# Child Protection Risk Management Strategy

## 1. Purpose

The purpose of this strategy is to eliminate and minimise risk to student safety to ensure the safety and wellbeing of all students.

## 2. Scope

Students and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements.

## 3. References

*Working with Children (Risk Management and Screening) Act 2000 (Qld)*
*Working with Children (Risk Management and Screening) Regulation 2020 (Qld)*
*Child Protection Act 1999 (Qld)*
*Education (Accreditation of Non-State Schools) Act 2017 (Qld)*
*Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)*
*Education (General Provisions) Act 2006 (Qld)*
*Education (General Provisions) Regulation 2017 (Qld)*
*Education Services for Overseas Students (ESOS) Act 2000 (Cth)*
*Education (Overseas Students) Regulation 2014 (Qld)*
*Education (Queensland College of Teachers) Act 2005 (Qld)*
*Education and Care Services National Law (Queensland)*
*Education and Care Services National Regulations*
*Criminal Code Act 1899 (Qld)*
Blue Card Services *Child and Youth Risk Management Strategy Toolkit*
*Restricted Person Declaration Form*

## 4. Related Documents

*Emmanuel College Blue Card Policy*
*Blue Card - Restricted Person Declaration Form*
*Emmanuel College Child Protection Policy*
*Emmanuel College Formal Complaints Policy*
*Emmanuel College Child Protection- Professional Boundaries Policy*
*Emmanuel College Risk Management Framework*

## 5. Review

This strategy will be reviewed at least annually.

## 6. Statement of Commitment

Emmanuel College is committed to taking all reasonable steps to promote the safety and wellbeing of students enrolled at the College and their protection from foreseeable harm. [1] In practice, the College is committed to acting in accordance to the *Working with Children (Risk Management and Screening) Act 2000 (Qld)*("**the Act**") to promote the safety and wellbeing of students means that it will implement the measures outlined below in points.

## 7. Code of Conduct

At Emmanuel College we expect our employees to conduct themselves as follows:

School employees are expected to always behave in ways that promote the safety, welfare and wellbeing of our students. Employees must actively seek to prevent harm to students, and to support those who have been harmed.

Specific responsibilities include:

- Employees should avoid situations where they are alone in an enclosed space with a student.
- When physical contact with a student is a necessary part of the teaching/learning experience, employees must exercise caution to ensure that the contact is appropriate and acceptable. Employees must always advise the student of what they intend doing and seek their consent.
- Employees must not develop a relationship with any student that is, or that can be interpreted as having a personal rather than a professional interest in a student.
- Employees must not have a romantic or sexual relationship with a student.

This commitment is evidence of the College's fulfilment of the requirements of Schedule 1 s.2(2).

## 8. Recruitment, Selection, Training and Management Procedures

Emmanuel College is committed to recruiting, selecting, training and managing employees in such a way that limits risks to students. In particular, the College will:

- Ensure that its recruitment and selection procedures act to reduce the risk of harm to children from employees via:
  - (i) Accurate position descriptions, including whether the successful applicant must be a teacher registered with the Queensland College of Teachers (who has been subject to relevant police and other safety checks), whether a Blue Card is necessary for the successful applicant, the responsibilities and supervision associated with the position, the nature and environment of the service provided to students, and the experience and qualifications required by the successful applicant.
  - (ii) Advertising the position with a clear statement about the school's commitment to safe and supportive work practices and identifying that candidates will be subject to a teacher registration check or Blue Card screening, a police check, referee checks, identification verification and the requirement to disclose any information relevant to the candidates' eligibility to engage in activities including children.

[1] *Working with Children (Risk Management and Screening) Regulation 2020 (Qld) sch 1 s.2(1)*

(iii) A selection process that includes assessing the application via an interview process and referee and other checks (as identified above) based on the accurate position description.
(iv) A probationary period of employment, which allows the school to further assess the suitability of the new employee and to act as a check on the selection process.

- Ensure that its training and management procedures act to reduce the risk of harm to students from employees via:
  (i) Management processes that are consistent, fair and supportive.
  (ii) Performance management processes to help employees to improve their performance in a positive manner.
  (iii) Supportive processes for staff when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training, and external support and counselling services.
  (iv) An induction program which thoroughly addresses the school's policies and procedures, particularly its expectations regarding student risk management and to assist employees to understand their role in providing a safe and supportive environment for students.
  (v) Training new and existing staff on an ongoing basis to enhance skills and knowledge and to reduce exposure to risks, as follows:
    - the school's policies and procedures
    - identifying, assessing and minimising risks to students
    - handling a disclosure or suspicion of harm to a child.
  (vi) Keeping a record of the training provided to employees.
  (vii) Exit interviews to assist the school to identify broader issues of concern that may impact on the safety and wellbeing of students at the school.

This commitment is evidence of Emmanuel College's fulfilment of the requirements of Schedule 1 s.2(3).

## 9. Handling Disclosures or Suspicions of Harm

Any of the types of concerns or reports below should be reported and managed under the Emmanuel College Child Protection Policy as follows:

- all staff with concerns about sexual abuse or likely sexual abuse or a child sexual offence committed by an adult
- teachers, nurses and early childhood education and care professionals with concerns of sexual or physical abuse
- all staff who have received a report of inappropriate behaviour by another staff member.

To report any type of harm, all staff members should use the Report of Suspected Harm or Sexual Abuse Form in Appendix 2 of this document.

Furthermore, and in accordance with section 76 of *the Education (Queensland College of Teachers) Act 2005*, the Principal of Emmanuel College will report to the Queensland College of Teachers any investigations into allegations of harm caused, or likely to be caused, to a student because of the conduct of a relevant teacher at the school.

Any report made under this section or the Emmanuel College Child Protection Policy will fulfil the reporting obligations of all adults under the *Criminal Code Act 1899*.

This commitment is evidence of Emmanuel College's fulfilment of the requirements of Schedule 1 s.2(4).

## 10. Managing Breaches of this Child Protection Risk Management Strategy

Emmanuel College is committed to appropriately managing breaches of this Child Protection Risk Management Strategy in accordance with its other relevant policies as appropriate in the circumstances, such as its Child Protection Policy, Code of Conduct For Staff/Student Interaction , Formal Complaints Policy and Enterprise Agreement and this is evidence of fulfilment of the requirements of Schedule 1 s.2(5).

## 11. Implementing and Reviewing the Child Protection Risk Management Strategy

This Strategy in its entirety and its related policies and procedures are evidence of fulfilment of the requirements of Schedule 1 s.2(6)(a) relating to implementation.

The introduction to this Child Protection Risk Management Strategy and the "Compliance and Monitoring" section below state Emmanuel College's commitment to reviewing the Strategy annually and are evidence of fulfilment of the requirements of the Schedule 1 s.2(6)(a) relating to review.

## 12. Blue Card Policies and Procedures

Emmanuel College is committed to acting in accordance with chapters 7 and 8 of the Act relating to the screening of employees in such a way that limits risks to children. As per our Blue Card Policy Emmanuel College will:

- Require relevant prospective or current employees, volunteers, trainee students and school board members to have working with children authority, and check the validity and appropriateness of any currently held notices, in accordance with the College's position descriptions and the Act prior to the commencement of their engagement.
- Not allow a person to continue to work with children if their working with child authority is cancelled or suspended or a negative notice is received after a change of police information.
- Have all relevant prospective employees and volunteers engaging in Restricted Employment acknowledge and sign a Blue Card Restricted Person Declaration Form declaring they are not a restricted person prior to commencing their engagement.
- Not allow a person relying on an exemption to continue to work with children if they become a restricted person.
- Link and unlink individuals as they commence and conclude their engagement with the school.
- Appoint a school contact person who will be responsible for managing the working with child screening process and all related documentation and records.
- Keep written records of all the above actions, decisions and outcomes, including the dates of expiry for working with children authority.
- Ensure that all information in relation to working with children authority is kept confidential.
- Act to remind employees to keep their working with children authority up to date and apply for a renewal prior to expiry.

- Take appropriate action if an employee, volunteer, trainee student or school board member fails to submit a renewal application prior to their working with children authority expiring.

This commitment is evidence of the College's fulfilment of the requirements of Schedule 1 s.2(6)(b).

## 13. High Risk Management Plans

Emmanuel College is committed to identifying risks, assessing risks, eliminating and minimising risks and the monitoring of risk to the safety of students on an ongoing basis as specified in the Risk Management Framework. Emmanuel College will utilise various risk management tools to assist it in this process and will keep appropriate records of decisions made and actions taken in relation to risks to children. This commitment is evidence of the College's fulfilment of the requirements of Schedule 1 s.2(7).

## 14. Strategies of Communication and Support

Emmanuel College's commitment to making this Child Protection Risk Management Strategy available to students, parents and employees via its website, school intranet site (Schoolbox) and employment packages is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(a).

Emmanuel College is committed to training employees in relation to risks to students and will conduct this training regularly via annual formal training events, informal updates at staff meetings and new employee inductions and this is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(b).

**a) Responsibilities**

Emmanuel College is responsible for developing and implementing this Child Protection Risk Management Strategy and related policies and procedures to ensure it fulfils its obligations. All students, employees, contractors, volunteers and people undertaking work experience or vocational placements at the College are responsible for acting in compliance with this Child Protection Risk Management Strategy and related policies and procedures.

**b) Compliance and Monitoring**

Emmanuel College is committed to the annual review of this Strategy. The College will also record, monitor and report to the College Board, the Executive Team and others as appropriate regarding any breaches of the Strategy. In addition, Emmanuel College is committed to other various compliance and monitoring arrangements made under relevant policies and procedures.

**c) Helpful Links**

- Independent Schools Queensland's Child Protection Decision Support Trees
- Department of Families, Seniors, Disability Services and Child Safety Child Protection Guide resource
- Blue Card Services resources

## Appendix 1 – Summary of Reporting Harm

| Who | What Abuse | Test | Report to | Legislation |
|---|---|---|---|---|
| **All staff** | Sexual or likely sexual | Awareness or a suspicion sexually abused or likely to be sexually abused | Principal or the Designated Director of the College Board immediately, through to police immediately | EGPA sections 366 and 366A |
| **Principal** | Sexual or likely sexual | Awareness or a suspicion sexually abused or likely to be sexually abused | The Designated Director of the College Board immediately, through to police immediately | EGPA sections 366 and 366A |
| **Teacher / Nurse** | Sexual and Physical | Significant harm - Parent may not be willing and able | Confer with principal, report to Child Safety | CPA sections 13E and 13G |
| **All staff** | Physical, psychological, emotional, neglect, exploitation | Significant harm - Parent may not be willing and able | Principal, through to Child Safety | Accreditation Regulations section 16 |
| **All staff** | Any | Not a level that is otherwise reportable to Child Safety, refer with consent | Principal, through to Family and Child Connect | CPA Sections 13B and 159M |
| **Principal** | Any | Not a level that is otherwise reportable to Child Safety, refer without consent | Family and Child Connect | CPA Sections 13B and 159M |
| **Any member of the public** | Any | Significant harm - Parent may not be willing and able | Child Safety | CPA section 13A |
| **Any adult (includes students 18 years or older, parents/guardians and volunteers)** | A child sexual offence against a child by another adult | Gains information that causes the adult to believe on reasonable grounds, or ought reasonably to cause the adult to believe, that: (a) child sexual offence is being or has been committed, and (b) at the relevant time, the child is or was: (i) under 16 years; or (ii) a person with an impairment of the mind. | Police | Criminal Code section 229BC |

## Appendix 2 – Report of Suspected Harm or Sexual Abuse Form

**Private and Confidential Report of Suspected Harm or Sexual Abuse**

| | |
|---|---|
| Date: | College: |
| College Phone: | College email: |

**Details of Student/Child Harmed or At Risk of Harm/Abuse**

| | |
|---|---|
| Legal Name: | Preferred Name: |
| DOB: | Sex Description: |
| Year Level: | Cultural Background: |
| Primary language spoken: | |
| ☐ Aboriginal ☐ Torres Strait Islander ☐ Aboriginal and Torres Strait Islander | |
| Does the student have a disability verified under EAP: ☐ Yes ☐ No | |
| Disability Category: | |
| Student's residential address: | |
| Student's phone: | |
| Student's personal mobile & email address: | |

**Family Details**

| | |
|---|---|
| Parent/caregiver 1: | Relationship to Student: |
| Address (if different from student): | |
| Phone: | |
| Parent/caregiver 2: | Relationship to Student: |
| Address (if different from student): | |
| Phone: | |
| Is the student in out of home care? ☐ Yes ☐ No | |
| Are there any Family Court or Domestic Violence orders in place? ☐ Yes ☐ No ☐ Unknown | |

**Person alleged to have caused the harm or abuse**

☐ Adult family member ☐ Child family member ☐ Other adult
☐ Student/other child ☐ Unknown ☐ Staff member or contractor

**Provide all information you have which led to the suspicion of harm or abuse** (Attach extra pages if necessary). **Details of any harm and/or sexual abuse to the student** – please include: Time and date of the incident; location of the incident, source of information; details of person alleged to have caused the harm or sexual abuse; physical appearance of any injury; immediate and ongoing safety concerns; any disclosures made by student; any previous incidents of harm; behavioural indicators of harm; presence of any medical needs or developmental delays; and if the information relates to an unborn child, the alleged risk to the unborn child.

**Please indicate the identity of anyone else who may have information about the harm or abuse**

**Additional information provided as an attachment** ☐ Yes ☐ No

**Name of staff member making report, if not the Principal:**

**Position:** **Signature:** **Date:**

**Principal:** **Signature:** **Date:**

**Response requested by College:**

**Action Taken**

☐ Department of Families, Seniors, Disability Services and Child Safety
☐ Family and Child Connect
☐ Director of Professional Standards QCT

*Adapted from EQ SP-4 Report of Suspected Harm or Risk of Harm)*
Confirm receipt of emailed form and ensure original is stored in a secure location along with any other documentation collected for the purpose of this report.