2026

# Al Zahra College Child Protection Policy

**Last reviewed: November 2026**

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|---|---|
| **Policy owner** | Headmaster / Head of Relevant Entity (HRE) |
| **Applies to** | Employees, contractors, volunteers, clergy/religious instructors, work experience participants and other workers engaged by the College |
| **Approved by** | Headmaster/ Governing Council |
| **Review cycle** | At least annually, and earlier following legislative, OCG, DCJ, NESA or operational change |
| **Next scheduled review** | 2027, or earlier if required |
| **Version** | 7.0 – Governing Council-ready 2026 |

## 1. Purpose and commitment

Al Zahra College is committed to providing an environment in which the safety, welfare, dignity and wellbeing of every child and young person are paramount. Child protection is a shared responsibility and is embedded in the College's governance, leadership, staffing, risk management, teaching, wellbeing and complaints processes.

The College's approach reflects its Islamic ethos and the values of trust (amanah), justice ('adl), mercy (rahmah), dignity, care and responsibility. These values reinforce, and do not replace, the College's legal obligations. Where a legal reporting threshold is met, required reports must be made regardless of cultural, family, community or reputational considerations.

The purpose of this policy is to explain the duties of the College and its workers, establish clear reporting pathways, support prevention and early intervention, and ensure child-safety concerns are responded to promptly, lawfully and fairly.

## 2. Scope

This policy applies to:

- all employees, including teaching and non-teaching staff;
- contractors, consultants, casuals and agency staff;
- volunteers and work experience participants;
- persons providing pastoral or liturgical services; and
- any other person engaged by or on behalf of the College whose role brings them within child-protection, reportable-conduct or WWCC obligations.

All persons within scope must comply with this policy, the College Code of Conduct, professional-boundary requirements, lawful directions, and any child-safety procedures issued by the College.

## 3. Key legal and regulatory framework

This policy is informed by the current NSW framework, including:

- Children and Young Persons (Care and Protection) Act 1998 (NSW) – including risk of significant harm (ROSH), mandatory reporting and information exchange.
- Children's Guardian Act 2019 (NSW) – including the Reportable Conduct Scheme and Child Safe Scheme.
- Child Protection (Working with Children) Act 2012 (NSW) and associated Regulation – WWCC obligations.
- Crimes Act 1900 (NSW) – including relevant child-abuse, grooming, failure-to-protect and failure-to-report offences.
- Education Act 1990 (NSW), Education Regulation and NESA registration requirements for non-government schools.
- Work Health and Safety Act 2011 (NSW), privacy/confidentiality obligations and other laws applying to the circumstances.

The College will have regard to current guidance issued by the NSW Department of Communities and Justice (DCJ), Office of the Children's Guardian (OCG), NSW Police and NESA.

## 4. Definitions

| Term | Meaning |
|---|---|
| **Child** | For mandatory reporting under the Care Act, a child is a person under 16 years. For the Reportable Conduct Scheme and most College child-safety purposes, a child is a person under 18 years. |
| **Young person** | A person aged 16 or 17 years under the Care Act. |
| **ROSH** | Risk of significant harm. A child is at ROSH where current concerns for the child's safety, welfare or wellbeing are present to a significant extent because of circumstances recognised under the Care Act. |
| **Mandatory reporter** | A person in a category prescribed by section 27 of the Care Act. In a school this includes teachers, counsellors, principals and relevant education workers/managers; the categories also extend to certain religious ministry and religion-based roles. |
| **Head of Relevant Entity (HRE)** | The statutory head of the College for the purposes of the NSW Reportable Conduct Scheme. For this policy, the Headmaster is the HRE, provided the Headmaster is the College's most senior executive decision-maker. If the College's governance structure formally identifies another person as HRE, that formal designation prevails. |
| **Reportable allegation** | An allegation that an employee has engaged in conduct that may be reportable conduct. Proof is not required at the notification stage. |
| **Reportable conduct** | Conduct defined under the Children's Guardian Act 2019, including a sexual offence, sexual misconduct, ill-treatment of a child, neglect of a child, assault against a child, certain failure-to-protect/failure-to-report offences, and behaviour causing significant emotional or psychological harm to a child. |
| **Employee (Reportable Conduct Scheme)** | A term with a broader statutory meaning than ordinary employment and may include employees, volunteers and contractors captured by the Act. The College will apply the statutory definition to each matter. |
| **WWCC** | The NSW Working with Children Check administered by the OCG. |

# 5. Roles and responsibilities

## 5.1 All workers

Every worker must:

- place child safety ahead of convenience, reputation or personal relationships;
- report any child-safety, welfare or wellbeing concern internally to the Headmaster/HRE or delegated child-safety leader as soon as practicable;
- make or facilitate any external report required by law and not allow an internal reporting process to delay an urgent statutory report;
- respond calmly and appropriately to disclosures, listen without leading or investigating, and record the child's words as accurately as practicable;
- maintain professional boundaries and comply with the College Code of Conduct;
- preserve confidentiality and disclose information only on a need-to-know or lawful basis;
- complete required child-protection and child-safe training; and
- cooperate with lawful investigations, risk-management directions and information requests.

## 5.2 Headmaster / Head of Relevant Entity

The Headmaster is the College's Head of Relevant Entity (HRE) for the purposes of this policy, subject to the College's formal governance arrangements. The Headmaster/HRE has ultimate responsibility for ensuring systems exist to prevent, identify, receive, assess and respond to child-safety concerns, including:

- ensuring prompt reporting to DCJ, NSW Police and the OCG where required;
- notifying the OCG of reportable allegations/convictions within statutory timeframes;
- arranging and overseeing reportable-conduct investigations and procedural fairness;
- conducting and reviewing risk assessments and implementing interim risk controls;
- ensuring WWCC compliance and appropriate recruitment/screening systems;
- ensuring child-safety records are secure, retrievable and appropriately retained;
- ensuring students and families know how to raise concerns and complaints;
- ensuring the College implements and continually improves against the NSW Child Safe Standards; and
- reporting relevant compliance matters to the proprietor/Governing Council and regulators where required.

## 5.3 Wellbeing Coordinators

The Wellbeing Coordinators are designated internal child-safety and wellbeing contacts. Their role is to make it easy for staff and students to raise concerns and to support prompt, consistent action. They may:

- receive and document child-safety, welfare and wellbeing concerns;
- support staff to use the Mandatory Reporter Guide and understand reporting pathways;
- coordinate immediate student wellbeing and safety supports;
- escalate serious or potentially reportable matters promptly to the Headmaster/HRE;
- liaise, as authorised, with counsellors, the psychologist, families and external agencies; and
- assist with follow-up, safety planning and secure recordkeeping.

A Wellbeing Coordinator is not automatically an HRE delegate. Any delegation of statutory HRE functions must be formally documented and managed in accordance with OCG requirements. Internal referral to a Wellbeing Coordinator does not remove or delay any individual mandatory-reporting obligation.

### 5.4 Counsellors and Psychologist

The College counsellors and psychologist provide specialist assessment, support and advice within their professional scope. They are expected to:

- respond to student wellbeing, mental-health and safety concerns within their professional role;
- support risk assessment, safety planning and referral to appropriate services;
- promptly escalate child-protection concerns to the Headmaster/HRE and/or a Wellbeing Coordinator;
- make any statutory report required of them as a mandatory reporter where the legal threshold applies;
- maintain appropriate professional records, confidentiality and information-sharing practices; and
- work collaboratively with the Wellbeing Coordinators and Headmaster/HRE while maintaining professional responsibilities and independence.

The psychologist is a mandatory reporter through relevant health/psychological services. Counsellors and other staff may also be mandatory reporters depending on their role and the statutory categories that apply. Where a worker is a mandatory reporter, the worker retains their own legal obligation to report ROSH; an internal escalation process must not prevent or delay that obligation.

### 5.5 Al Zahra College internal reporting pathway

The ordinary internal pathway is: Staff member / student concern → Wellbeing Coordinator, Counsellor or Psychologist → Headmaster/HRE → external authority where legally required. A staff member may report directly to the Headmaster/HRE at any time.

Exceptions: (1) immediate danger or urgent criminal/medical risk → call 000 first; (2) concern involving the Headmaster/HRE → report directly to the Chair of the College Governing Council/Proprietor or other authorised responsible person; (3) an individual mandatory reporter must make or facilitate their statutory report as soon as practicable and must not wait for internal approval.

## 6. Mandatory reporting – risk of significant harm (ROSH)

### 6.1 When a mandatory report is required

A mandatory reporter must make a report to DCJ as soon as practicable where, in the course of their work or role, they have reasonable grounds to suspect that a child aged 0–15 years is at risk of significant harm. The College's internal reporting pathway is supportive and does not transfer, replace or extinguish an individual mandatory reporter's legal duty.

For young people aged 16–17, a report is not mandatory under section 27 solely because of age, but the College expects concerns about serious safety, welfare or wellbeing risks to be assessed and, where appropriate, reported to DCJ or another relevant authority.

### 6.2 Using the Mandatory Reporter Guide

Mandatory reporters should use the NSW Mandatory Reporter Guide (MRG) together with professional judgement to decide whether the ROSH threshold is met and what action should be taken. The MRG does not replace professional judgement or an obligation to act in an emergency.
Access the NSW Mandatory Reporter Guide (MRG): https://reporter.childstory.nsw.gov.au/

### 6.3 Indicators / circumstances

ROSH concerns may include, to a significant extent:

- unmet basic physical or psychological needs;
- failure or inability to arrange necessary medical care;
- failure or inability to arrange education required by law;
- physical abuse, sexual abuse or ill-treatment;
- domestic/family violence creating risk of serious physical or psychological harm;
- parent or caregiver behaviour causing or risking serious psychological harm; or
- other circumstances recognised by the Care Act, including relevant prenatal-report circumstances.

Reasonable grounds may arise from direct observations, a disclosure, information from another person, professional knowledge, or reasonable inferences. Staff are not required to prove abuse or conduct their own investigation before reporting.

### 6.4 How to report

1. If a child is in immediate danger or urgent police/medical intervention is needed, call 000.
2. Notify the Headmaster, Wellbeing Coordinator or another designated child-safety contact as soon as possible, unless doing so would create delay or the concern involves that person.
3. Complete the NSW Mandatory Reporter Guide where appropriate.
4. Where the ROSH threshold is met, make or facilitate the report to the NSW Child Protection Helpline on 13 21 11 or through ChildStory Reporter where available.
5. Record the concern, action taken, date/time, MRG outcome and any reference number in the College's secure child-protection record system.
6. Continue to support and respond to the child's needs within the worker's role after a report is made.

### 6.5 Parents and caregivers

Staff must not automatically inform a parent or caregiver that a child-protection report has been or will be made. Whether a family is informed must be determined by the Headmaster/HRE having regard to the child's safety, advice from DCJ/Police, the integrity of any investigation and the circumstances of the matter.

## 7. Reportable Conduct Scheme – Office of the Children's Guardian

Al Zahra College is a relevant entity under the NSW Reportable Conduct Scheme. The Scheme is allegations-based. A matter may require notification even where the facts are disputed or the allegation has not yet been substantiated.

### 7.1 What must be reported internally

A worker must immediately report to the Headmaster/HRE any allegation, observation, disclosure or information suggesting that another employee/worker may have engaged in reportable conduct or may have a reportable conviction. This includes information relating to the worker themself.

If a worker is unsure whether conduct is reportable but believes it may be inappropriate, unsafe, a breach of professional boundaries or contrary to the Code of Conduct, it must still be reported internally.

## 7.2 Allegations involving the Headmaster/HRE

Any allegation or concern involving the Headmaster/HRE must be reported immediately to the Chair of the College Governing Council or other formally authorised responsible person. That person must obtain advice about the correct HRE arrangements and ensure all statutory notifications and risk-management steps occur without delay.

## 7.3 Categories of reportable conduct

- sexual offence;
- sexual misconduct;
- ill-treatment of a child;
- neglect of a child;
- assault against a child;
- an offence under section 43B or section 316A of the Crimes Act 1900; and
- behaviour that causes significant emotional or psychological harm to a child.

## 7.4 Statutory notification and reporting timeframes

| Action | Timeframe | Responsibility |
|---|---|---|
| Notify OCG of reportable allegation / reportable conviction | Within 7 business days of the HRE becoming aware | HRE |
| Interim report if investigation/determination not complete | Within 30 calendar days of the HRE becoming aware | HRE |
| Entity report / final report | When investigation/determination is completed, within a reasonable timeframe and in accordance with OCG requirements | HRE |

## 7.5 Immediate assessment and external agencies

On receiving a possible reportable allegation, the HRE will:

- assess whether the information may constitute a reportable allegation or conviction;
- assess immediate and ongoing risks to the child, other children, witnesses, staff, the subject employee and the integrity of the investigation;
- consider whether NSW Police and/or DCJ must be notified;
- avoid taking investigative steps that could compromise a Police/DCJ investigation and comply with any requirement to suspend or defer the College investigation;
- notify the OCG within the statutory timeframe where required; and
- arrange a fair, appropriately scoped investigation or determination as soon as practicable.

## 1. 7.6 Investigation principles

- child safety and wellbeing are prioritised;
- procedural fairness is provided to the subject employee;
- conflicts of interest are identified and managed;
- evidence is gathered lawfully and objectively;
- the subject employee is informed of the substance of allegations at the appropriate time and given a reasonable opportunity to respond;

- findings are made on the applicable civil standard, having regard to the statutory considerations and seriousness of the allegation;
- the investigation is completed within a reasonable timeframe;
- confidentiality is maintained; and
- appropriate support is offered to the child, witnesses and subject employee.

### 7.7 Risk management during an investigation

Interim risk controls are protective, not disciplinary findings. Depending on the risk assessment, measures may include increased supervision, changes to duties, restrictions on contact with specified students, alternate work arrangements, or suspension from duties. Risk controls must be reviewed as information changes.

### 7.8 Information to the alleged victim / parent or carer

The HRE will comply with the Children's Guardian Act 2019 requirements concerning information to the alleged victim and their parent/carer about the allegation, progress, findings and action taken, subject to lawful exceptions and any public-interest, safety, privacy or investigation constraints.

## 8. Working with Children Check (WWCC)

The College will maintain registration as a child-related employer and identify which roles are child-related work and therefore require a NSW WWCC.

### 8.1 Before engagement / commencement

- The College must verify required WWCC details through the OCG's online system before a person performs child-related work, subject to the specific statutory rules applying to the role.
- Teachers and other education-sector roles that require a clearance must satisfy the applicable clearance requirement before commencing child-related work.
- A person must not self-verify their own WWCC.
- A WWCC is not a substitute for reference checks, identity checks, qualification checks, safer-recruitment practices, supervision or compliance with the Child Safe Standards.

### 8.2 Records

For each person requiring verification, the College will keep current records including:

- full name;
- date of birth;
- WWCC number;
- verification date;
- verification outcome/status;
- clearance expiry date; and
- whether the engagement is paid or voluntary.

### 8.3 Ongoing monitoring and action

- The College will ensure renewal verification occurs when a WWCC is renewed.
- Workers must promptly tell the College of relevant changes to their WWCC status or eligibility.

- A person whose status is barred, interim barred, expired, cannot be found or is otherwise not valid for the work must be removed from child-related work immediately in accordance with OCG requirements.
- The College will keep its authorised employer contacts current so OCG monitoring notifications are received and acted upon.

## 9. NSW Child Safe Standards

Non-government schools in NSW are required to implement the Child Safe Standards through their systems, policies and procedures. Al Zahra College will use the Standards as an organisation-wide framework rather than treating child protection as a reporting-only function.

Standard 1: Child safety is embedded in organisational leadership, governance and culture.

Standard 2: Children participate in decisions affecting them and are taken seriously.

Standard 3: Families and communities are informed and involved.

Standard 4: Equity is upheld and diverse needs are taken into account.

Standard 5: People working with children are suitable and supported.

Standard 6: Processes to respond to complaints of child abuse are child-focused.

Standard 7: Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training.

Standard 8: Physical and online environments minimise opportunities for abuse or other harm.

Standard 9: Implementation of the Child Safe Standards is continuously reviewed and improved.

Standard 10: Policies and procedures document how the organisation is child safe.

The College will maintain evidence of implementation, including governance oversight, risk assessments, safer recruitment, induction and training, student voice, accessible complaints pathways, online-safety controls, review processes and documented improvements.

## 10. Responding to a disclosure or concern

When a child discloses abuse, harm or unsafe conduct, staff should:

- listen calmly and take the child seriously;
- reassure the child that they did the right thing by speaking up;
- avoid promises of secrecy; explain that information may need to be shared with people who can help keep them safe;
- ask only open, minimal questions needed to clarify immediate safety or basic facts; do not interrogate or investigate;
- use the child's own words in the written record wherever possible;
- do not confront the alleged person responsible;
- take immediate action where emergency medical or police assistance is required;

- report the concern through the pathways in this policy; and
- ensure the child has appropriate ongoing wellbeing support.

# 11. Information sharing, confidentiality and recordkeeping

## 11.1 Confidentiality

Child-protection information is highly sensitive. It must be shared only where authorised or required by law, or where necessary for child safety, risk management, investigation, procedural fairness or the proper administration of the College's obligations. Staff must not discuss matters with colleagues, students, families or community members who do not have a legitimate need to know.

## 11.2 Information exchange

Where applicable, the College may exchange information with prescribed bodies under Chapter 16A of the Children and Young Persons (Care and Protection) Act 1998 where the statutory requirements are met and the information relates to the safety, welfare or wellbeing of a child or young person.

## 11.3 Records

The College will create accurate, contemporaneous records of child-safety concerns, disclosures, MRG outcomes, statutory reports, risk assessments, investigation steps, findings, communications and decisions. Records must be securely stored, access-controlled, retrievable and retained in accordance with applicable law, NESA requirements, OCG expectations and recognised child-safety recordkeeping principles.

# 12. Training, induction and awareness

The College will provide and document appropriate child-protection and child-safe training, including:

- induction before or at commencement;
- regular refresher training;
- mandatory reporting and use of the MRG;
- reportable conduct and professional boundaries;
- WWCC obligations relevant to role;
- responding to disclosures;
- online and physical child-safety risks;
- the College Code of Conduct and complaints pathways; and
- role-specific training for leaders responsible for investigations, risk management, records or statutory notifications.

# 13. Code of Conduct and professional boundaries

All workers must comply with the College Code of Conduct and maintain appropriate professional boundaries in person and online. The Code of Conduct must address child-safe interactions, communication, physical contact, one-to-one situations, transport, gifts/favouritism, photography and digital communication, social media, change rooms/toilets, excursions/camps and other foreseeable boundary risks.

In accordance with NESA's February 2026 registration requirements, the College's staff and responsible-person Codes of Conduct must expressly prohibit hate speech. This requirement should be maintained in the Code of Conduct and governance documents as well as reinforced through staff induction and training.

## 14. Complaints, concerns and accessibility

Students, parents, carers, staff and community members must be able to raise child-safety concerns without fear of retaliation. The College will maintain child-friendly and culturally responsive reporting options and will respond to concerns promptly.

A complaint may be made to the College without preventing or delaying a report to DCJ, NSW Police, the OCG or another regulator. The College's complaints process does not replace statutory reporting duties.

## 15. Related College policies and procedures

- Staff Code of Conduct / Professional Boundaries
- Student Wellbeing and Behaviour Management Policy
- Complaints Handling Policy
- Anti-Bullying Policy
- Work Health and Safety Policy
- Recruitment, Screening and WWCC Procedure
- Responding to Self-Harm and/or Suicidality Procedure
- ICT / Online Safety and Acceptable Use Policies
- Privacy and Records Management Policies
- Risk Management and Critical Incident Procedures

## 16. Review and compliance assurance

This policy will be reviewed at least annually and sooner where there is a relevant legislative amendment, regulator direction, OCG or DCJ guidance change, NESA registration update, critical incident, reportable-conduct matter, audit finding or identified gap in practice.

The Headmaster will ensure the Governing Council/Proprietor receives appropriate assurance that the policy is implemented in practice, including evidence of training, WWCC verification, child-safe risk management, reporting pathways, complaints accessibility, recordkeeping and continuous improvement.

## Appendix 1 – Quick response guide for staff

| Situation | Immediate action |
|---|---|
| **Immediate danger / serious injury / urgent threat** | Call 000. Ensure immediate safety. Notify the Headmaster/HRE as soon as possible. |
| **Suspected ROSH – child aged 0–15** | Notify a Wellbeing Coordinator/Headmaster promptly and use the MRG/professional judgement; where the threshold is met, the mandatory reporter must ensure a report is made to DCJ. Do not wait for internal approval or delay an urgent report. |
| **Serious concern – young person aged 16–17** | Notify a Wellbeing Coordinator, Counsellor/Psychologist or Headmaster/HRE and assess whether a voluntary DCJ report, Police contact, health response or other protective action is required. |
| **Allegation against employee/contractor/volunteer** | Immediately report to the Headmaster/HRE. A Wellbeing Coordinator may assist with escalation and student support. Do not investigate. The HRE assesses Police/DCJ and OCG obligations; OCG notification may be required within 7 business days. |
| Allegation involving Headmaster/HRE | Report immediately to the Chair of the College Governing Council/Proprietor or other formally authorised responsible person. |
| **WWCC becomes barred / interim barred / expired / invalid** | Remove the person from child-related work immediately and follow OCG requirements. |
| **Child disclosure** | Listen, reassure, do not promise secrecy, ask minimal open questions, record the child's words, and report promptly to a Wellbeing Coordinator/Headmaster. A counsellor or psychologist may support the child. Do not investigate. |

## Appendix 2 – Key contacts

| Contact | Details |
|---|---|
| **Emergency** | 000 |
| **NSW Child Protection Helpline** | 13 21 11 (24 hours, 7 days) |
| **ChildStory Reporter / Mandatory Reporter Guide** | https://reporter.childstory.nsw.gov.au/ |
| **Office of the Children's Guardian** | https://ocg.nsw.gov.au/ |
| **NSW Police** | 000 for emergencies; otherwise contact the relevant Police Area Command / Police Assistance Line as appropriate |
| **NESA – School Regulation** | https://www.nsw.gov.au/education-and-training/nesa/school-regulation |

## Legislative and regulatory references

- NSW Office of the Children's Guardian – Reportable Conduct Scheme, Head of Relevant Entity responsibilities, notification forms and WWCC employer guidance.
- NSW Department of Communities and Justice – Mandatory reporters, Mandatory Reporter Guide and Child Protection Helpline guidance.
- NSW Education Standards Authority – NSW Registered and Accredited Individual Non-government Schools Manual (February 2026) and Official Notice NESA 5/26.
- Children and Young Persons (Care and Protection) Act 1998 (NSW).
- Children's Guardian Act 2019 (NSW).
- Child Protection (Working with Children) Act 2012 (NSW).
- Crimes Act 1900 (NSW).