



Child Protection Policy

St Mark's Coptic Orthodox College

Introduction

St Mark's Coptic Orthodox College is committed to fulfilling its duty of care to all its students by:

- providing them with a learning environment that is safe, supportive and caring;
- seeking to recognize promptly when any of its students are in need of protection;
- taking appropriate action to protect its students when the College or its staff becomes aware that its students are in need of protection.

Accordingly, reportable conduct, child abuse, grooming behaviour, misconduct, and breaches of child safe practices by any staff member, volunteer, contractor, or visitor will not be tolerated under any circumstances. The College expects all staff to honour the College's commitment in this Policy and to work with the College to achieve a safe learning environment.

The College is committed to complying with its obligations under the Children and Young Persons (Care and Protection) Act 1998 (NSW), the Children's Guardian Act 2019 (NSW), the Child Protection (Working with Children) Act 2012 (NSW), and the NSW Child Safe Standards.

The College recognises that there is a danger that its staff could be seriously affected by false, vexatious or misconceived allegations against them. The College is therefore also committed to investigating all allegations promptly and fairly.

Scope

This policy applies to:

- all staff;
- volunteers;
- contractors;
- external providers;
- governing body members;
- and any other persons engaged in child-related work or activities involving students at the College.

This policy applies to conduct occurring:

- on College grounds;
- during College activities;
- online;
- during excursions, camps, and co-curricular activities; and
- in any context connected to College operations.

Publication and Distribution

This Policy must be provided to all staff, volunteers, contractors, and child-related personnel during induction and made accessible through the College's policy management

systems at all times.

This policy must be given to:

- Any person who makes a reportable allegation; and
- Any person, being a member of the School community, who requests a copy

Creating a Safe Learning Environment

The College will implement child safe practices aligned with the National Principles for Child Safe Organisations and NSW Child Safe Standards. These will include educating all members of the School community about child protection issues.

- All Staff must become familiar with these strategies
- All reportable allegations must be taken seriously
- The strategies developed by the School must be monitored continuously and reviewed regularly
- The College must provide professional development to meet the needs of the staff in implementing this Policy

Child Safe Standards

The College is committed to implementing and maintaining practices consistent with the National Principles for Child Safe Organisations and the NSW Child Safe Standards.

The College recognises that child safety is a shared responsibility and is committed to:

- promoting the safety, welfare, and wellbeing of all students;
- fostering a culture of safety, inclusion, and respect;
- actively considering the voice of students in decisions affecting them;
- maintaining clear reporting and complaint procedures;
- appropriately managing risks to child safety in both physical and online environments;
- ensuring staff, volunteers, and contractors understand their child protection obligations;
- taking appropriate action where concerns regarding child safety arise.

Child safety considerations will form part of the College's governance, risk management, recruitment, training, and operational practices.

Staff Training and Induction

The College will provide child protection training on an annual basis for all staff, including as required for new staff, volunteers and contractors.

Training will include:

- mandatory reporting obligations;
- recognising indicators of abuse, neglect, grooming, and harm;

- reportable conduct obligations;
- professional boundaries and appropriate conduct;
- online safety and image-based abuse;
- the College's child protection procedures and reporting pathways.

Training will occur:

- during induction;
- at regular intervals determined by the College;
- whenever legislative or procedural changes occur.

Records of completed training will be maintained by the College.

Reporting Obligations

The St Mark's Coptic Orthodox College Head of College must:

- Promote this Policy within the School, with particular regard to the professional development needs of staff; and
- Monitor the strategies to create a safe learning environment.
- Ensure staff are informed at least annually of their mandatory reporting and reportable conduct obligations

Staff must:

- Understand and comply with mandatory reporting obligations, reportable conduct, and the College's child protection policy and procedures;
- Report promptly in accordance with this policy whenever they:
 - Reasonably suspect that a child or young person is at risk of significant harm;
 - Have become aware of a reportable allegation against a member of staff whenever the reportable conduct took place.

Mandatory Reporting

All mandatory reporters employed by the College must comply with their obligations under the Children and Young Persons (Care and Protection) Act 1998 (NSW).

A mandatory report must be made where a staff member has reasonable grounds to suspect that a child or young person is at risk of significant harm and those concerns arise during the course of their work.

Mandatory reporters may include:

- teachers;
- school counsellors;
- psychologists;
- welfare staff;
- senior leadership staff;
- and any other persons prescribed by legislation.

Concerns regarding risk of significant harm must be reported immediately through the

College's reporting procedures.

Staff must:

- document concerns promptly and accurately;
- notify the Head of College;
- make reports to the Department of Communities and Justice (DCJ) where legally required;
- comply with any direction provided by NSW Police, DCJ, or the Office of the Children's Guardian.

Nothing in this policy prevents a staff member from making a report directly to DCJ, NSW Police, or another relevant authority where required by law.

The College will support staff in fulfilling their mandatory reporting obligations and will not tolerate victimisation of any person who raises child protection concerns in good faith.

NESA Notification Obligations

The College will comply with its obligations under the Teacher Accreditation Act 2004 (NSW) and any applicable NESA requirements relating to the notification of teacher misconduct matters.

Where required, the College may notify the NSW Education Standards Authority (NESA) of matters that may affect a teacher's accreditation, professional standing, integrity, competence, or suitability to teach.

This may include circumstances where:

- a teacher is suspended, dismissed, or resigns during an investigation;
- a teacher is placed on alternate duties due to child safety concerns;
- the College becomes aware of criminal charges or convictions relevant to accreditation;
- findings of misconduct, reportable conduct, or serious breaches of professional standards are made.

The College may provide relevant records, investigation findings, correspondence, and other information required by NESA in accordance with applicable legislation and privacy obligations.

Pastoral Care

Any teaching member of staff who forms the belief on reasonable grounds that a child is in need of protection must make a mandatory report in accordance with the Children and Young Persons (Care and Protection) Act 1998 where they form reasonable grounds to suspect a child is at risk of significant harm.

Any member of staff to whom a reportable allegation is made or who becomes aware of

reportable allegation or conviction must immediately notify the Head of College and follow mandatory reporting procedures.

Any member of staff who has reported to, and following discussion with the St Mark's Coptic Orthodox College Head of College, is still concerned about a child's safety and continues to hold the belief that a child is in need of further protection, is legally obliged to make a report to the NSW Department of Communities and Justice (DCJ).

If a reportable allegation is made against the **Head of College**, the report must be made directly to the **Chair of the College Board**, who will fulfill the statutory obligations of the Head of Entity under the *Children's Guardian Act 2019* (NSW).

When the St Mark's Coptic Orthodox College Head of College receives a report from a member of staff under this section of this policy, they must take action including where necessary, making a notification to the Department of Communities and Justice (DCJ) and/or the Police.

The College will maintain documented child protection reporting procedures, internal escalation pathways, mandatory reporting guidance, and wellbeing referral systems.

The St Mark's Coptic Orthodox College Head of College must ensure that no person reporting under this section of this policy is disadvantaged as a result.

Student Voice and Complaints

The College encourages students to raise concerns regarding their safety, wellbeing, or the behaviour of others.

Students will be provided with age-appropriate information about:

- their right to feel safe;
- how to seek help;
- how to report concerns or complaints;
- available wellbeing and support services.

The College will:

- take student concerns seriously;
- respond to complaints promptly and appropriately;
- protect students from victimisation or retaliation;
- support students throughout complaint or investigation processes where appropriate.

Online Safety and Appropriate Use

The College recognises the importance of maintaining child safe practices in online environments.

Staff, students, volunteers, and contractors are expected to use technology appropriately and in accordance with College policies and applicable legislation.

The College prohibits:

- online grooming;
- cyberbullying;
- image-based abuse;
- possession or distribution of child abuse material;
- inappropriate electronic communications with students;
- the misuse of artificial intelligence or digital technologies to harass, exploit, manipulate, or harm others.

Concerns regarding online safety may be reported to relevant authorities, including NSW Police, the eSafety Commissioner, DCJ, or the Office of the Children's Guardian where appropriate.

Risk Management

Pending completion of any investigation (whether by the College or an external authority), the St Mark's Coptic Orthodox College Head of College may limit the contact the member of staff is to have with students or other staff, direct the member of staff to undertake duties other than normal duties or at different locations or suspend the member of staff (but on normal pay). Where applicable, matters will also be managed in accordance with the NSW Reportable Conduct Scheme and notification obligations to the Office of the Children's Guardian.

Before taking such action, the St Mark's Coptic Orthodox College Head of College must consider what risk, if any, the member of staff might pose to students. The St Mark's Coptic Orthodox College Head of College must take into account all relevant circumstances, including:

- The nature of the allegation;
- The vulnerability of the students (for example, because of their age);
- The nature of the position occupied by the member of staff;
- The extent to which the member of staff is supervised;
- The disciplinary record of the member of staff;
- The safety of the member of staff; and
- The extent to which the investigation could be compromised by the member of staff continuing his or her normal duties.

Any action taken by the St Mark's Coptic Orthodox College Head of College under this section of the policy is not an indication that the St Mark's Coptic Orthodox College Head of College has made, or is likely to make any particular findings in relation to the allegation against the member of staff.

Investigation

This section of the policy applies unless an investigation is being carried out by the NSW Police, the Department of Communities and Justice (DCJ), or the Office of the Children's Guardian. This section also applies to any investigation carried out by the College once an investigation carried out by an external authority has been completed.

The St Mark's Coptic Orthodox College Head of College must investigate or must cause to be investigated all reportable allegations.

The St Mark's Coptic Orthodox College Head of College must carry out all investigations in a way which affords procedural fairness to any member of staff involved. This means that, before completing an investigation of a reportable allegation, the St Mark's Coptic Orthodox College Head of College must inform the member of staff of the substance of the allegation against them and provide them with a reasonable opportunity to put their case forward (if required by the member of staff, with the assistance of a support person of the member of staff's choice). Normally the St Mark's Coptic Orthodox College Head of College is to decide the timing and the particular form this will take, ensuring the investigation is not compromised.

It also means that the St Mark's Coptic Orthodox College Head of College must:

- Act fairly and without bias;
- Conduct an investigation without undue delay;
- Ensure the case is not investigated or determined by someone with a conflict of interest;
- Ensure the outcomes are supported by evidence;
- Take steps to maintain confidentiality for the sake of all parties involved in the investigation
- At the conclusion of the investigation, the St Mark's Coptic Orthodox College Head of College may:
 - if the breach is minor, resulting from a misunderstanding of how certain words or behaviour were understood, require from the member of staff an apology and a commitment not to repeat the offence;
 - if it is more serious, require from the member of staff:
 - an undertaking to attend counselling;
 - a written apology;
 - a commitment not to offend again; and
 - In the most serious case, suspend or terminate the employment of the member of staff;

Where a student is in need of protection or the person to whom the reportable conduct has allegedly been directed, the St Mark's Coptic Orthodox College Head of College must as soon as possible advise the student's parents or caregivers unless the College reasonably believes doing so would place the child or another person at risk:

- Department of Communities and Justice (DCJ) intends to notify the student's parents or caregivers promptly;
- The school will breach its duty of care to the student or to other students by not advising the student's parents or caregivers.

The College must:

- make available its counselling staff to provide counselling and other support as required to:
 - any student who in need of protection or the person to whom reportable conduct has allegedly been directed; and
 - any member of staff against who a reportable allegation have made; and
 - where relevant, their families; and
- refer these people to external agencies able to provide relevant care and support.

Working With Children Check (WWCC)

The College will ensure that all staff, volunteers, contractors, and child-related personnel required by law to hold a Working With Children Check (WWCC) maintain a valid clearance at all times.

The College will:

- verify WWCC clearances before engagement or commencement;
- record and monitor WWCC details through an internal register;
- ensure WWCC clearances remain current;
- remove or restrict individuals from child-related work where required by law;
- comply with all obligations under the Child Protection (Working with Children) Act 2012 (NSW).

Failure to maintain a valid WWCC clearance may result in disciplinary action, including termination of employment or engagement.

Employment

The College must not employ a person in child-related employment without first requiring that person hold and maintain a valid Working With Children Check clearance where required by law, and undergo appropriate employment screening and reference checks. Staff must immediately notify the College if charged with or convicted of a relevant criminal offence, or if their Working With Children Check status changes.

Volunteers, Contractors and External Provider's

The College will take reasonable steps to ensure volunteers, contractors, external providers, and visitors comply with child protection requirements while engaged in College activities.

This may include:

- induction processes;
- supervision arrangements;

- WWCC verification;
- behavioural expectations;
- risk assessments for external providers and activities.

All third parties engaged by the College are expected to comply with the College's child protection and child safe requirements.

Record Keeping

The College is committed to keeping accurate records of all matters required by this Child Protection policy. The College will not disclose any information obtained by it in connection with employment screening, except as allowed by law.

The College will take all reasonable measures to prevent unauthorised access to information held on paper or electronic systems.

A member of staff who is the subject of relevant employment proceedings can:

- apply under the Privacy and Personal Information Protection Act 1998 and applicable privacy legislation for access to any documents held by the School containing information about those proceedings; and
- apply under the Privacy and Personal Information Protection Act 1998 and applicable privacy legislation for the amendment of any School records which contain information about the proceedings on the grounds that such records are incorrect or misleading.

Governance and Oversight

The College Executive and governing body are responsible for overseeing the implementation and review of child protection and child safe practices across the College.

This includes oversight of:

- policy implementation;
- staff training;
- child safety risk management;
- reportable conduct processes;
- compliance monitoring;
- incident reporting and record keeping.

The College will regularly review child protection systems to ensure ongoing compliance with legislative, regulatory, and best practice requirements.

Mandatory Reporting Threshold: Risk of Significant Harm (ROSH)

In accordance with the *Children and Young Persons (Care and Protection) Act 1998* (NSW), a mandatory report must be made when a staff member has reasonable grounds to suspect that a child is at **Risk of Significant Harm (ROSH)**.

- Staff may utilize the NSW Online Mandatory Reporter Guide (MRG) to determine whether a concern meets the ROSH threshold.

Concerns meet this threshold if there is a reasonable suspicion of:

- Significant physical, sexual, emotional, or psychological abuse.
- Significant neglect, including the failure to provide basic physical, medical, or educational care.
- Parents/caregivers being unwilling or unable to protect the child from significant harm.

Policy Review

The St Mark's Coptic Orthodox College Head of College is to ensure that this policy is regularly monitored and revised in the light of legislative or best practice changes.

Dictionary

- Assault includes physical assault and sexual assault. Physical assault must include all three of the following elements:
 - an act committed on or towards a child; and
 - an act where there is the application of force to a child or an act that causes a child to think that immediate force will be used on them; and
 - the act is hostile or reckless (a reckless act is one where the person foresees the likelihood inflicting injury or fear, and ignores the risk).
- Actual physical harm does not have to occur for an assault to have taken place. That is, the child does not have to be injured. Physical contact which is an inevitable part of everyday life does not amount to an assault.
- Sexual assault refers to a sexual offence against, with or in the presence of a child. It includes the involvement of children in sexual acts or acts of indecency and any sexual threat imposed on a child.
- Child means a person under the age of 18 years.
- Employment screening means any or all of the following procedures with respect to a person who is employed or who has applied to be employed in child-related employment:
 - a check for any relevant criminal record of the person, for any relevant apprehended violence orders made against the person or for any relevant employment proceedings completed against the person,
 - any other relevant probity check relating to the previous employment of other activities of the person,
 - an assessment of the risk to children involved in that child-related employment arising from anything disclosed by such a check, having regard to all the circumstances of the case,
 - the disclosure of the results of any such check or risk assessment to any person who determines whether the person is to be employed or continue to be employed in

that child-related employment (or to a person who advises or makes recommendations on the matter).

- Grooming behaviour means a pattern of behaviour aimed at engaging a child as a precursor to sexual abuse. The grooming process can include:
- persuading the child that a “special” relationship exists – spending inappropriate special time with the child, inappropriately giving gifts, showing special favours to them but not other children, allowing the child to overstep rules, etc.;
- testing of boundaries – undressing in front of the child, allowing the child to sit on the lap, talking about sex, ‘accidental’ touching of genitals, etc. These behaviours may not indicate risk of occurring in isolation but if there is a pattern of behaviour occurring, it may indicate grooming. Grooming behaviour constitutes a form of sexual misconduct.
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Reportable conduct means:

- any sexual offence, or sexual misconduct, committed against, with or in the presence of a child (including child abuse material), or
- any assault, ill-treatment or neglect of a child, or
- any behaviour that causes psychological harm to a child, whether or not, in any case, with the consent of the child.

Reportable conduct does not extend to:

- conduct that is reasonable for the purposes of the discipline, management or care of the children, having regard to the age, maturity, health, or other characteristics of the children and to any relevant codes of conduct or professional standards, or the use of physical force that, in all the circumstances, is trivial or negligible, but only if the matter is to be investigated and the result of the investigation recorded under workplace employment procedures, or
- Examples of conduct that would not constitute reportable conduct include (without limitation) touching a child in order to attract a child’s attentions, to guide a child or to comfort a distressed child; a school teacher raising his or her voice in order to attract attention or to restore order in the classroom; and conduct that is established to be accidental. Further examples of behaviours that are not reportable conduct include providing appropriate medical care to a child who is hurt; guiding a child by the shoulders, arms or hands; not providing supervision where this was for good reason, and for a short period of time where the risk of harm was reasonably perceived at the time be low; and actions found to have been appropriate physical contact in classes such as sport and drama.

Sexual misconduct includes a range of behaviours or a pattern of behaviour aimed at the involvement of children in sexual acts. Some of these behaviours may include:

- inappropriate conversations of a sexual nature;
- comments that express a desire to act in a sexual manner;
- unwarranted and inappropriate touching;

- sexual exhibitionism;
- personal correspondence (including electronic communication) with a child in respect of the adult's feelings for a child;
- deliberate exposure of children to sexual behaviour of others including display or pornography;
- possession of child abuse material in the workplace;
- grooming behaviour
- Staff and members of staff include any School employee and any individual engaged by the School to provide services to its students (even as a volunteer, bus driver, office staff, student teacher, private tutor or contractor).
- Imaged-based abuse and misuse of digital content:
 - The creation, possession, distribution, publication, or sharing of any image, video, or digitally altered material that depicts an individual in a sexually explicit, degrading, or otherwise inappropriate manner without their consent.
 - Any use of technology — including AI tools — to create, modify, or distribute images that misrepresent, exploit, harass, intimidate, or cause harm to another person may constitute serious misconduct and may also constitute a criminal offence under applicable legislation.
 - This includes deepfake, synthetic, AI-generated, altered, or manipulated content
 - Such conduct will be treated as a serious breach of College policy and may result in disciplinary action, including termination of employment (for staff) or suspension/expulsion (for students), and referral to relevant authorities where required.

Authorised By	
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