

# Bendigo Kangan Institute

## PROCEDURE

### Child Safety Procedure

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#### 1.0 Purpose

The purpose of this procedure is to outline the processes in place to identify, respond to, report, and support the safety and wellbeing of *children and young people* at Bendigo Kangan Institute (BKI). This procedure should be read in conjunction with the Child Safety Policy.

#### 2.0 Scope

This procedure applies to all *employees* in exercising their duty of care to children, including supporting any person reporting child abuse concerns, i.e., students, visitors, parents, or carers, volunteers, and contractors. This includes mandatory reporters and other legal reporting obligations as defined in the Child Safety Policy.

#### 3.0 Policy References

- Child Safety Policy
- Health, Safety Wellbeing Policy
- Student Critical Incident Procedure
- Emergency Response Procedures Manuals (campus specific)
- Crisis Management Plan
- Employee Code of Conduct Policy
- Managing Employee Performance and Conduct Procedure
- Employee Disciplinary Procedure
- Improper Conduct Policy and Procedure and Investigation Procedure
- Incident and Non-Conformance Reporting and Investigation Procedure

#### 4.0 Procedural Steps

The following procedural steps are followed for each incident, disclosure or suspected child abuse or risk of child abuse. We all play a critical role in protecting children in our care and are required to ensure the [FOUR CRITICAL ACTIONS for VET & Higher Education Providers](#) are followed.

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No.	Phases and steps	Role Who Actions
4.1	Identifying Child Abuse Incidents or Suspicions	
4.1.1	<p>Identifying child abuse may involve witnessing an incident, receiving a disclosure, or forming a <i>reasonable belief</i> that a child has, or is at risk of being abused. This may be formed through observations, sudden changes in behaviour, decline or limited growth and development.</p> <p>Child abuse includes physical abuse and sexual abuse (including <a href="#">Grooming</a>), emotional/psychological abuse and neglect. The following poses risks to children, and is not exhaustive:</p> <ul style="list-style-type: none"> <li>• Grooming is behaviour committed by an adult either directly or online towards a child or an adult caring for them with intent to sexually abuse the child. Grooming is a criminal offence.</li> <li>• Risks to an unborn child to due to domestic violence or risk- taking behaviours, such as alcohol or drug abuse.</li> <li>• Students under the age of 18 presenting with self-harming, suicide ideation, and recent/ or suicide attempts.</li> <li>• Sexual offending committed by a child over 10 years old.</li> </ul>	Employees
4.1.2	<p>Child abuse may also involve when a child is <i>in need of protection</i>. Any person may believe on reasonable grounds that a child is in need of protection for any of the following reasons:</p> <ul style="list-style-type: none"> <li>• The child has been abandoned and there is no other suitable person who is willing and able to care for the child.</li> <li>• The child's parents are dead or incapacitated and there is no other suitable person who is willing and able to care for the child.</li> <li>• The child has suffered or is likely to suffer significant harm due to physical injury and the parents are unable or unwilling to protect the child.</li> <li>• The child has suffered or is likely to suffer significant harm because of sexual abuse and their parents are unable or unwilling to protect the child.</li> <li>• The child has suffered or is likely to suffer emotional or psychological harm and the parents are unable or unwilling to protect the child.</li> <li>• The child's physical development or health has been or is likely to be significantly harmed and the parents are unable or unwilling to provide basic care, or effective medical or other remedial care.</li> <li>• Youth Pregnancy, refer to <a href="#">BT or KI Managing Student Issues – A Teacher Reference Guide</a></li> </ul>	Employees
4.1.3	Certain behaviours displayed by an adult associated with BKI against or in the presence of a child may fall under the <i>Reportable Conduct Scheme</i> and constitute both child abuse and <i>Reportable Conduct</i> .	Employees
4.1.4	<p><b>Secondary Consult</b></p> <p>When making a decision whether to report externally and/or what support to provide, or particularly when uncertain, consult with your manager and Child Safety Officer (CSO) or secondary contact see <a href="#">Child Safe Toolkit</a>.</p>	Employees

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4.1.5	<p><b>Recommendation to Report</b></p> <p>If after consultation a recommendation is made to report to authorities, this must be actioned, and a child safety incident completed.</p> <p>If you are unable to action the recommendation you must supply in writing, email suffice, to your line manager, a request they report on your behalf.</p> <p>Line Managers can request the CSO or secondary contact to assist with reporting as required.</p>	Employees
4.2	Reporting Incidents, Disclosures and Suspicions of Child Abuse	
4.2.1	<p>Follow the <a href="#">FOUR CRITICAL ACTIONS for VET &amp; Higher Education Providers</a>: Responding to Incident, Disclosures and Suspicion of Child Abuse, available in <a href="#">Child Safe Toolkit</a> Posters displayed on campuses.</p> <p><b>Critical Action 1: Respond to an Emergency</b></p> <p>If a child is at immediate risk of harm, you must ensure their safety by:</p> <ul style="list-style-type: none"> <li>• Separating alleged victims and others involved.</li> <li>• Administering First Aid.</li> <li>• Calling 000 for urgent medical and/or police assistance to respond to immediate health or safety concerns.</li> <li>• Identifying a contact person for future liaison with Police.</li> </ul> <p>Where necessary you may need to maintain the integrity of the potential crime scene and preserve the evidence.</p>	Employees
4.2.1	<p>Follow the <a href="#">FOUR CRITICAL ACTIONS for VET &amp; Higher Education Providers</a>: Responding to Incident, Disclosures and Suspicion of Child Abuse, available in <a href="#">Child Safe Toolkit</a> Posters displayed on campuses.</p> <p><b>Critical Action 1: Respond to an Emergency</b></p> <p>If a child is at immediate risk of harm, you must ensure their safety by:</p> <ul style="list-style-type: none"> <li>• Separating alleged victims and others involved.</li> <li>• Administering First Aid.</li> <li>• Calling 000 for urgent medical and/or police assistance to respond to immediate health or safety concerns.</li> <li>• Identifying a contact person for future liaison with Police.</li> <li>• Where necessary you may need to maintain the integrity of the potential crime scene and preserve the evidence.</li> </ul>	Employees
4.2.2	<p><b>Critical Action 2: Reporting to Authorities</b></p> <p>As soon as immediate health and safety concerns are addressed you must report all incidents, suspicions, and disclosures of child abuse as soon as possible. Failure to report physical and sexual child abuse may amount to a criminal offence.</p> <p>Source of abuse determine who you report to:</p> <p>1. Within BKI</p> <p>You must report all instances of suspected child abuse to Victoria Police.</p>	Employees

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	<p>You must also report internally to Child Safety Officer, if not available secondary contacts.</p> <p>2. Within the family or community:</p> <p>You must report to Department of Families, Fairness and Housing (DFFH) Child Protection if a child is:</p> <ul style="list-style-type: none"> <li>• In need of protection from child abuse.</li> <li>• At risk of being harmed (or has been harmed) and the harm has had or is likely to have a serious impact on the child's safety, stability, or development.</li> </ul> <p>You must also report all instances of suspected sexual abuse (including grooming) to Victoria Police.</p> <p>You must also report internally to Child Safety Officer, if not available secondary contacts.</p> <p>If you believe that a child is not subject to abuse, but you still hold significant concerns for their wellbeing you must still act. This may include making a referral or seeking advice from Child FIRST/The Orange Door, in circumstances where the family are open to receiving support, or to another <i>relevant agency</i>, or when unable to determine whether the family are open to receiving report, i.e., failing to or avoiding contact with the institute.</p>	
4.2.3	<p><b>Critical Action 3: Contacting Parents/Carers</b></p> <p>The relevant employees must consult with DFFH Child Protection or Victoria Police to determine what information can be shared with parents/carers. They may advise:</p> <p>Not to contact the parents/carers in circumstances where the parents are alleged to have engaged in the abuse, or the child is a <a href="#">mature minor</a> and does not wish for their parent/carer to be contacted.</p> <p>To contact the parents/carers and provide agreed information (this must be done as soon as possible, preferably on the same day of the incident, disclosure, or suspicion.</p>	<p>Educators or delegate</p> <p>Counsellors</p> <p>Child Safety Officer</p>
4.2.4	<p><b>Critical Action 4: Providing Ongoing Support</b></p> <p>BKI must provide support for children and young people impacted by abuse. Strategies may include development of a safety plan, direct support, and referral to wellbeing professionals.</p>	<p>Educators</p> <p>Counsellors</p> <p>Child Safety Officer</p>
4.2.5	<p>Use the <a href="#">FOUR CRITICAL ACTIONS for VET &amp; Higher Education Providers</a> every time you become aware of a further instance of risk or abuse. This includes reporting new information to authorities.</p> <p>The Child Safety Officer or secondary contacts can help you.</p> <p>Contacts are available in the <a href="#">Child Safe Toolkit</a>.</p>	<p>Employees</p>
4.3	<p>Incident Escalation</p>	

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4.3.1	Follow 5.0 <i>Reporting Structure Escalations and Timeframes</i> chart to ensure leadership aware of child safety incidents as required, ensuring Lead Educator and Education Manager for the program students enrolled are informed to manage <i>duty of care</i> requirements as required. A dual escalation pathway has been designed to ensure escalation.	Employees
4.4	Completing an Incident Report	
4.4.1	Employees must also complete the Child Safety (Incident) Report, in all instances of suspected, disclosed or incidents of child abuse, or risk of child abuse, or where employees are contacted by authorities investigating child abuse. The Child Safety (Incident) Report can be found in the <a href="#">Child Safe Toolkit</a>	Employees
4.4.2	The Child Safety (Incident) Report when completed must be submitted to the Child Safety Officer for follow up and record keeping by emailing to <a href="mailto:childsafety@kangan.edu.au">childsafety@kangan.edu.au</a>	Employees Child Safety Officer
4.4.3	Where an Incident, Hazard and or Near Miss is also detected then an Incident or Hazard Report should be raised in line with the Incident and Non-Conformance Reporting and Investigation Procedure.	Employees
4.5	Student Safety Support Plan	
4.5.1	Student Safety Support Plans may be required during Critical Action 4. These are prepared by an Educator or Counsellor where applicable in conjunction with the Child Safety Officer. A recommended template is available on the <a href="#">Child Safe Toolkit</a>  For privacy these plans do not detail the incident itself, instead the ongoing supports and risk mitigation strategies. They are shared with those listed on the plan as agreed by the child and/or the parent/carer.	Educators Counsellors
4.5.2	Once signed by the child and/or parent/carer email the plan to the child safety officer for recording. <a href="mailto:childsafety@kangan.edu.au">childsafety@kangan.edu.au</a>	Educators Counsellors
4.5.3	Where the child requires further support, Aboriginal or Torres Strait Islander ( <a href="#">Indigenous Education Centre</a> , Koori Liaison Officers and mentors, Metro and <a href="#">Regional</a> ), homeless, culturally or linguistically diverse (CALD), has a disability and/or is sexual and/or gender diverse, contact student support <a href="#">Metro Regional</a> , for counselling and welfare support.	Employees
4.6	Incident Review Report	
4.6.1	Education Directors, Heads of areas or equivalent may sanction an incident review to promote significant learnings and the purpose of a review is for continuous improvement practice. Any person party to the incident can request a review via their line manager or the CSO. A template for reviews is available on the <a href="#">Child Safe Toolkit</a>	Education Directors
4.7	Recordkeeping	
4.7.1	All records relating to child abuse, or risk of child abuse must be securely stored for a <a href="#">minimum of 45 years</a> , or for as long as they are reasonably likely to be needed, whichever is greater.	Head of Student Services

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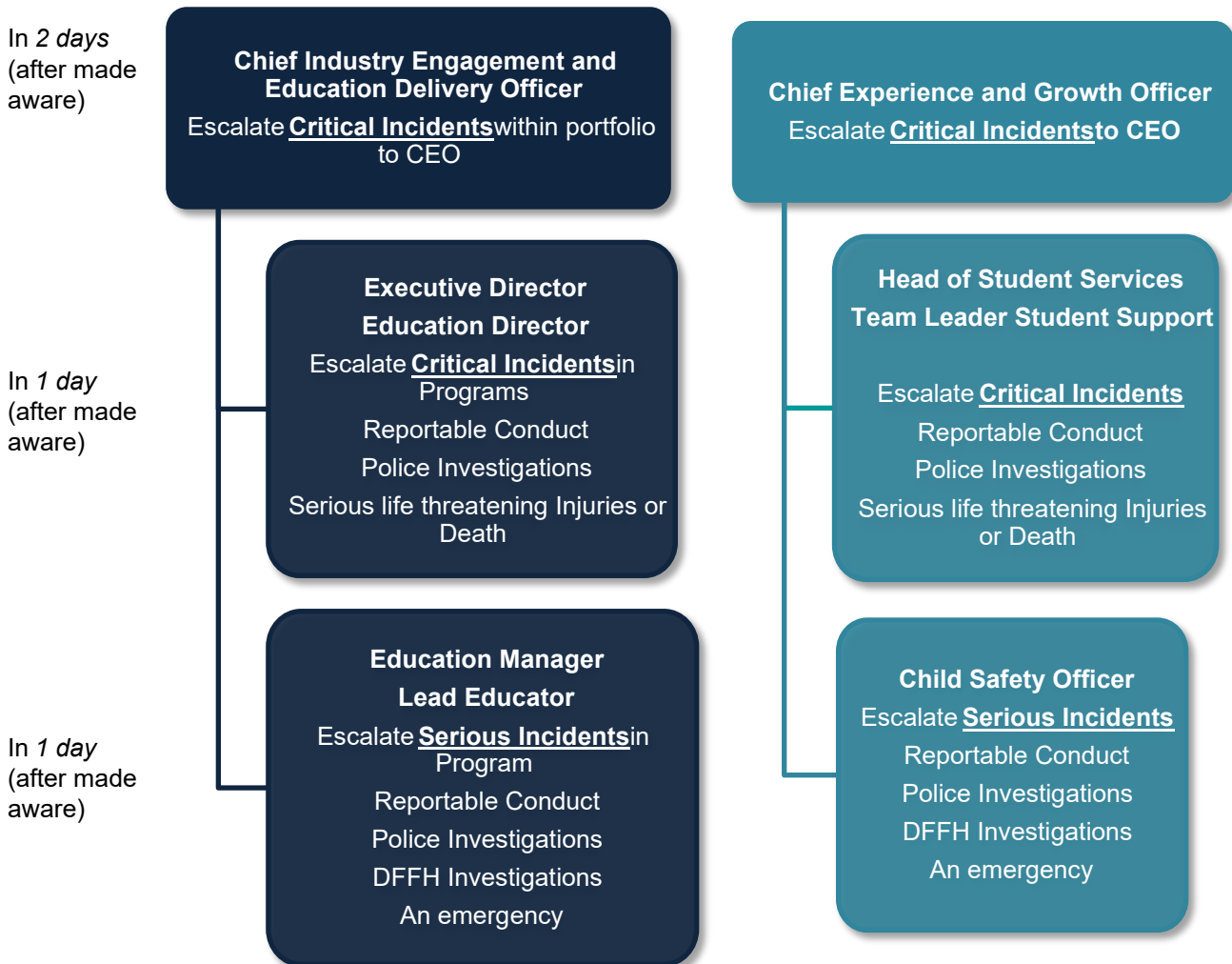
4.7.2	Currently, all details are confidentially secured on Client Management System (CMS) and Student Support Services secure, V Drive (post 28 October 2022 Secure Child Safety Share Point page).	Head of Student Services Chief Information Officer
4.7.3	Child Safety Incidents are monitored by the Child Safety Officer in liaison with relevant parties until resolution reached.  This is determined on a case-by-case basis; child's age, vulnerabilities, presentation; level of parental support; current risks, mitigations in place; external investigations status.	Child Safety Officer  Team Leader Student Support
4.7.4	Status of Child Safety incidents are reported to leadership quarterly per <i>Governance, Leadership and Reporting Schedule</i> . Resolutions recorded in a de-identified format.	Head of Student Services
4.7.5	All records must be treated confidentially and secured in BKI approved and password protected systems.	Employees Chief Information Officer
4.8	Reportable Conduct	
4.8.1	Reportable Conduct must be reported to the following authorities: <ul style="list-style-type: none"> <li>• <i>Commission for Children and Young People CCYP</i> within <b>3 business days</b> of becoming aware <a href="#">here</a>.</li> <li>• Victoria Police (per <b>Critical Action 2</b> above)</li> </ul> Police investigations take precedence and may delay a workplace investigation.	Head of Student Services
4.8.2	Oversee and appoint an internal workplace investigator and/or external investigator to investigate the matter as required.	Head of Health, Safety and Wellbeing
4.8.3	A result of the investigation or update must be provided to the CCYP within <b>30 calendar days</b> of the report to CCYP <a href="#">here</a> .	Assigned Investigator(s)
4.8.4	The Child Safety Officer role is to promote the voice of children or young people impacted and make recommendations regarding strategies to prioritise the safety of children. Monitor to resolution.	Child Safety Officer
4.8.5	Wellbeing and communication with the subject of an allegation is the responsibility a Senior Manager of the subject's work area in consultation with the assigned investigator.	Senior Manager Assigned Investigator
4.8.6	Communication as deemed appropriate occurs with Head of Health, Safety and Wellbeing, Head of People Operations, Head of Student Services, Head of Risk and Compliance, Head of Procurement.	Assigned Investigator
4.8.7	Refer to <i>Reportable Conduct Investigations Process Chart</i> for further <a href="#">Child Safe Toolkit</a>	Head of Student Services

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5.0 Reporting Structure Escalations and Timeframes

**Timeframes  
Child Safety  
Authorities Reporting  
Internal and External**

CEO ensure systems in place for Escalations and Reportable Conduct is reported to Commission for Children and Young People



Same day from a reasonable belief a child has been abused, or at risk of abuse and/or is in need of protection. Follow [FOUR CRITICAL ACTIONS for VET & Higher Education Provides](#)

**All Employees**  
Escalate to Lead Educator/ Education Manager AND Child Safety Officer or secondary contact



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### 6.0 Roles and Responsibilities

Role	Responsibilities
Chief Executive Officer (CEO)	Oversee compliance with the <i>Reportable Conduct Scheme</i> as set out by the <i>Commission for Children and Young People</i> .
Chief Industry Engagement and Education Delivery	Oversee child safety procedure within the portfolio. Escalate to CEO Critical Incidents reported within a portfolio.
Education Delivery Executive Directors/ Directors	Oversee child safety procedure within programs. Escalate Critical Incidents.
Education Managers	Ensure child safety procedure is communicated and followed within programs. Escalate Serious Incidents.
Lead Educators	Ensure child safety procedure is communicated and followed within programs. Escalate Serious Incidents.
Chief Experience and Growth	Oversee Child Safe Standards framework. Escalate to CEO Critical Incidents reported within portfolio.
Head of Student Services	Escalate Serious Incidents. Ensure compliance, initial reporting to CCYP, oversee volunteer Reportable Conduct matters.
Team Leader Student Support	Escalate Serious Incidents to Head of Student Services. Manage record keeping systems.
Child Safety Officer	Escalate Serious Incidents to Team Leader, recording and follow-up of child safety incidents to resolution.
Chief Information Officer	Ensure ICT systems safe and protected.
Head of People Operations	Ensure employee misconduct investigation processes.
Head of Health Safety and Wellbeing	Ensure incident reporting hazard and near miss investigation processes. Oversee and engage investigators.
Chief Operating Officer	Ensure supplier misconduct investigations processes.
Head of Governance Risk and Compliance	Ensure improper conduct investigation processes.
Investigators	Investigate, compile investigation reports, liaise with stakeholders internal and external as required.
Senior Managers	Ensure subject to reportable conduct within the program are appropriately supported during an investigation process.
Line Managers	Ensure that reporting and the child safety procedure communicated and followed for the program area.



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Employees	Follow the child safety procedure, escalate incidents requiring reporting to Child Safety Officer and where appropriate the Lead Educator or Education Manager (program student enrolled).
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### 7.0 Definitions

Word/Term	Definition
Child or Young Person	Anyone under the age of 18.
Employees	Includes employees whether full, part-time, casual and/or sessional, volunteers and contractors aged 18 and above.
Reasonable belief	<p>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, formed when:</p> <ul style="list-style-type: none"> <li>• A child states that they have been abused.</li> <li>• A child states that they know someone who has been abused (sometimes the child may be talking about themselves).</li> <li>• Someone who knows a child states that the child has been abused.</li> <li>• Professional observations of the child's behaviour or development leads a mandated professional to form the belief.</li> <li>• Signs or indicators of abuse leads to a belief the child has been abused or at risk of abuse.</li> </ul>
Reportable Conduct Scheme	Reportable Conduct Scheme ensures people who are not safe to work with children do not continue to work with children as overseen by the Commission for Children and Young People, for further see <a href="#">here</a> .
Reportable Conduct	<p>This includes allegations against employees, contractors or volunteers of child abuse and misconduct involving children such as:</p> <ul style="list-style-type: none"> <li>• Sexual offences committed against, with or in the presence of a child.</li> <li>• Sexual misconduct committed against, with or in the presence of a child.</li> <li>• Physical violence against, with or in the presence of a child.</li> <li>• Any behaviour that causes significant emotional or psychological harm to a child.</li> <li>• Significant neglect of a child.</li> </ul> <p>Allegations must be reported even if:</p> <ul style="list-style-type: none"> <li>• The worker or volunteer does not have direct contact with children as part of their work.</li> <li>• The conduct occurred within or outside the course of employment.</li> </ul>
Relevant Agency	<p>This may include DFFH Child Protection and/or Victoria Police or specialised Sexual Offences and Child Abuse Investigative Teams (SOCIT)</p> <p>Wellbeing concerns may be reported to community and family support agencies such as The Orange Door. Seek advice from Child Safety Officer or secondary contacts in the <a href="#">Child Safe Toolkit</a></p>

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Duty of Care	All employees have a legislative duty of care to protect the safety, health and wellbeing of children in their care.
Incident Escalation	Incidents are escalated based on several factors per the <i>Reporting Structure Escalations and Timeframes</i> to ensure governance compliance.

### 8.0 Related Documents

Title	Location
Bendigo TAFE and Kangan Institute Child Safety Information Booklet	<a href="#">Child Safe Toolkit</a>
Child Safety (Incident) Report (template)	<a href="#">Child Safe Toolkit</a>
Child Safety Policy	<a href="#">Child Safe Toolkit</a>
Child Safe Standards Risk Assessment	<a href="#">Child Safe Toolkit</a>
Four Critical Actions for VET & Higher Education providers	<a href="#">Child Safe Toolkit</a>
Governance, Leadership and Reporting Schedule	<a href="#">Child Safe Toolkit</a>
Incident Review Report (template)	<a href="#">Child Safe Toolkit</a>
Student Support Managing Student Issues – A teachers guide	<a href="#">Intranet</a>
Reportable Conduct Investigations Process Chart	<a href="#">Child Safe Toolkit</a>
Student Safety Support Plan (template)	<a href="#">Child Safe Toolkit</a>
Reporting Obligations Summary Table	<a href="#">Child Safe Toolkit</a>

### 9.0 Version Control and Change History

Ver.	Approved By	Approval Date	Issue Date	Summary of Changes	Next Review Date
1.0	Board of Studies	28/08/2019	28/08/2019	New and updated procedure incorporating the former <i>Mandatory Reporting of Suspected Child Abuse</i>	28/02/2023

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2.0	CEGO	19/08/2021	20/08/2021	Update changes to references, structure, escalations, templates, legislation, definitions, <i>Mandatory Reporting Procedure</i> retired, define Reportable Conduct Investigation roles and responsibilities.	01/09/2022
2.1	Head of Governance, Risk and Compliance	02/11/2022	02/11/2022	12-month review, youth pregnancy, teachers guide, secondary consult, actions on recommendations.	02/09/2024