

Muhammadiyah Australia College

CHILD SAFETY COMPLAINTS POLICY



Endorsed on:	April 2026
Endorsed by:	Board of Directors
Next Review:	April 2027

Purpose

The purpose of this policy is to provide a process for raising and making a complaint about the College or the behaviour of any person within the College including a Board member, the Principal, College leadership member, teachers or other staff member, volunteer or contractor about child safety or child abuse allegations

This policy addresses the requirement to ensure the College has processes in place to manage complaints and concerns that are related to child safety or child abuse as stipulated in Ministerial Order No. 1359 – Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises.

For the purposes of this procedure ‘child abuse’ includes physical abuse, sexual abuse, grooming, family violence, emotional abuse, or neglect.

Other concerns or complaints not related to Child Safety can be raised in accordance with the Complaints Policy and Procedures.

Scope

This policy applies to all complaints and concerns relating to child safety or child abuse made by or in relation to a child or student, College staff, Board members, volunteers and contractors while connected to the College, or at College organised activities and events.

The policy covers all concerns and complaints regarding child safety and wellbeing including:

- Inappropriate behaviour of any staff member, including the Principals or senior staff, volunteers, contractors of College Board members towards children at the College
- Breachers of the Child Safety Policy and/or Child Safety Code of Conduct
- Allegations or suspicions of child abuse, neglect or grooming
- Risks to the psychological, emotional or physical safety of a child
- Failure of the College to make a report under the reportable conduct scheme, or under the offences of failure to protect, failure to disclose or grooming
- Concerns or complaints about the College’s response to any of the above.

Child safety or wellbeing concerns or complaints

As child safety or wellbeing concern or complaint is any concern that a child has been harmed, is at risk of harm, or has experienced inappropriate behaviour or conduct. It includes sexual offences, including grooming, sexual misconduct, physical violence, behaviour that causes significant emotional harm or neglect.

Comprehensive guidance on types of behaviours and conduct that is considered harmful or inappropriate, including child on child sexual behaviours or offending is contained in the College’s Child Safety Mandatory and Other Reporting Obligations Policy.

Making a Complaint about Child Safety

Students, parents, volunteers and College community members may raise concerns with or make a complaint to the College about child safety or child abuse allegations involving a student, directly with

the Principal, the Student Welfare/Wellbeing officer, the classroom teacher, or a member of the College Board.

The Principal as the senior officer is responsible for managing concerns or complaints relating to child safety or child abuse allegations in the first instance. The Principal is responsible for ensuring overall College compliance with child safety policies including the processes outlined in this policy.

Concerns can be raised:

- directly with a trusted staff member in person or by phone or email
- in writing to the Principal
- by phone to the Administration Office

The person or persons raising the concern or complaint may be assisted by a support person of their choice. All child safety concerns or complaints will be dealt with formally and in writing.

College staff response and actions

Concerns or complaints may be received by any member of the College community and staff will need to gather relevant information from the person raising a concern or making a complaint. The relevant College staff member will acknowledge a concern or complaint about child safety or a child abuse allegation involving a student by:

- Listening with an open mind and in a supportive manner and not making judgements about the allegation or truth of the concern or complaint.
- Ensuring all relevant details are sought and recorded including information about the party or parties involved.
- Confirming the relevant details, without seeking extensive information, or asking irrelevant, suggestive or leading questions (refer to PROTECT Identifying and responding to all forms of abuse in Victorian schools, for guidance on what and how to record relevant details of the concern or complaint).
- Taking (and retaining) a detailed file note (refer to PROTECT Recording your actions: Responding to suspected child abuse, for guidance on recording relevant information).
- Explaining when necessary that other people may need to be informed about the concern, in order to stop any inappropriate or unlawful behaviour and to comply with the College's legal obligations and procedures.
- Advising that the College takes all concerns or complaints of this nature seriously and will act on the information provided.
- Where required, ensuring that interpreters are provided to all parties by the College.
- Offering appropriate support to the student(s) or parties involved in the concern including their parents, carers, guardians or families. The College may need to refer parties to wellbeing and support services internally or external to the College (as required).
- Outlining the process that will be followed by the College in dealing with the concern or complaint as described in this procedure.

Staff **must** also ensure they comply with their personal reporting obligations as set out in the College's Child Safety Mandatory and Other Reporting Obligations Policy.

When complying with this procedure, it must be appreciated that fulfilling the roles and Responsibilities contained herein will not displace or discharge any other obligations that arise if a person reasonably believes that a student is at risk of child abuse or reportable conduct.

Managing child safety concerns or complaints

The College will follow these general steps when managing a concern or complaint relating to child safety or child abuse (refer to Appendix 1 below).

1. Staff receiving the concern or complaint will notify the Principal (or relevant officer if the concern or complaint involves the Principal) as soon as practicable.
2. All concerns or complaints will be acknowledged in writing within 48 hours of receipt, however lodged.
3. The Principal will make every reasonable effort to investigate such matters within 5 working days of receipt. When this is not possible, the College will inform the complainant in writing of the delay and the reasons for it, and the expected timeframe for completion.
4. In conducting the investigation, the process will comply with the overarching principles as outlined in the College Complaints Policy, and the complainant will be offered the opportunity to meet formally with the Principal and will be provided an outcome in writing.
5. The Principal (or relevant officer i.e. College Chair) will take such steps as considered appropriate in line with the College processes to protect any student connected with a concern or complaint until it is resolved, including by ensuring that any mandatory or other reporting obligations are met.

This may require any allegations, suspicions or disclosures are made to relevant authorities (including but not limited to Victoria Police, Child Protection or Social Services Regulator (SSR) (formerly the Commission for Children and Young People)), regardless of whether there is a legal obligation to report.

6. Where a concern involves allegations against a College staff member, the Principal will notify the staff member about those allegations (to the extent that it is appropriate to do so, which may initially involve only notification that there has been a concern), outline the process to be followed, and advise the staff member about the process pending the resolution of the concern or complaint.

It may be appropriate in some instances to require the staff member to be removed from all duties, without judgement, while the concern or complaint is being resolved.

7. Where a concern relates to the Principal or a College Board member, it will be referred to the Chair of the College Board for management.

If it is deemed necessary to remove the Principal from all duties, without judgement, while the concern or complaint is being resolved, the Chair of the Board will appoint an Acting Principal.

8. The decision-maker will usually be the Principal, except where the concern relates to the alleged conduct or misconduct of the Principal, then the decision-maker will be the Chair of the College Board.
9. Complainants will be provided with written advice of the outcome of the investigation of their concern or complaint.
10. The Principal will ensure a record of the concern or complaint is retained securely and that the College response to the matters raised is similarly recorded and securely retained on file.

Investigating and Resolving the Concern or Complaint

The Principal will investigate the concern or complaint and consider any information already provided by staff or directly from a complainant or student, as well as relevant information or documents gathered during the investigation.

Any investigation will usually involve:

- Interviewing the subject of the concern and key witnesses or individuals (noting that more than one interview may be required).
- Reviewing relevant information, documents, correspondence and materials of substance, including CCTV footage.
- Taking notes of any interviews (or where appropriate, transcripts of audio recordings of any interviews) during the investigation.
- Determining whether, on the balance of probabilities, the concern is substantiated.

It may not always be appropriate or possible for the College to investigate where a concern or complaint is raised with the College and there are active investigations underway by Victoria Police, SSR or VIT relevant to the concern or complaint or civil or criminal proceedings relevant to the concern are ongoing.

In such circumstances, the College will seek and act on legal advice to comply with this procedure to the extent it is appropriate to do so (and in particular to protect the safety and wellbeing of all current students).

The College may decide that in some cases legal advice should be sought to properly investigate or determine the concern or complaint.

Resolution of Concern or Complaint

The Principal will take appropriate action if a concern or complaint is substantiated. This may include, but is not limited to:

- requiring staff to undertake mandatory reporting refresher training
- providing a staff member or all staff with further child safety training as well as cultural appropriate safety training where relevant
- reallocating staff duties
- terminating employment for serious misconduct
- ceasing the engagement of a volunteer
- removal of Board member from the College Board
- reporting to law enforcement and child welfare agencies.

Where a concern is not substantiated, the findings made by the Principal may, in certain cases, still result in disciplinary action (e.g. reallocation of duties, implementing staff support or mentoring programs, suspension etc).

Following the conclusion of its investigation, the Principal will indicate the outcomes of the investigation to:

- The person (student and/or parents, etc) who raised the concern or complaint.
- The person subject of that concern or complaint (where appropriate).

- Any external authorities (including but not limited to Child Protection, Victoria Police or SSR) to whom a report is required to be made.

Responding and Reporting Obligations

The mandatory and other reporting obligations that apply to the College and its staff are addressed in the College's separate Child Safety Mandatory and Other Reporting Obligations Policy.

College staff are also required to adhere to the Child Safety Policy and follow the Four Critical Actions for complaints and concerns relating to adult behaviour towards a child and the Four Critical Actions: Student Sexual Offending for complaints and concerns relating to student sexual offending.

The College will cooperate with any external authorities (including but not limited to SSR, Child Protection and Victoria Police) in relation to a concern, complaint or report (whether made under this procedure or otherwise).

Recordkeeping

The Principal will ensure that:

- clear and contemporaneous records of any concerns or complaints are taken, where possible, by the staff member, volunteer or contractor who received information about the incident, disclosure or suspicion
- detailed notes are taken of any immediate or ongoing action taken by the College to respond to the incident, disclosure, allegation or suspicion
- all relevant records relating to the incident, disclosure, allegation or suspicion, including the actions taken by the College, are stored securely and maintain privacy of affected persons as appropriate to the situation
- an incident report is provided to the College Board for appropriate oversight.

Appropriate confidentiality and procedural fairness will be maintained at all times when dealing with concerns and complaints under this procedure. Information will only be provided to those parties who have a right or legal authority to seek information.

Communication

This policy will be communicated to our College community in the following ways:

- Provided to staff at induction and included in staff handbook/manual
- Discussed at staff meetings/briefings as required
- Made available publicly on our College website
- Made available in hard copy from College administration upon request

Related Policies

- Duty of Care Policy
- Bullying and Harassment Policy
- Child Safety Policy
- Child Safety Code of Conduct
- Child Safety Mandatory and Other Reporting Obligations Policy and Procedures
- Child Safe Standards Risk Register
- Child Safety Visitors Policy
- Child Safety Volunteers Policy
- Complaints Management Policy
- Privacy Policy
- Child Safety Recordkeeping Policy
- Student Behaviour Management Policy

Resources

The following resources provide appropriate guidance and support in implementing this procedure:

- [Identifying and Responding to All Forms of Abuse in Victorian Schools](#)
- [Four Critical Actions for Schools](#)
- [Identifying and Responding to Student Sexual Offending](#)
- [Four Critical Actions for Schools: Responding to Student Sexual Offending](#)
- [Recording your actions: Responding to suspected child abuse – A template for Victorian schools](#)

Appendix 1: Step by Step Guide

Step	Action	Responsibility
Step 1	A concern or complaint is received	By any staff member or designated contact
Step 2	Assess immediate safety – Is the child/student in immediate danger?	Staff or volunteer receiving the complaint
Step 3	If in danger, contact Police (000) or Child Protection immediately	Any staff member, volunteer, Principal
Step 4	Record the complaint in detail	Staff receiving the complaint
Step 5	Notify the Principal immediately	Staff receiving complaint
Step 6	Determine the type of concern: <ul style="list-style-type: none"> • Mandatory report • Crimes Act offence (failure to protect, failure to disclose, grooming offence) • Breach of Code of Conduct • Reportable conduct 	Note: Mandated reporters must report event if a report has been made to the Principal to meet their legal obligations
Step 7	<ul style="list-style-type: none"> • Make required external reports/notifications • The Principal must consult with DFFH - Child Protection or Victoria Police to determine what information can be shared with parents/carers • They may advise not to contact parents/carers e.g. in circumstances where the parents/carers are alleged to have engaged in the abuse or to contact the parents/carers as soon as possible (preferably on the same day) and provide agreed information • Notify the Chair of the College Board 	Principal and/or mandated reporter
Step 8	Acknowledge complaint and inform relevant parties of the process, timelines and supports (only where informing parties would not further endanger a child) All child safety concerns or complaints will be dealt with formally and in writing.	Principal or delegate

	<ul style="list-style-type: none"> All concerns or complaints will be acknowledged in writing within 48 hours of receipt, however lodged. The Principal or delegate will make every reasonable effort to investigate such matters within 20 working days of receipt. When this is not possible, the College will inform the complainant in writing of the delay and the reasons for it, and the expected timeframe for completion. In conducting the investigation, the process will comply with the overarching principles as outlined in the Complaints and Grievances Policy. The complainant will be provided an outcome in writing, and a formal meeting will be arranged. 	
Step 9	Conduct internal investigation if appropriate (except prohibited due to active Police/Child Protection involvement)	Principal / delegate
Step 10	Cooperate fully with external authorities (i.e., CCYP, Police, Child Protection)	Principal and/or College Board Chair
Step 11	Provide regular updates to complainant, respecting privacy and safety	Principal
Step 12	<p>Determine outcome and implement appropriate action:</p> <ul style="list-style-type: none"> Support Plans for student affected Further training in child safety, reporting obligations, etc for staff/volunteers/College Board, etc Referral to counsellor/psychologist/medical practitioners 	Principal
Step 13	Document all steps taken in a secure, confidential file	Principal
Step 14	Provide support to student/s, families, staff and other members of the college community affected	Principal
Step 15	Review college child safety policies and procedures; review and update as required the child safety risk register	Led by Principal
Step 16	Report to College Board	Principal

When complying with this guide, it must be noted that fulfilling the roles and responsibilities contained herein will not displace or discharge any other obligations that arise if a person reasonably believes that a student is at risk of child abuse or reportable conduct.