

# CHILD SAFETY AND CHILD ABUSE RESPONSE AND REPORTING (DLI) PROCEDURE

## Section 1 - Preamble

- (1) This Procedure is effective from 1<sup>st</sup> of December 2025.

## Section 2 - Purpose

- (2) This Procedure outlines the process that students, staff and University associates are required to follow when they have concerns about the safety or wellbeing of a person under the age of 18 ('child'), or when they form a reasonable belief that a child abuse incident has occurred.

## Section 3 - Scope

- (3) This Procedure applies to all students, staff and University associates at DLI.
- (4) The University will support students, staff and DLI associates to meet applicable reporting obligations related to child safety.
- (5) During the establishment of DLI, all policy, procedures and supporting processes will be regularly reviewed. In the establishment phase, defined as the first two years from when students commence DLI programs, any issues arising from the implementation of current policy, procedure or process will be referred to a jointly-convened Policy and Procedure Review Panel (PPRP). The PPRP will comprise designated academic and professional service representatives from the University Partners and the Office of the Rector. The PPRP will recommend an outcome best aligned with relevant principles and the best interests of any student(s) concerned, and will advise DLI on the future development of policy, procedure and supporting processes. During the establishment phase, the PPRP may make recommendations to vary any given policy only with endorsement from relevant University Partner governance processes. All policy and procedure will be subject to a full review at the end of the two-year establishment phase.

## Section 4 - Policy

- (6) This Procedure is pursuant to the Child Safety Policy.

## Section 5 - Procedure

### Child abuse reporting obligations

- (7) This Procedure includes information on how to report child abuse concerns within DLI and to external authorities. It does not supersede legislative reporting requirements and is intended to be complementary to those requirements.

### Identifying child abuse

- (8) Students, staff or university associates may have reasonable grounds for believing a child, who comes to the attention of a staff member, student or university associate in the course of their

employment, study or other connection to the University, is in need of protection or has disclosed a child abuse concern, including in any of the following circumstances:

- a. where there are reasonable concerns about significant harm to a child;
  - b. physical abuse of, or non-accidental or unexplained injury to, a child;
  - c. a disclosure of sexual abuse by a child or witness, or a combination of factors suggesting the likelihood of sexual abuse, such as the child exhibiting concerning behaviours;
  - d. emotional or psychological abuse and ill treatment of a child impacting on the child's stability and healthy development;
  - e. child exploitation; committing or coercing another person to commit an act or acts of abuse against a child/possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material/committing or coercing another person to commit an act or acts of grooming or online grooming/using a minor for profit, labour, sexual gratification, or some other personal or financial advantage;
  - f. persistent neglect, poor care or lack of appropriate supervision where there is a likelihood of significant harm to the child, or the child's stability and development;
  - g. persistent family violence or parental substance misuse, psychiatric illness or intellectual disability where there is a likelihood of significant harm to the child, or the child's stability and development;
  - h. where a child's actions or behaviour may place them at risk of significant harm and the parents or caregivers are unwilling, or unable to protect the child;
  - i. where a child appears to have been abandoned, or where the child's parents are dead or incapacitated and no other person is caring properly for the child;
  - j. grooming of a child;
- (9) Students, staff and university associates must respect confidentiality and comply with the Privacy (DLI) policy & the [Navitas Privacy Site](#) when dealing with suspected child abuse. Details of the case and the identity of the child and their family may only be discussed with those directly involved in the management of the child's situation and to meet the reporting obligations set out in this Procedure and in the legislation.

### **Reporting Obligations**

- (10) Under Law No. 23 of 2002 on Child Protection (as amended by Law No. 35 of 2014), all university staff, including lecturers, administrators, contractors, and volunteers, are legally and ethically required to protect children from abuse, neglect, exploitation, and violence. Article 54 of the law specifically mandates that children in educational settings, including those within university environments, must be safeguarded from acts of violence by teachers, staff, peers, and others. While Indonesian law does not explicitly impose a criminal penalty for failing to report suspected child abuse, it establishes a general duty for all university personnel to assist and refer cases to the appropriate authorities. Universities are expected to have clear internal procedures for reporting and responding to concerns regarding child safety, ensuring that any reasonable suspicion of harm to a child is promptly addressed.

### **Reporting child abuse concerns**

- (11) In a situation of grave and immediate life-threatening risk to a child, staff, students, and associates must notify local police immediately by telephone on 110 or contact the nearest police station.

- (12) If there is a risk to the immediate safety of a child (non-life-threatening), staff, students, or associates should immediately report the concern to the local police or to the Integrated Child Welfare Services (Lembaga Perlindungan Anak or LPA) in their area. If available, they may also contact the National Commission for Child Protection (Komisi Nasional Perlindungan Anak or KPAI). If the risk is occurring on campus, they should also notify university security or the Chief Operating Officer (DLI.COO@dli.ac.id).
- (13) If the incident relates to a student, staff member, or university associate, or arises in the course of employment, study, or other connection to the University, contact the DLI Child Safety Officer. The DLI Child Safety Officer will confirm details of the child safety concern.
- (14) Staff and associates are required to notify the DLI Child Safety Officer immediately after forming a reasonable belief that a member of the University has engaged in alleged child abuse.
- (15) Allegations of child abuse may also be made by persons external to the University, in the manner described above.
- (16) Where a notification has been made to the DLI Child Safety Officer concerning a student, staff or associate, the DLI Child Safety Officer may be required to make a report to relevant authorities, in line with legislative reporting obligations.
- (17) Where the DLI Child Safety Officer has been made aware of an instance of child abuse or has a reasonable belief that child abuse has occurred, they are required to notify relevant representatives at Deakin University and/or Lancaster University.

**How to seek support**

- (18) Staff may seek support from their manager or supervisor in reporting their child abuse concern or from the DLI Child Safety Officer.
- (19) Students, staff or associates who are aged under 18 years and are concerned about their own safety are encouraged to seek help and support by contacting the DLI Child Safety Officer.

**Section 6 - Definitions**

- (20) In addition to the definitions contained in the Child Safety Policy:
  - a. immediately (for the purposes of notification in clause 13) means as soon as reasonably practicable, within a period of 24 hours or if after hours, the next business day.
  - b. reasonable belief refers to a belief that a child has been abused based on evidence or observations that would lead a reasonable person in the same situation to reach the same conclusion.

**ASSOCIATED DOCUMENTS**

- (21) Associated documents are available on the [DLI Policy page](#).

PROCEDURE DETAIL	
<b>Name of procedure</b>	Child Safety Reporting Procedure
<b>Overarching policy</b>	Child Safety Policy
<b>Approved by</b>	Yayasan Governing Board

<b>Approval date</b>	27 <sup>th</sup> November 2025
<b>Date of effect</b>	1st December 2025
<b>Date of review</b>	1st December 2026
<b>Responsible Executive</b>	Rector
<b>Implementation Officer</b>	COO
<b>Policy or procedure superseded</b>	N/A
<b>Associated documents</b>	<p>Law No. 23 of 2002 on Child Protection as amended by Law No. 35/2014 (Law No. 23/2002)</p> <p>MoECRT Reg No. 55/2024</p> <p>Article 330 of the Civil Code</p> <p>Law No. 1 of 1974 on Marriage Law as amended by Law No. 16 of 2019 (Law No. 1/1974)</p> <p>Government Regulation No. 78 of 2021 on Special Protection for Children (GR No. 78/2021)</p>
<b>Summary</b>	This Procedure outlines the process that students, staff and University associates are required to follow when they have concerns about the safety of a person under the age of 18 ('child') or the reasonable belief that a child abuse incident has occurred.
<b>Key words for online searching</b>	Child abuse, child safety, child abuse reporting
<b>Category</b>	University governance
<b>Target audience</b>	Students, staff, associates