

| POLICY                                    |                                                                                                                                                                                                                                                                                                                                                                                                      | PROCEDURE |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>Procedure Name</b>                     | Child Protection Procedure                                                                                                                                                                                                                                                                                                                                                                           |           |
| <b>NESA Manual Section</b>                | Safe and Supportive Environment (B8)<br>Child Protection (B8.1)                                                                                                                                                                                                                                                                                                                                      |           |
| <b>Related Procedures &amp; Registers</b> | Working With Children Check Procedure (B8.1)<br>Staff Code of Conduct Procedure (B8.2)<br>Complaint Handling Procedure (B8.2)<br>Complaint Handling Procedural Fairness Guidelines (B8.2)<br>Complaint Handling Process Flow Chart (B8.2)<br>Complaints or Allegations of Staff Misconduct Flow Chart (B8.2)<br>Staff Recruitment and Screening Procedure (B3)<br>Student Wellbeing Procedure (B8.2) |           |
| <b>Related Policies</b>                   | Child Protection Policy (B8.1)<br>Working With Children Check Policy (B8.2)<br>Staff Code of Conduct Policy (B8.2)<br>Complaint handling Policy (B8.2)<br>Staff Recruitment and Screening Policy (B3)<br>Privacy & Confidentiality Policy (B8.2)<br>Student Wellbeing Policy (B8.2)                                                                                                                  |           |
| <b>Related Legislation</b>                | <a href="#">Children's Guardian Act 2019 (NSW)</a><br><a href="#">Children and Young Persons (Care and Protection) Act 1998 (NSW)</a><br><a href="#">Child Protection (Working With Children) Act 2012 (NSW)</a><br><a href="#">Crimes Act 1900 (NSW)</a><br><a href="#">Education Act 1990 (NSW)</a>                                                                                                |           |
| <b>Date of Issue / Last Revision</b>      | 20 September 2018<br>27 March 2019<br>27 March 2020<br>28 March 2022<br>11 November 2025<br>26 January 2026<br>23 August 2026                                                                                                                                                                                                                                                                        |           |
| <b>Date Set for Review</b>                | August 2029                                                                                                                                                                                                                                                                                                                                                                                          |           |

## Child Protection Procedure

At Central Coast Montessori Primary School (CCMPS), the safety, protection and wellbeing of children are paramount. These *Child Protection Procedure* describe how CCMPS implements the *Child Protection Policy* in practice and how the School prevents, identifies and responds to child protection and wellbeing concerns in accordance with NSW legislation and NESA registration requirements.

These procedures support the *Child Protection Policy* by providing clear, consistent and lawful processes for reporting, responding to and recording child protection matters, while ensuring that children are supported and that staff, contractors and volunteers understand their responsibilities.

### Scope

These procedures apply to all employees, contractors, volunteers, external providers and board members who engage with children or perform work on behalf of CCMPs. They govern the day-to-day operational processes for child protection, including mandatory reporting, reportable conduct, Working With Children Check compliance, training, record-keeping and response actions.

## **Key Principles**

These procedures are guided by the following principles, which underpin all child protection actions and decisions at CCMPs:

- Child safety first — The safety, welfare and wellbeing of children are the primary consideration in all decisions and actions taken by the School.
- Legal compliance — All child protection responses comply with relevant NSW legislation, regulatory obligations and NESA registration requirements.
- Timely reporting — Child protection concerns are reported promptly to enable early intervention and reduce risk to children.
- Confidentiality — Information is handled sensitively, lawfully and shared only with authorised parties.
- Procedural fairness — All parties are treated respectfully and without presumption while concerns are assessed and responded to.

## **Prevention and Risk Management**

CCMPs takes proactive and preventative steps to reduce the risk of harm to children and to promote a child safe culture across the School. CCMPs maintains preventative practices to minimise risk to children, including:

- staff recruitment, screening and induction processes
- mandatory Working With Children Check verification
- clear Codes of Conduct
- supervision and risk assessment practices
- child protection training and regular refreshers
- fostering a child safe culture where concerns can be raised without fear.

## **Training and Awareness**

Ongoing training and awareness are essential to ensuring that child protection responsibilities are understood and consistently applied.

### Child Protection Training

CCMPs provides structured child protection training to ensure staff understand their legal and professional obligations. This includes:

- annual child protection training for all staff
- induction training for new staff, contractors and relevant volunteers
- updates on legislative changes and emerging best practice.

### Staff Responsibilities

All staff are expected to actively engage with child protection training and to apply this knowledge in their daily work. Staff must remain familiar with reporting obligations, respond appropriately to concerns, and seek guidance from the Principal where uncertainty exists.

## **Working With Children Checks (WWCC)**

Before commencing child-related work, CCMPS:

- verifies WWCC clearances through the Office of the Children's Guardian (OCG)
- records clearance details in the WWCC Register
- ensures workers without valid clearance do not engage in child-related work.

WWCC records are monitored to ensure currency and compliance.

### Changes to WWCC Status

Workers must immediately notify the Principal if their WWCC status changes or if they become subject to an interim bar or risk assessment.

## **Identifying Child Protection Concerns**

Staff must remain alert to indicators of:

- physical, sexual or emotional abuse
- neglect
- psychological harm
- concerning or inappropriate behaviour by adults
- disclosures made directly or indirectly by children.

Staff must not investigate concerns or seek to validate allegations independently.

## **Responding to Child Protection Concerns**

### Internal Reporting

Staff must promptly report to the Principal:

- any child protection or wellbeing concern
- suspicions of risk of significant harm (ROSH)
- disclosures made by a child
- concerns involving staff, contractors or volunteers.

If the concern involves the Principal, the matter must be reported directly to the Chair of the School Board.

### Immediate Risk

Where a child is in immediate danger or urgent assistance is required, staff must take immediate action to protect the child, including contacting NSW Police or emergency services on **000** where required. The Principal must be notified as soon as practicable.

Where there are reasonable grounds to suspect that a child is at risk of significant harm, the mandatory reporting process below must also be followed.

### Mandatory Reporting

Where a mandatory reporter has reasonable grounds to suspect that a child aged under 16 years is at risk of significant harm and those grounds arise during, or from, their work, the mandatory reporter must:

- use the **Mandatory Reporter Guide (MRG)** and professional judgement to assist in determining the appropriate response;
- where a report to DCJ is required, make the report as soon as practicable through the **Child Protection Helpline (13 21 11)** or **ChildStory Reporter eReport**, as appropriate;
- provide all relevant information available to assist assessment of the concern; and
- document the action taken in accordance with School record-keeping requirements.

**Reporting a concern internally to the Principal does not replace or delay the mandatory reporter's individual legal reporting obligation.**

#### Concerns Below the Risk of Significant Harm (ROSH) Threshold

Where a concern does not meet the threshold for a report to DCJ, staff must continue to consider the safety, welfare and wellbeing of the child and consult with the Principal regarding appropriate support, monitoring, referral or other action.

The outcome of the MRG does not prevent a mandatory reporter from taking other action they reasonably consider appropriate to support the child.

### **Reportable Conduct Process**

#### Staff Obligations

Staff must immediately notify the Principal if they:

- become aware of an allegation of reportable conduct involving an employee
- observe inappropriate behaviour by an employee
- are charged with or convicted of a reportable offence.

#### Head of Relevant Entity Responsibilities

The Head of Relevant Entity (HRE), or appropriately authorised delegate where permitted:

- assesses whether information constitutes a reportable allegation or reportable conviction;
- notifies the OCG within seven (7) business days where required;
- assesses and manages risks to children and relevant persons;
- undertakes or arranges an appropriate investigation;
- consults NSW Police and/or DCJ before progressing an investigation where their involvement requires this;
- ensures procedural fairness and appropriate support for affected parties;
- provides an interim report or final entity report to the OCG within 30 calendar days, as applicable; and
- provides the final entity report following completion of the investigation or determination.

Where a reportable conduct investigation is required, CCMPs may use relevant Independent Schools NSW guidance, investigation resources and template correspondence to support a procedurally fair and appropriately documented process. Current versions of these resources should be obtained at the time they are required.

## **Criminal Offences**

Staff must be aware of offences under the *Crimes Act 1900 (NSW)*, including failure to protect, failure to report and offences relating to special care relationships. Concerns of criminal conduct must be reported to Police in accordance with legal obligations.

## **Record-Keeping and Documentation**

The Principal ensures secure maintenance of:

- incident reports
- mandatory reporting records
- reportable conduct notifications and investigations
- WWCC Register
- training and policy acknowledgement records.

Records are retained in accordance with legislative, regulatory and NESA requirements and accessed only by authorised personnel.

## **Confidentiality and Information Sharing**

Child protection information must be:

- treated sensitively and with appropriate confidentiality;
- shared only where authorised, required or permitted by law or School procedure;
- limited to information reasonably necessary for the relevant purpose;
- documented where information is formally requested or exchanged; and
- stored securely.

Unauthorised disclosure may constitute misconduct.

### **Information Sharing**

CCMPS may request, provide or exchange information with prescribed bodies where authorised under Chapter 16A of the Children and Young Persons (Care and Protection) Act 1998 (NSW) and where the information relates to the safety, welfare or wellbeing of a child or young person.

Information sharing must be undertaken lawfully, appropriately and only to the extent necessary for the relevant child safety or wellbeing purpose. Requests for or disclosure of information under Chapter 16A should ordinarily be coordinated through the Principal or authorised delegate and appropriately documented.

## **Monitoring, Evaluating and Review**

This Procedure will be reviewed three (3) years, or earlier if required due to changes in legislation, NESA guidelines, or identified gaps in practice.

Continuous improvement will be guided by updates from NESA, AISNSW, relevant legislation, and best practice guidance. Regular reviews will ensure ongoing compliance and alignment with regulatory requirements.

## **Related Documents and References**

[NESA Registered and Accredited Individual Non-Government Schools \(NSW\) Manual February 2026](#)

[NSW Office of the Children's Guardian – Child Safe Scheme and Child Safe Standards](#)

[NSW Office of the Children's Guardian – Reportable Conduct Scheme guidance](#)

[NSW Office of the Children's Guardian – Working with Children Check guidance](#)

[NSW Department of Communities and Justice – Mandatory Reporter Guide \(MRG\)](#)

[NSW Department of Communities and Justice – ChildStory Reporter](#)

[NSW Department of Communities and Justice – Child Protection Reporting guidance](#)

[Independent Schools NSW – Child Protection Policy for NSW Independent Schools](#)

[Independent Schools NSW – Child Protection and Safeguarding Audit Tool](#)

[Independent Schools NSW – Chapter 16A Information Sharing guidance](#)

[Independent Schools NSW – Reportable Conduct Scheme guidance, investigation resources and template correspondence](#)

[National Principles for Child Safe Organisations](#)

In the event of any inconsistency between this Procedure and applicable legislation, the legislation will prevail.