Management Committee
Approval date	23 June 2026
Risk rating	Extreme
Review by	June 2028
Publication	MACS website, CEVN, Gabriel, school websites

POLICY DATABASE INFORMATION	
Assigned framework	Child Safety
Supporting documents	See list of supporting documents and related policies above
Superseded documents	PROTECT: Identifying and Responding to Abuse – Reporting Obligations Policy PROTECT Procedure: Police or Child Protection Interviews at school PROTECT Procedure: Responding to Requests from Victoria Police and Child Protection PROTECT Procedure: Informing staff of reporting obligations PROTECT Procedure: Responding to offences under the Crimes Act 1958 (Vic) PROTECT Procedure: Responding to all forms of child abuse PROTECT Procedure: Responding to student sexual offending
New	MACS Child Abuse Identification and Response Policy PROTECT Procedure: Police or Child Protection Interviews at school PROTECT Procedure: Responding to Requests from Victoria Police and Child