

Child Safety Policy, Code of Conduct and Procedure

Policy Development and Management

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1. CHILD SAFETY POLICY

1) Introduction

All Schools are required to implement the Child Safe Standards and the mandatory reporting guidelines from the Victorian Government's amendment to the *Children, Youth and Families Act 2005 (Vic)* ("**CYFA**").

Northside Christian College ("**the College**") is committed to promoting and protecting the safety and wellbeing of all children. We have zero tolerance for child abuse.

Everyone working at the College is responsible for the care and protection of children and reporting information about child abuse.

If any person believes a child is in immediate risk of abuse, telephone 000.

2) Statement of Purpose

The purpose of this policy is to:

- outline the College's approach to Child Welfare;
- prevent child abuse occurring within all College Environments;
- work towards an organizational culture of child safety;
- ensure that all parties are aware of their responsibilities for identifying possible occasions for child abuse and for establishing controls and procedures for preventing such abuse and/or detecting such abuse when it occurs;
- provide guidance on action that should be taken where a person suspects any child abuse within a College Environment;
- provide a clear statement to staff, directors, volunteers and contractors forbidding any such abuse; and
- provide assurance that any and all suspected abuse will be reported and fully investigated.

For the purposes of this Policy, "College Environment" means any physical or virtual place made available or authorised by the College's governing authority for use by a child during or outside College hours, including:

- a campus of the College;
- online College environments (including email and intranet systems); and
- other locations provided by the College for a child's use (including, without limitation, locations used for camps, sporting events, excursions, competitions, and other events).

3) Scope

This Policy applies to all staff, directors, volunteers, contractors and students enrolled at the College.

4) Guiding principles

This Policy is based on the following principles:

- the College has zero tolerance for child abuse;
- the best interests of the child are paramount;

- child protection is a shared responsibility;
- all children have a right to feel safe and be safe at school, and have equal rights to protection from abuse;
- the College will consider the opinions of students and use their opinions to develop child protection policies and procedures;
- the College will take into account the diversity of all children, including (but not limited to) the needs of Aboriginal and Torres Strait Islander children, children from culturally and linguistically diverse backgrounds, children with disabilities, and children who are vulnerable, and make reasonable efforts to accommodate these matters;
- the College is committed to the cultural safety of Aboriginal children, and those from culturally and/or linguistically diverse backgrounds, and to providing a safe environment for students living with a disability; and
- everyone covered by this Policy must also comply with the College's Code of Conduct, which sets stringent standards for personal behaviour.

5) Definitions

Child abuse includes:

- a) any act committed against a child involving
 - a. a sexual offence; or
 - b. an offence under section 498(2) of the Crimes Act 1958 (grooming); and
- b) the infliction, on a child, of-
 - a. physical violence; or
 - b. serious emotional or psychological harm; and
- c) serious neglect of a child.

"Child" means a person enrolled as a student at the College and under the age of 17 years unless otherwise stated under the law applicable to the Child. Collective term for "Child" is "Children".

6) Child Protection Workers

Nominated Child Protection Workers are available to listen, discuss and clarify issues confronting individual teachers in relation to child physical and sexual abuse. The Child Protection Workers will make reports on behalf of the College and ensure that adequate records are maintained. The College's Child Protection Workers are the Head of Welfare and the Chaplain.

7) Reporting Obligations

The CYFA requires certain professionals to make a report to the Department of Health and Human Services ("DHHS") when, in the course of their position or employment:

- they form a belief on reasonable grounds that a child is in need of protection because the child has suffered, or is likely to suffer, significant harm as a result of physical injury or sexual abuse; and
- the child's parents or caregiver have not protected, or are unlikely to protect the child from harm.

At the College, mandatory reporters include the Principal, registered teachers and psychologists employed by the College ("**Mandatory Reporters**").

Under the CYFA, mandatory reporters are required by law to notify the DHHS, as soon

as practicable after forming such a belief, and after each occasion on which they become aware of any further reasonable grounds for the belief.

It is not mandatory to report emotional and psychological abuse or neglect, but you are at liberty to do so.

Reasonable Grounds for Belief

You have reasonable grounds to notify when:

- a child tells you that he/she has been physically or sexually abused;
- a child states that they know someone who has been physically or sexually abused (sometimes the child is talking about themselves);
- someone else, such as a relative, friend, acquaintance or sibling of the child, tells you that a child has been abused;
- your observations of the child's behaviour or knowledge of children lead you to believe that the child has been abused; or
- you observe physical signs or indicators of abuse (e.g. bruises, cuts etc.).

NB: We encourage reporting where you hold a concern about the safety of a Child.

Voluntary Reporting

In addition to the mandatory reporting obligations above, any person who believes on reasonable grounds that a child is in need of protection from child abuse, may disclose that information to the Police or the DHHS. If a person would like internal guidance or support with addressing their concerns, they are encouraged to speak with the Child Protection Workers and/or the Principal.

Obligation to Report Child Sexual Abuse

In addition to the obligations above, any person who receives information that leads them to form a reasonable belief that a sexual offence has been committed in Victoria against a child (under the age of 16 years) by another person (of or over the age of 18 years), has a legal obligation to disclose that information to the Police as soon as it is practicable. Individuals who fail to comply with this obligation under the *Crimes Act 1958* (Vic) could face up to three years' imprisonment.

During 2014, the Victorian Government amended the Crimes Act 1958 (Vic) (Crimes Act) by establishing three new offences for the purpose of protecting children under 16 years of age from sexual abuse.

- Grooming Offence
- Failure to Protect Offence
- Failure to Disclose Offence

The College supports and encourages staff, directors, volunteers and contractors to make a report to the Police or the DHHS if they form a belief on reasonable grounds that a child is in need of protection, or they are concerned about the safety, health or wellbeing of a child.

Protection of Reporters

Any employee, director, volunteer, contractor or student that makes a report in good faith in accordance with their reporting obligations will be supported by the College, and will not be penalised by the College for making the report.

If an employee, director, volunteer or contractor is uncertain as to whether they should make a report to an external authority in relation to the safety of a child, they must speak to the Child Protection Workers and/or the Principal for guidance and information. Ultimately,

it is a personal decision of the employee, director, volunteer or contractor whether they choose to make a report to an external authority or not.

8) Prevention

Recruitment

The College undertakes a comprehensive recruitment and screening process for all staff, directors, volunteers and contractors which aims to:

- promote and protect the safety of all children within all College Environments;
- identify and recruit the safest and most suitable candidates who share the College's values and commitment to protect children; and
- prevent a person from working at the College if they pose an unacceptable risk to children.

Each job or category of jobs for College staff, directors, volunteers and contractors that involves child-connected work will have a clear statement that sets out:

- the job's requirements, duties and responsibilities regarding child safety; and
- the job occupant's essential or relevant qualifications, experience and attributes in relation to child safety.

All applicants for jobs that involve child-connected work for the College will be informed about the College's child safety practices (including the Child Safety Policy, Code of Conduct and Procedure).

All staff engaged by the College as classroom teachers must be registered with the Victorian Institute of Teaching, which includes Working with Children Checks ("WCC"). Teachers must provide evidence of such registration before they commence employment, and are informed of the College's Child Safety Policy, Code of Conduct and Procedure within their Letter of Appointment.

All non-teaching staff, directors, volunteers and contractors engaged at the College are required to have a current WCC prior to being engaged by the College. The Principal's PA records all WCCs on a spreadsheet that is checked annually to see who requires a renewal.

The College will conduct thorough reference checks to ensure the suitability of all candidates prior to their engagement. This will include the College making reasonable efforts to gather, verify and record the following information about a person whom it proposes to engage to perform child-connected work:

- WCC status, or similar check;
- proof of personal identity and any professional or other qualifications;
- the person's history of work involving children; and
- references that address the person's suitability for the job and working with children.

The type of evidence that an applicant is required to provide to the College will vary depending on the type of position that they are applying for. However, the College will not offer any applicant a position at the College until they provide the required evidence to the Principal.

The College will exercise discretion and may require applicants to provide a police check in accordance with the law and as appropriate, before they commence working at the College and during their time with the College in regular intervals.

Once engaged, the College will provide staff, directors, volunteers and contractors with access to the Child Safety Policy, Code of Conduct and Procedure and staff, directors, volunteers and contractors must review and acknowledge their understanding of the Child Safety Policy, Code of Conduct and Procedure.

Risk Management

The College will ensure that child safety is a part of its overall risk management approach.

The College will have a risk and compliance sub-committee committed to identifying and managing risks within all College Environments. Risk Management sub-committee members will receive regular training in relation to child safety.

If the risk and compliance sub-committee identifies risks of child abuse occurring in one or more College Environments the committee will make a record of those risks and specify the action(s) the College will take to reduce or remove the risks (i.e. risk controls).

As part of its risk management strategy and practices, the risk and compliance sub-committee will monitor and evaluate the effectiveness of the implementation of its risk controls.

The College will ensure that appropriate training at least annually is conducted for:

- Directors;
- Committee of Management Members;
- Senior Leadership;
- Staff;
- Contractors;
- Students; and
- Volunteers.

In relation to staff, the College will provide them with regular awareness on mandatory reporting and protection of children education. The online mandatory reporting eLearning module is available for staff to complete, **it is expected all staff will complete the eLearning module annually**. The online mandatory reporting eLearning module can be accessed at:

<http://www.elearn.com.au/deecd/mandatoryreporting/external>.

The Username is **education** and password **external**

9) Communication

The College is pro-active in the area of prevention and will communicate the Child Safety Policy, Code of Conduct and Procedure in the manner below. The Principal, through the appropriate stakeholders, is responsible for disseminating and communicating the Child Safety Policy, Code of Conduct and Procedure in the manner below.

STUDENTS	PARENTS, GUARDIANS, COMMUNITY, SPONSORS, PARTNERS	EMPLOYEES, VOLUNTEERS, CONTRACTORS, BOARD MEMBERS
• Conditions of	• Conditions of enrolment	• Website

enrolment <ul style="list-style-type: none"> • Website • College assemblies • Student Wellbeing Programs 	(Parents will receive a hard and electronic copy) <ul style="list-style-type: none"> • Website • Parent information evenings • College newsletter 	<ul style="list-style-type: none"> • Letters of appointment/ contracts • New employees, directors, volunteers and contractors Induction Training and refresher training • Annual Training Session
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10) Responding & Reporting

In the event of a child disclosing an incident of abuse to someone they trust it is essential that it is dealt with sensitively and professionally. The College will take all steps to ensure that the safety of the child is paramount, and will apply the College's Child Safety Procedure.

Investigation

The College will appropriately investigate all allegations relating to an incident of abuse in accordance with its obligations and to the extent reasonably practicable. In some circumstances, it may be necessary for the College to conduct an investigation in addition to any investigation conducted by authorities (e.g. the police).

The Principal will conduct an independent investigation into the allegation to the extent that it will not interfere with investigations by DHHS or the police, and will co-operate with the authorities as required.

If an allegation is made against an employee, director, volunteer or contractor, the Principal will follow the reporting procedure and take all steps to ensure that safety of the child is paramount. During the investigation it may be necessary to withdraw the accused person from active duty, which could entail standing down, reassignment to a role without direct contact with children, working under closer supervision during the investigation, working from home, or any other measures deemed appropriate depending on the seriousness of the allegation.

All people covered by the Child Safety Policy, Code of Conduct and Procedure must co-operate fully with any investigation by DHHS, the police or the College.

The Principal will make every effort to keep any such investigation confidential; however, from time to time other employees, directors, volunteers and contractors may need to be consulted in conjunction with the investigation (e.g. to provide witness statements).

An investigation conducted by the College will be conducted in accordance with procedural fairness to protect the integrity of the investigation and the interests of all the participants involved in the investigation. The College will also handle the allegations in a confidential manner to the greatest extent possible.

In some circumstances, it may be appropriate for the College to engage a person (or persons) from outside the College to conduct an independent investigation in relation to allegations.

The outcome will depend on the findings of the investigation, but may include withdrawal from active duty, re-assignment to duties with no contact with children, increased supervision, disciplinary action, dismissal or criminal prosecutions.

11) Support

It is essential that reports are managed in a caring, supportive and confidential manner.

Support for the victim, and any staff member, director, volunteer and contractor affected by the inappropriate conduct, should be arranged as soon as possible.

Access to the College's Chaplain will be promoted and Heads of School shall monitor the wellbeing of the responding staff member and any other affected staff member, director, volunteer or contractor of the College.

12) Record keeping

All reports of alleged abuse or harm, or risk thereof, must be recorded in the form of a Child Welfare Reporting Record (see the College's Child Safety Procedure). Places, times, dates, names of people, observable behaviours or evidence of harm are what is recordable. Reports must be securely stored by the Head of Welfare.

13) Privacy and Confidentiality

The College will collect, use, disclose and hold personal information in accordance with the *Privacy Act 1988* (Cth) and the Privacy Policy.

Principles

There are two guiding principles in respect to a child's privacy.

- First, the College will operate on the best interests principle. All employees, directors, volunteers and contractors will do what they believe to be in the best interest of the child. This principle supersedes all others.
- Second, the College will respect a child's confidentiality, except in situations where it conflicts with the best interests principle.

As much as is reasonably possible, an individual's confidentiality is to be protected. Both those who are making reports and those about whom accusations are being made are entitled to confidentiality. Where there is suspected abuse or misconduct, employees, directors, volunteers and contractors must not disclose or make use of the information in a manner that breaches confidentiality, other than to report and act consistent with the Child Safety Policy, Code of Conduct and Procedure, and relevant statutory requirements.

14) Further Information

Further information concerning any aspect of Mandatory Reporting obligations may be directed to the College's Child Protection Workers. The Staff Handbook has information about Child FIRST.

Copies of *Responding to Child Abuse* - a booklet that has been developed to assist those professionals whose work brings them into contact with children and young people, is available via the Department of Human Services (children youth & families) website www.cyf.vic.gov.au. Other Child Protection Publications are also available via this link.

The Department of Education and Early Childhood Development's *Student Safety section* also includes information on child protection and mandatory reporting.

15) Responsibilities

Committee of Management

The Committee of Management of Northside Christian College has ultimate responsibility for the detection and prevention of child abuse and is responsible for ensuring that appropriate and effective internal control systems are in place. The Committee of Management is also responsible for ensuring that appropriate policies and procedures and a Child Safety Code of Conduct are in place.

Principal

The Principal of Northside Christian College is responsible for:

- Dealing with and investigating reports of child abuse;
- Ensuring that all staff, contractors, and volunteers are aware of relevant laws, College policies and procedures, and the College's Child Safety Code of Conduct;
- Ensuring that all adults within the Northside Christian College community are aware of their obligation to report suspected sexual abuse of a child in accordance with these policies and procedures;
- Ensuring that all staff, contractors and volunteers are aware of their obligation to observe the Code of Conduct (particularly as it relates to child safety);
- Providing support for staff, contractors and volunteers in undertaking their child protection responsibilities.

Heads of School / Directors of Learning

All Heads of School / Directors of Learning must ensure that they:

- Promote child safety at all times;
- Assess the risk of child abuse within their area of control and eradicate / minimise any risk to the extent possible;
- Educate employees about the prevention and detection of child abuse; and
- Facilitate the reporting of any inappropriate behaviour or suspected abusive activity.

The Executive Team should be familiar with the types of abuse that might occur within their area of responsibility and be alert for any indications of such conduct.

Child Safety Officer

The primary purpose of the position is to manage the implementation of the Child Safety Policy (Policy No. 1), especially in relation to training and educating staff and students and to manage any incidents of reporting to ensure Northside Christian College is compliant with all legislation around such reporting.

The Child Safety Officer is a contact person for children, young people, parents, employees and volunteers to seek advice and support regarding the safety and wellbeing of children and young people within our College.

The role requires the officer to take action when child protection concerns are reported, including the provision of support to those within the community who have been affected, with an understanding and respect for cultural diversity.

Northside Christian College has appointed Ms Fiona Dumitrache as the College's Child Safety Officer.

Child Protection Workers

The Child Protection Workers have the specific responsibility for responding to any complaints made by staff, volunteers, parents or students in relation to Child Safety. The Child Protection Workers at Northside Christian College will always work concurrently with the Principal and other College leaders.

The College's Child Protection Workers are Ms Fiona Dumitrache, Head of Welfare and Mr Jared Stocks, College Chaplain.

All Staff / Volunteers / Contractors

All staff / volunteers / contractors share in the responsibility for the prevention and detection of child abuse, and must:

- Familiarise themselves with the relevant laws, the Code of Conduct, Northside Christian College's policy and procedures in relation to child protection, and comply with all requirements;
- Report any reasonable belief that a child's safety is at risk to the relevant authorities (such as the police and / or the state- based child protection service) and fulfill their obligations as mandatory reporters;
- Report any suspicion that a child's safety may be at risk to their supervisor (or, if their supervisor is involved in the suspicion, to a responsible person at the College); and
- Provide an environment that is supportive of all children's emotional and physical safety.

16) Review

This policy will be reviewed as part of the College's three-year review cycle. Following every reportable incident, a review shall be conducted to assess whether the College's child protection policies or procedures require modification to better protect the children under the College's care.

17) Related Documents

- Supervision Policy (Policy No. 22)
- Staff Contact with Students Policy (Policy No. 11)
- Student Travel in Staff Cars Policy (Policy No. 38)
- Staff Induction Policy (Policy No. 9)
- Employment Policy (Policy No. 2)
- Working with Children Check Policy (Policy No. 40)
- Police Checks Policy (Policy No. 31)
- Visitors to the College (Policy No. 3)
- Volunteers Policy (Policy No. 32)
- Grievance and Complaints Management Policy (Policy No. Policy No. 14)
- Whistle Blower Policy (Policy No. 39)

Prescriptive legal and regulatory requirements include:

- Ministerial Order 870
- Children, Youth and Families Act 2005
- Child Wellbeing and Safety Act 2005 (Vic)
- Education and Training Reform Act 2006
- Crimes Act 1958 (Vic)
- Working with Children Act 2005
- Family Violence Protection Act 2008
- Victorian Institute of Teaching Act 2001

Grooming Offence

The *Crimes Amendment (Grooming) Act 2014* (Vic) amended the Crimes Act from 1 July 2014 by inserting the following section:

- s.49B – Grooming for sexual conduct with child under the age of 16 years

Under s.49B(2), the criminal offence is as follows:

“A person of or over the age of 18 years must not communicate, by words or conduct, with a child under the age of 16 years or a person under whose care, supervision or authority the child is (whether or not a response is made to the communication), with the intention of facilitating the child’s engagement in or involvement in a sexual offence with that person or another person who is of or over the age of 18 years”.

This offence carries a penalty of imprisonment for up to 10 years.

The Principal will ensure that Senior School students who are 18 years of age or over who may be appointed to coach sport teams, be involved in peer support programs or assist with out-of-school programs, will also be made fully aware of the Grooming Offence.

For further information, refer to Appendix A – Betrayal of Trust Factsheet: The new “Grooming” Offence produced by the Department of Justice.

Failure to Protect Offence

The *Crimes Amendment (Protection of Children) Act 2014* (Vic) amended the Crimes Act from 27 October 2014 by inserting:

- s.49C Failure by person in authority to protect child from sexual offence.

This section was intended to be operative from 1 July 2015 but, on 7 October 2014, the Victorian Government announced its commencement from 27 October 2014.

Under s.49C, it is now a criminal offence for a person who:

“(a) by reason of the position he or she occupies within a relevant organisation, has the power or responsibility to reduce or remove a substantial risk that a relevant child will become the victim of a sexual offence committed by a person of or over the age of 18 years who is associated with the relevant organisation; and

(b) knows that there is a substantial risk that the person will commit a sexual offence against a relevant child - must not negligently fail to reduce or remove that risk”.

This offence carries a penalty of imprisonment for up to 5 years.

As soon as any person in authority within Northside Christian College becomes aware of a risk of child sexual abuse, the person will be under a duty to take steps to remove or reduce that risk.

For further information, refer to Appendix B – Betrayal of Trust Factsheet: The new ‘failure to protect’ Offence produced by the Department of Justice.

Failure to Disclose Offence

The *Crimes Amendment (Protection of Children) Act 2014* (Vic) amended the Crimes Act from 27 October 2014 by inserting:

- s.327 Failure to disclose sexual offence committed against a child under the age of 16 years
- s.328 Protection of those who disclose under section 327

- s.329 Evidence and legal proceedings
- s.330 Confidentiality.

These sections were intended to be operative from 1 July 2015 but, on 7 October 2014, the Victorian Government announced their commencement from 27 October 2014.

Reporting child sexual abuse is regarded as a community-wide responsibility. Section 327 of the Crimes Act imposes a clear legal duty upon all adults to report information about child sexual abuse to police.

Any adult who forms a reasonable belief that a sexual offence has been committed by an adult against a child under 16 years of age has an obligation to report that information to police. Failure to disclose the information to police is a criminal offence, with a penalty of imprisonment for up to three years.

This obligation is different to mandatory reporting obligations under child protection laws and applies to all adults, not just the professionals currently subject to mandatory reporting (i.e. registered teachers, principals and nurses).

For further information, refer to Appendix C – Betrayal of Trust Factsheet: The new ‘failure to disclose’ Offence produced by the Department of Justice.

Additional Support

Department of Health and Human Services Child Protection
– North Division Intake: Telephone: 1300 664 977.

Child Protection Crisis Line – 24 Hours, seven days a week.
Telephone: 13 12 78

Document History

- Document first published and approved: November 2016
- Updated by the Deputy Principal on the 25th January 2017 in preparation for publishing on the College website.
- Updated by the Deputy Principal in the 2nd June 2017 providing greater clarity of roles and responsibilities.

2. CODE OF CONDUCT

2.1 Introduction

Staff, directors, volunteers and contractors at the College are required to abide by this Code.

The purpose of this Code is to promote child safety within all College Environments.

The following list of behaviours includes examples of what is acceptable and not acceptable behaviour.

2.1 Acceptable Behaviours

All people involved in the care of children on behalf of, or in connection with, the College must:

- a) contact the police if a child is at immediate risk of abuse (telephone '000');
- b) adhere to the Child Safety Policy and Procedure and uphold the College's statement of commitment to child safety at all times;
- c) take all reasonable steps to protect children from abuse;
- d) conduct themselves in a manner consistent with their position as a staff member, director, volunteer or contractor of the College and as a positive role model to children and young people;
- e) work towards the achievement of the aims and purposes of the organisation;
- f) be responsible for relevant administration of programs and activities in their area;
- g) maintain a duty of care towards others involved in these programs and activities;
- h) establish and maintain a child-safe environment in the course of their work;
- i) be fair, considerate and honest with others;
- j) treat children and young people with respect and value their ideas, opinions and backgrounds;
- k) promote the cultural safety, participation and empowerment of Aboriginal and Torres Strait Island children (for example, by never questioning an Aboriginal and Torres Strait Island child's self-identification);
- l) promote the safety, participation and empowerment of children with culturally and/or linguistically diverse backgrounds (for example, by having a zero tolerance of discrimination);
- m) promote the safety, participation and empowerment of children with a disability;
- n) listen and respond to the views and concerns of children, particularly if they are telling you that they are or another child has been abused or that they are worried about their safety/the safety of another child;
- o) ensure (as far as practicable) that adults are not alone with a child;
- p) comply with all reporting obligations as they relate to mandatory reporting and reporting under the *Crimes Act 1958* (Vic);
- q) raise concerns about suspected abuse with the Head of Welfare, Chaplain, Deputy Principal or Principal as soon as possible;

- r) record and act upon all allegations or suspicions of abuse, discrimination or harassment;
- s) if an allegation of child abuse is made, ensure as quickly as possible that the child(ren) are safe;
- t) be professional in their actions;
- u) maintain strict impartiality;
- v) comply with the College's guidelines on contact with children, including via social electronic media;
- w) respect confidentiality when sharing information about children in accordance with the Child Safety Policy and Procedure and your reporting obligations;
- x) maintain a child-safe environment for children and young people; and
- y) operate within the policies and guidelines of the College.

2.2 Unacceptable Behaviour

All people involved in the care of children on behalf of the College must not:

- a) ignore or disregard any suspected or disclosed child abuse;
- b) put a child at risk of abuse (for example, by locking doors for an improper reason);
- c) speak to a child in a way that is or could be construed by any observer as harsh, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Some examples are:
 - i. swearing or using inappropriate language in the presence of a child;
 - ii. yelling at a child, except in an emergency situation where the child's safety may be in danger;
 - iii. use of hurtful sarcasm.
- d) discuss sexual activities with a child unless it is a specific job requirement and the person is trained to discuss these matters, or the child is a member of your family;
- e) have contact with a student outside of the College without the consent of their parent or carer and, if the contact involves after hours tutoring, private instrumental/other lessons or sport coaching of a student (other than a member of your family), with the prior consent of the College. Accidental/incidental contact, such as:
 - i. attending a friend's BBQ in which students are attending;
 - ii. attending church and/or church activities in which students are attending; and
 - iii. any other incidental contact that is outside of your professional relationship with the child and that is not for an improper purpose,
 is appropriate;
- f) have any online contact with a child or their family outside of necessary contact, e.g. by providing e-newsletters, assisting students with their school work, on Schoology or by email;

- g) use any personal communication channels/devices such as a personal email account to communicate with a child (unless the child is a member of your family);
- h) exchange personal contact details such as phone number, social networking sites or email addresses with a child (unless the child is a member of your family);
- i) use, possess, or be under the influence of alcohol while in the presence of or while supervising a child (unless the child is a member of your family or your contact with the child is accidental/incidental and you are not performing your professional obligations);
- j) use, possess, or be under the influence of illegal drugs while in the presence of or while supervising a child;
- k) provide or allow a child to consume alcohol or illegal drugs
- l) initiate unnecessary physical contact with a child or young person, or do things of a personal nature for them that they can do for themselves
- m) engage in rough physical games;
- n) hold, massage, kiss, cuddle or touch a child in an inappropriate and or/culturally insensitive way
- o) engage in any sexual contact with a child. For the purposes of this Code, sexual contact is defined as vaginal intercourse, anal intercourse, oral intercourse or the touching of an erogenous zone of another (including but not limited to the thighs, genitals, buttocks, pubic region or chest) for the purpose of sexually arousing or gratifying either person;
- p) take a child to their home or encourage meetings outside program activities (unless the child is a member of your family or written parental permission has been provided);
- q) be naked in the presence of a child (unless the child is a member of your family);
- r) possess sexually explicit printed materials (magazines, cards, videos, films, clothing, etc.) in the presence of children;
- s) sleep in the same beds, sleeping bags, rooms or tents with a child (unless the child is a member of your family);
- t) discriminate against any child, including because of age, gender identity, sex, race, culture, sexuality, or disability;
- u) engage in any activity with a child that is likely to physically or emotionally harm them;
- v) be alone with a child unnecessarily and for more than a very short time
- w) develop a 'special' relationship with a specific child for their own needs
- x) show favouritism through the provision of gifts or inappropriate attention
- y) photograph or video a child without the consent of the child and his/her parents or guardians;
- z) do anything in contravention of the College's policies, procedures or this Code of Conduct.

2.3 Physical Contact / Touching

All teachers are also required to follow the Victorian Institute of Teaching's ("VIT") Code of Conduct. Example:

- a) *Principle 1.2: Teachers treat their students with courtesy and dignity:*
 - i. work to create an environment which promotes mutual respect;
 - ii. model and engage in respectful and impartial language;
 - iii. protect students from intimidation, embarrassment, humiliation or harm.

Staff members, directors, volunteers, and contractors are prohibited from using physical discipline in any way for behaviour management of children. This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate behaviours by children.

Physical contact may be required in an emergency situation to remove children quickly from danger or threat of danger.

Appropriate contact between staff members, directors, volunteers, contractors, and children is part of normal human relationships. Some considerations and guidelines include the following:

- a) consider the child's age, developmental level, maturity and level of care required, for example, touching a child to gain their attention, guiding or comforting a distressed child;
- b) work in an open environment; for example, in confidential interviews or a one-to-one meeting, the door should be open with visual access. Exceptions apply for professions with strict confidentiality requirements;
- c) be alert to cues from children about how comfortable they are in your proximity and respect their need for personal space;
- d) be sensitive when interacting with children who may misinterpret your actions, such as those who may have been traumatised by abuse or adolescents seeking attention from a member of the opposite sex;
- e) be aware of cultural norms that may influence the interpretation of your behaviour;
- f) be cautious about physical contact in games or practical instruction. If you need to make physical contact for demonstrations, explain the activity and what you will do, maintain a safe and appropriate distance;
- g) physical contact should be made in a way that makes children feel comfortable, for example, shaking hands, a congratulatory pat on the back or rub on the side of their arm for reassurance. Massaging a child or allowing a child to massage you is inappropriate physical contact (unless the child is a member of your family and you comply with all relevant legislation).

Physical contact with a child should be avoided where possible.

2.4 Transportation and off-site events

Other than in an emergency or other abnormal situation where no other option could be reasonably foreseen, it is not acceptable to transport children without written permission of their parent, carer or guardian.

It is prohibited to have unnecessary and/or inappropriate physical contact with children while in vehicles.

Children should be transported directly to their destination. No stops should be made other than those that are reasonably scheduled for meals or comfort stops. This obligation does not apply to children that are a member of your family.

It is prohibited to have children spend the night at the residence of a staff member, director, volunteer or contractor without parental/guardian prior approval.

Changing and showering facilities or arrangements for adults must be separate from facilities or arrangements for children (unless the child is a member of your family).

2.5 Pastoral Care

Subject to the above restraints, pastoral care of students at the College takes place within the context of relationships. The College values each person, without discrimination, and seeks to provide an environment of acceptance, encouragement, challenge, safety and care.

Teachers seek to develop strong relationships with students and their families, in order to provide emotional support and spiritual care. This is enabled in the classroom, in homeroom groups and during extra-curricular activities, such as whole school activities, camps, excursions, sporting events and information/parent evenings.

Teachers, acting in support of parents, seek to discipline students towards genuine Christ-like behaviour, modelling and encouraging mutual respect, integrity and accountability.

Students are given clear guidelines regarding behaviour and are expected to contribute towards a positive learning and social community. Guidance, correction and restoration are a part of pastoral care, and contribute to the development of community and good citizenship. In the terminology of Christian community, students are encouraged to become followers of Christ in His life and teaching.

1. Secondary Students

Secondary students are grouped in year levels. On Monday and Friday mornings, Assembly and Chapel are held in the Middle School Building. On Tuesday, Wednesday and Thursday mornings homegroup is held, where teachers and students share devotions, reflective of the College's Biblical Christian Worldview and core values, inclusive of life stories, anecdotes and strategies, in order to encourage further development of students' sense of value, reiterating the importance of being a part of the community. Home Group teachers mark rolls and check for uniform compliance.

2. Primary Students

Primary students meet with their classroom teachers during the first session of the day to mark rolls, for devotions and for both personal and group connections.

They also participate in specific skill and strategy development for social and emotional learning through the "You Can Do It! Program".

All homeroom and classroom teachers may refer students to the College's Head of Welfare, the Chaplain or the Director of Primary Learning for additional pastoral care. Weekly e-newsletters are sent home by either the class teacher to keep families in touch with coming events and where outstanding achievements can be noted and celebrated.

In both the Primary and Secondary schools, classroom teachers are available for communication with parents in order to support the student and to build strong connections

between home and the College. At times where students or parents are not happy with the pastoral support pathways for student complaint or grievances are outlined in the Grievance and Complaint Management Policy.

2.6 Confidentiality

Disclosing information to staff, directors, volunteers and contractors

When children are having a written or verbal interaction with staff, directors, volunteers and/or contractors of the College, that interaction is confidential to the organisation not to the individual. This means that a staff member, director, volunteer or contractor is able to talk to the Principal in a way that identifies the child. The guiding principle is, that where possible, the privacy of the child should be respected at all times. When considering breaching their privacy who and how many people are told should be based on what is believed to be in the best interests of the child.

Disclosing information to people external to the organisation

Staff, directors, volunteers and contractors should not discuss confidential matters about children with people outside the organisation in a way that identifies that child except when they have the express permission of the child or it complies with the College's Child Safety Policy, Code of Conduct and Procedure. In circumstances where staff, directors, volunteers and/or contractors believe that there is not enough knowledge within the organisation to provide the best possible assistance to a child, they are able to seek expertise external to the College. When communicating with people outside the College the child's identity should be protected.

Informing children

It is the responsibility of the College to communicate the limits of confidentiality in the College to children who are likely to have an ongoing relationship with the College. These guidelines should be published in an accessible place for children.

3 CHILD SAFETY PROCEDURE

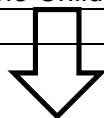
This Procedure applies to all employees, directors, volunteers and contractors of the College, whether they work face-to-face, online or remotely with children. It should be read in accordance with the Child Safety Policy and Code of Conduct.

Step 1:

When a “Mandatory Reporter” forms a belief, on reasonable grounds, that a child is in need of protection because they have suffered, or are likely to suffer, significant harm due to physical injury or sexual abuse, they must make a report to the Department of Health and Human Services (“**DHHS**”) as soon as practicable.

The individual employee, director, volunteer, contractor of the College should discuss these observations and concerns with the Child Protection Worker/s and/or the Principal, who can assist the person to make the report to DHHS as required.

Any person that forms a belief on reasonable grounds that a child is in need of protection from child abuse (physical, sexual, emotional, psychological or neglect), **may** disclose that information to the Police or the DHHS. The College encourages all persons with concerns to raise this directly with the Child Protection Worker.



Step 2:

It may be that, following the previous step, a person decides to make a report to DHHS with the support of the Child Protection Worker/s and/or the Principal.

Making a report:

Ring DHHS at the North Division Intake on 1300 664 977. Ask for Child Protection.

Information for making a report:

- name, age and address of student;
- the reason for suspecting that the behaviour or injury is a result of abuse;
- an assessment of the immediate danger to the student;
- a description of the injury or behaviour observed;
- the current whereabouts of the student;
- any other information about the family; and
- any specific cultural details, e.g. English speaking, disability, etc.

Ask that the College be informed of each step of the procedure.

Request that if an interview is to take place at the College the visiting police officers are in plain clothes and the time of the interview is specified so that appropriate arrangements for a meeting room can be organized.

When the person informs the Child Protection Worker that he/she is to make/has made

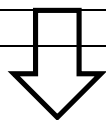
a report, a Case Management Group that may consist of the Child Protection Workers will be set up to discuss the matter and to offer support to the student and reporter.

If the complainant alleges that a crime has been committed by an employee, director, volunteer or contractor, that person will be stood down, pending investigation) immediately.

The Principal will conduct an independent investigation into the allegation to the extent that it will not interfere with investigations by DHHS or the police, and will co-operate with the authorities as required.

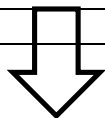
Where an allegation has been made, the College will make, secure, and retain records of the allegation of child abuse and the College's response to it.

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



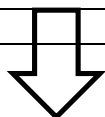
Step 3:

If the student is agreeable to be interviewed by DHHS or the police, the Head of Welfare and/or Chaplain should be present at the interview to give support to the student.



Step 4:

Following a report, DHHS may need to contact the Principal about the notification. It would be a matter of courtesy to inform the Principal that a report has been made, or is about to be made.



Step 5:

Following a report, it is important to protect confidentiality and the interests of the child and family at all times.

Special comments:

- DHHS will only interview the student if he/she is agreeable;
- the family will not be contacted until it is believed there is a case and the student is at risk;
- if the incident which caused the report to be made has occurred in the past - the student may be seen to be no longer at risk and no further action may be taken;
- the identity of the person making a notification will be kept confidential (except when that information is required in a court case) unless that person gives permission for the information to be divulged.

- throughout the entire process of observation, discussion and reporting, the interests of the student and their family should be protected from unnecessary disclosure of information concerning abuse; and
- following the making of a report to the DHHS, any investigation that takes place is the responsibility of DHHS.

Attachment A - Child Welfare Reporting Record

Students Name		
Date of Birth and Age		
Year Level		
Staff Member's description of the injury, observed behaviour or disclosure		
What gives you reasonable grounds for believing that the injury, observed behaviour or disclosure is the result of child abuse or neglect and if so, by whom? (add more pages if required, attach any written evidence and include quotes from the student if applicable)		
What actions have been taken to date about this matter?		
Date of DHS Notification		
Name of Child Protection Intake Worker		
Response or Recommendation from Child Protection Worker		
Action taken by the College		
Name of Staff Member Who Made Notification	Signature of Staff Member Who Made Notification	
Today's Date		

This form must be passed on to the Head of Welfare, Chaplain and/or Principal immediately

Appendix B

BETRAYAL OF TRUST: FACTSHEET

The new 'grooming' offence

The *Crimes Amendment (Grooming) Act 2014*, which commenced in Victoria on 9 April 2014, introduces the offence of Grooming for sexual conduct with a child under the age of 16 years. This offence targets predatory conduct designed to facilitate later sexual activity with a child.

The Betrayal of Trust report recommended the grooming offence, given the way in which many sex offenders target their victims. Grooming can be conducted in person or online, for example via interaction through social media, web forums and emails.

Many perpetrators of sexual offences against children purposely create relationships with victims, their families or carers in order to create a situation where abuse could occur. For this reason, parents, carers or other family members who have been targeted by perpetrators in order to gain access to a child are also victims.

The *Victim's Charter Act 2006* was amended to expressly provide that a child and a family member of that child are victims of a grooming offence and are entitled to provide a victim impact statement to a court.

GROOMING IS NOW A CRIMINAL OFFENCE

1. What is grooming?

- The offence of grooming concerns predatory conduct undertaken to prepare a child for sexual activity at a later time.
- The offence applies where an adult communicates, by words or conduct, with a child under the age of 16 years or with a person who has care, supervision or authority for the child with the intention of facilitating the child's involvement in sexual conduct, either with the groomer or another adult.
- Grooming does not necessarily involve any sexual activity or even discussion of sexual activity – for example, it may only involve establishing a relationship with the child, parent or carer for the purpose of facilitating sexual activity at a later time.
- The sexual conduct must constitute an indictable sexual offence. This includes offences such as sexual penetration of a child, indecent assault and indecent act in the presence of a child. It does not include summary offences, such as upskirting and indecent behaviour in public.

2. Who can commit the offence?

The offence can be committed by any person aged 18 years or over. It does not apply to communication between people who are both under 18 years of age.

3. What age are the children who are protected by the offence?

The offence applies to communication with children under 16 years, but not communication with 16 and 17 year old children. This distinction between children aged below 16 and those aged 16 or 17 reflects the general age of consent (16 years) recognised by the criminal law in relation to sexual offences.

BETRAYAL OF TRUST: FACTSHEET

4. What are the key differences between the Victorian grooming offence and the grooming offences that have been implemented in New South Wales and by the Commonwealth?

The New South Wales grooming offence is confined to circumstances in which an adult engages in conduct that exposes a child to indecent material or provides the child with an intoxicating substance with the intention of making it easier to procure the child for sexual activity. The Victorian offence is broader than this and prohibits an adult from engaging in any form of communication with the intention of facilitating sexual conduct. This is not limited to exposing the child to indecent material or providing them with an intoxicating substance and may include such acts as inappropriately giving them gifts or favours with the intention of engaging in later sexual activity.

The offence is similar to the Commonwealth grooming offence. The key distinction is that the Commonwealth offence is limited to grooming via a communication transmitted through a carriage service. The Victorian offence applies to any form of communication between the adult and child, including communication that occurs in person.

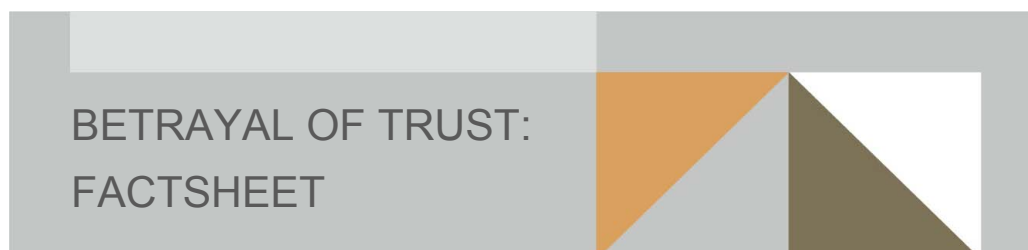
5. What is the purpose of amending the *Victim's Charter Act 2006*?

Amending the *Victim's Charter Act 2006* to expressly include a family member of the child as a victim of a grooming offence (eg. the child's parents) entitles the parents, or another family member, to provide a victim impact statement to the court.

6. What is the penalty for grooming?

The maximum penalty is 10 years imprisonment.

Appendix C



The new 'failure to protect' offence

Failure to protect a child from abuse – organisations

A new criminal offence has been created in Victoria for failing to protect a child under the age of 16 from criminal sexual abuse. The offence will apply where there is a substantial risk that a child under the care, supervision or authority of an organisation will become a victim of a sexual offence by an adult associated with that organisation. The person in a position of authority will be guilty if they knew of the risk of abuse and had the authority to reduce or remove the risk, but negligently failed to do so.

1. What is the offence of failing to protect a child from sexual abuse?

If a person in authority knows that someone within their organisation poses a risk of committing a sexual offence against a child and they fail to remove that person who poses the risk, they will themselves be guilty of a criminal offence.

As soon as a person in authority becomes aware of a risk of child sexual abuse, they will be under a duty to take steps to remove or reduce that risk.

2. Will this criminalise mistakes made by organisations who are working to protect children?

An individual who falls short of the standard of care that a reasonable person would exercise in the circumstances will be found guilty of the offence.

For example, a person in authority who knows someone poses a risk to children and moves them from one location in an organisation to another location where they still have contact with children would be committing an offence.

It will not apply where a person takes reasonable steps to protect a child from the risk of abuse, for example, where the allegation is reported and the person removed from any child-related role pending an investigation.

3. Will the offence criminalise individuals who fail to protect a child from abuse, for example, a non-offending parent?

No. The failure to protect offence is limited to people in positions of authority within organisations that exercise care, supervision or authority over children. This includes churches, schools, child-care centres and residential care homes. It does not apply to parents or other individuals.

The separate offence, the new failure to disclose offence, will apply to any individual with information about the criminal abuse of a child who fails to report their knowledge to police.

4. What is the penalty for failing to protect a child?

The maximum penalty is five years' imprisonment.

5. When will the failure to protect offence take effect?

This offence will commence by 1 July 2015 but may come into effect sooner.

Appendix D

BETRAYAL OF TRUST: FACTSHEET

The new 'failure to disclose' offence

Reporting child sexual abuse is a community-wide responsibility. Accordingly, a new criminal offence has been created in Victoria that imposes a clear legal duty upon all adults to report information about child sexual abuse to police.

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.

1. What is a 'reasonable belief'?

A 'reasonable belief' is not the same as having proof. A 'reasonable belief' is formed if a reasonable person in the same position would have formed the belief on the same grounds.

For example, a 'reasonable belief' might be formed when:

- a child states that they have been sexually abused
- a child states that they know someone who has been sexually abused (sometimes the child may be talking about themselves)
- someone who knows a child states that the child has been sexually abused
- professional observations of the child's behaviour or development leads a professional to form a belief that the child has been sexually abused
- signs of sexual abuse leads to a belief that the child has been sexually abused.

2. Are there any excuses for not reporting child sexual abuse to police?

A person will not be guilty of the offence if he or she has a **reasonable excuse** for not disclosing the information. A reasonable excuse includes:

- fear for safety
- where the information has already been disclosed.

➤ Fear for safety

A reasonable excuse exists in cases where a person has a reasonable fear for their own safety or the safety of another person (such as a child or another family member) and they do not report to police due to those circumstances.

This defence may apply, for example, if a mother decides not to disclose information about her partner sexually abusing her child due to fear of violence to her or her child.

The person's fear must be subjectively reasonable, that is, it must be reasonable from the perspective of that person in those circumstances. This recognises that the person in question is best placed to judge whether their safety is in danger.

The court or jury will consider whether it was reasonable for the person not to report in the circumstances.

➤ Where the information has already been disclosed

It is a reasonable excuse to not disclose where a person believes on reasonable grounds that the information has already been disclosed to police and they have no further information to add.

BETRAYAL OF TRUST: FACTSHEET

An important example of this exception is where the person has already made a report under the mandatory reporting obligation specified in the *Children, Youth and Families Act 2005*. This obligation requires teachers, doctors and other professionals to report concerns about child welfare to child protection authorities within the Department of Human Services (DHS).

Under the existing mandatory reporting system, DHS already passes on all allegations of child sexual abuse to police, so it will be a reasonable excuse for not reporting to police if a person has made a report to DHS or reasonably believes a report has been made to DHS. This ensures that people are not required to make multiple reports to different agencies.

3. What is not a reasonable excuse?

A person does not have a reasonable excuse for failing to disclose sexual abuse if they are only concerned for the perceived interests of the perpetrator or any organisation. 'Perceived interests' includes reputation, legal liability or financial status.

For example, a principal's concern for the reputation of a school, or a clergyman's concern for the reputation of a church where the abuse happened will not be regarded as a reasonable excuse.

4. Are there any other exemptions to the offence?

There are a number of other exemptions, which include:

- the victim requests confidentiality
- the person is a child when they formed a reasonable belief
- the information would be privileged
- the information is confidential communication
- the information is in the public domain
- where police officers are acting in the course of their duty.

➤ The victim requests confidentiality

The new offence respects the position of a victim who does not want the offending disclosed and who is sufficiently mature to make that judgment. The obligation to report therefore does not apply where the information comes from a person aged 16 or over and this person requests that the offence not be reported. The law recognises that a child under 16 is not able to make this kind of decision and sometimes lacks the capacity to fully understand the effects of sexual abuse.

A person will still be required to disclose information to police if:

- the victim who requested confidentiality has an intellectual disability, and
- the victim does not have the capacity to make an informed decision about a disclosure, and
- the person who received the information is aware or should be reasonably aware of those facts.

➤ The person is a child when they formed a reasonable belief

If a person was under the age of 18 when they formed a reasonable belief, they will not be obliged to make a disclosure when they turn 18. This protects children from the burden of knowing that they will have to disclose to police when they turn 18.

➤ The information would be privileged

People will not be required to disclose where the information would be privileged. This includes:

BETRAYAL OF TRUST: FACTSHEET

- client legal privilege
- journalist privilege
- religious confessions.

For example, if a priest obtains information made in good faith through a rite of confession (as long as the admission is not given for a criminal purpose), the priest is exempt from disclosing.

➤ The information is confidential communication

A registered medical practitioner or counsellor is not required to disclose information to police if the information is obtained from a child whilst providing treatment and assistance to that child in relation to sexual abuse. However, under the mandatory reporting obligations, a registered medical practitioner would still be required to report to DHS if they form a reasonable belief that a child has been sexually abused and is in need of protection. This exemption is not designed to prevent the reporting of child sexual abuse, but rather to protect the registered medical practitioner or counsellor from criminal liability.

If an adult provides information to a medical practitioner or counsellor regarding the sexual abuse of a child, the medical practitioner or counsellor would be required to disclose that information to police unless another exemption applies.

➤ The information is in the public domain

A person does not have to disclose to police if they get the information through the public domain, or form the belief solely from information in the public domain such as television or radio reports.

➤ Where police officers are acting in the course of their duties

A police officer acting in the course of their duty in respect of a victim of child sexual abuse is exempt from the offence.

5. If it is going to be compulsory for everyone to report child sexual abuse, why are there exemptions?

We need to ensure that in creating this legal obligation, we do not put children and their families at even greater risk of harm, especially those who may be experiencing family violence.

6. Won't child sexual abuse continue to occur if exemptions are allowed?

There is currently no requirement for people to report child sexual abuse to police, so introducing this new legal obligation is a big step towards preventing child sexual abuse in our community and ensuring people understand that it is a community-wide responsibility.

Certain exemptions are required to avoid any unintended consequences of this new obligation. It is not intended, for example, that this offence criminalise victims of family violence who don't report due to fear for their own or someone else's safety.

For example, women in family violence situations may have a reasonable fear for the safety of their child or another family member, especially in cases where threats have already been made. They may fear that making a report to police will escalate the situation, putting their child or another family member at even greater risk of harm – or even death.

Preventing the sexual abuse of children is a community responsibility. Other people connected with the child will still be required to make a report, unless they have a reasonable excuse not to do so.

BETRAYAL OF TRUST: FACTSHEET

7. Won't this offence discourage people from seeking help where they have experienced child sexual abuse?

The law will not require a medical practitioner or counsellor to disclose information to police when it has been obtained from a victim during treatment for sexual abuse.

Disclosures for the purpose of obtaining legal advice will also be protected by client legal privilege. There are also other exemptions which have been listed above.

8. The offence requires 'any adult' to report suspected child sexual abuse. Isn't this too broad? Won't it lead to people reporting unfounded suspicions?

The offence requires a person to report to police where they have information that leads them to form a 'reasonable belief' that a sexual offence has been committed against a child under 16. Under the offence, people will not be expected to disclose unfounded suspicions as a suspicion does not constitute a 'reasonable belief'.

The failure to disclose offence is a big step towards preventing child sexual abuse in our community and ensuring people understand that protecting children and preventing sexual abuse is a community-wide responsibility.

9. How will I be protected if I make a disclosure to police?

Your identity will remain confidential unless:

- you disclose it yourself or you consent in writing to your identity being disclosed
- a court or tribunal decides that it is necessary in the interests of justice for your identity to be disclosed.

10. Will any person who knows of child sexual abuse happening in the past be required to report?

A person who knows of child sexual abuse having occurred in the past will not have to report to police unless the victim is still a child when the offence comes into effect.

11. What is the penalty for failing to disclose child sexual abuse?

The maximum penalty is three years imprisonment.

12. When will the failure to disclose offence take effect?

27 October 2014.

13. How do I contact Victoria Police to make a report?

If you want to report a child in immediate risk or danger of sexual abuse please call [Triple Zero \(000\)](tel:000). Alternatively, you can [contact your local police station](#).

If you or someone you know has experienced child sexual abuse in an institutional context, we encourage you to contact Victoria Police's Sano Taskforce via email at sanotaskforce@police.vic.gov.au