



St Paul's School

& EARLY LEARNING CENTRE

Child & Youth Risk Management Strategy

2023



create your own story!

Contents

QUICK LINKS		
Queensland Government Child Protection Guide Decision Making Tool		
https://secure.communities.qld.gov.au/cpguide/engine.aspx		
Form 4: SPS Report of Harm or Concerning Behaviour	Read it here	Download it here
ASC Protection Form	Read it here	Download it here

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Section 1

Introduction

"The True character of a society is revealed in how it treats its children"

(Nelson Mandela 1997)

Safe environments for children don't just happen. They require ongoing planning, commitment and maintenance.

The St Paul's School and Early Learning Centre Child and Youth Risk Management Strategy helps us provide and nurture an environment that supports the wellbeing of our students and protects them from harm.

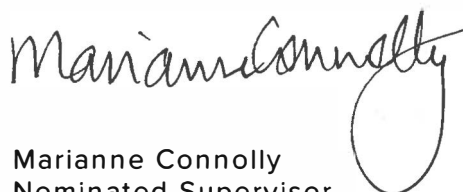
It provides information, resources, and contacts to guide you. We also hope it encourages discussion; child protection is everyone's responsibility. If there are ways you would like to see this Strategy develop, we welcome your feedback.



Dr. Paul Browning
Headmaster



Rev. David Ruthven
Chair
School Council



Marianne Connolly
Nominated Supervisor
St Paul's Early Learning
Centre

Section 2

About

Purpose

The purpose of the St Paul's School and Early Learning Centre Child and Youth Risk Management Strategy is to implement practices and procedures that:

- support the wellbeing of children; and
- protect children from harm.

Having a Child and Youth Risk Management Strategy is a requirement of the *Working with Children (Risk Management and Screening) Act 2000*¹.

Scope

The following types of regulated business² and employment³ are within the scope of our Child and Youth Risk Management Strategy:

Regulated Businesses	
1	Education and care services and similar businesses
2	Non-State schools

Regulated Employment	
1	Schools—employees other than teachers and parents
2	Education and care services and similar employment
3	Churches, clubs and associations involving children
4	Health, counselling and support services
5	Child accommodation services including home stays
6	Religious representatives
7	Sport and active recreation

¹ Working with Children (Risk Management and Screening) Act 2000, Ch7, Part 3, Section 171 and 173 [here](#)

² The Working with Children (Risk Management and Screening) Act 2000 defines Employment in Ch1, Part 2, Section 10 [here](#)

³ The Working with Children (Risk Management and Screening) Act 2000 defines Regulated Employment and Business in Ch7, Part 1, Section 156 [here](#). The Act details types of Regulated Employment and Business in Schedule 1, Part 1 [here](#).

Key Roles and Responsibilities

Whilst everyone engaged by St Paul's School and Early Learning Centre has a role and responsibility to keep our children safe, below are some of the key positions involved in delivering our Child and Youth Risk Management Strategy:

Position	Responsibility
Headmaster	<ul style="list-style-type: none">• Overall responsibility for delivering the Purpose of the Child and Youth Risk Management Strategy.• Meet obligations associated with the regulated employment undertaken by a person engaged, or any regulated business owned or controlled by the school.• Approve the CYRMS and any changes following review.
School Council	<ul style="list-style-type: none">• Endorse the Child and Youth Risk Management Strategy and any changes following review
Risk and Compliance Committee	<ul style="list-style-type: none">• Support and advise the Headmaster on the delivery of the Child and Youth Risk Management Strategy.• Conduct an annual review of the Child and Youth Risk Management Strategy in accordance with the Cyclical Calendar.• Recommend the endorsement of the Child and Youth Risk Management Strategy to the School Council in accordance with the Cyclical Calendar.
Child and Youth Risk Management Committee	<ul style="list-style-type: none">• Assist the Headmaster in the implementation of the Child and Youth Risk Management Strategy
Director of Junior School	<ul style="list-style-type: none">• Implement the Child and Youth Risk Management Strategy in the Early Learning Centre
Homestay Coordinator	<ul style="list-style-type: none">• Implement the Child and Youth Risk Management Strategy in the St Paul's Homestay program.
Risk and Compliance Officer	<ul style="list-style-type: none">• Lead the production, review and dissemination of the Child and Youth Risk Management Strategy.• Assist the Chair of the Child and Youth Risk Management Committee

You can ask to speak to any of these people by:

- Calling 07 3261 1388

Or

- Emailing enquiries@stpauls.qld.edu.au including the words child-protection in your subject line

Child and Youth Risk Management Committee

The development, implementation, monitoring and review of our Child and Youth Risk Management Strategy is assisted by the Child and Youth Risk Management

Committee. Membership of this Committee has been chosen because it represents the variety of contexts that the Child and Youth Risk Management Strategy relates to. The diversity of the Committee also facilitates collaboration with a range of stakeholders from within these contexts, including children, young people, parents, staff and volunteers. The St Paul's School and Early Learning Centre Child and Youth Risk Management Committee members are:

Name	Position	Committee Role
N. Grant	Executive Director of Faith and Community	Chair
M. Barratt	Risk & Compliance Officer	Secretary
L. Bolger	House Leader	
M. Connolly	Director of Junior School and Student Protection Officer	
D. Fenwick	House Leader	
K. Green	Head of Extra-Curricular Music	
C. Howes	Head of Experiential Learning	
S. Hughes	House Leader	
T. Hughes	Student Protection Officer	
E. Trudgian	House Leader	
M. Leam	Chaplain	
C. Litherland	Head of Sport Development	
A. Pashen	Counsellor and Student Protection Officer	
K. Power	Director of International Education	
K. Semple	Counsellor and Student Protection Officer	
S. Sutherland	Homestay Coordinator and Student Protection Officer	
C. Wegener	Educational Leader St Paul's Early Learning Centre	
N. White	House Leader	

Annex A contains the Terms of Reference for the Child and Youth Risk Management Committee

Monitoring and Review

Monitoring risks to children is the responsibility of all people engaged by St Paul's School and Early Learning Centre. St Paul's School and Early Learning Centre enables this through:

- Communication and Support (See Section 4)
- Recruitment, Selection, Training and Management (See Section 6)

Formal Monitoring

Our Child and Youth Risk Management Strategy is monitored by the Child and Youth Risk Management Committee. This Committee reports to the Headmaster quarterly.

Review

Our Child and Youth Risk Management Strategy is reviewed annually⁴. The stages of our review process are:

Stage	Activity	Timeframe
1	Request for comments on the School eNews	June
	Request for feedback from the Student Wellbeing Committee	
	Request for feedback from staff	
2	Reviewed by the Child and Youth Risk Management Committee	July
3	Presented to the Headmaster for comment	August
4	Presented to the Risk and Compliance Committee for comment	October
5	Presented to the School Council for endorsement	November
6	Published	January

The Secretary of the Child and Youth Risk Management Committee leads the review process.

Feedback

We welcome feedback on our Child and Youth Risk Management Strategy at any time of the year. If you would like to comment, there is a feedback form in Section 11.

Distribution

The Child and Youth Risk Management Strategy is our cornerstone Student Protection document. It is widely available and easily accessible.

Source	Location
Website	https://www.stpauls.qld.edu.au/student-protection/
Intranet	https://stpaulsqld.cspace.net.au/ChildProtection
Hard Copies	Headmaster
	Director of Junior School
	Chair Child and Youth Risk Management Committee
	Student Protection Officers
	Chaplain
	Risk and Compliance Officer
	Early Learning Centre
	International School
	Library

Where to get support

⁴ In accordance with the Working with Children (Risk Management and Screening) Act 2000, Ch7, Part 3, Section 171 [here](#).

We understand that speaking out when you see or suspect a child is being harmed takes courage. We're here to help, guide and support you. Regardless of your role in our community, you can find support here. We have members of staff especially trained in child protection matters. They are experienced, compassionate and approachable. Any member of School staff will be able to guide you to them.

If you're uncomfortable talking to a member of School staff, then you can get in touch with Child Safety on 1300 682 254 (9.00am – 5.00pm) or 1800 177 135 (after hours).

Being involved in a child protection matter can be distressing and stressful. There is support available to you from:

- Lifeline on **13 11 14**
- Kids Helpline on **1800 55 1800**
- The Employee Assistance Program (for staff)
- Or our School Counsellors on **07 3261 1388**

Glossary of Terms

ELC	Early Learning Centre
CYRMS	Child and Youth Risk Management Strategy
CYRM	Child and Youth Risk Management Committee
School, Our and We	All refer to St Paul's School and Early Learning Centre
SPO	Student Protection Officer

Section 3

Statement of Commitment

This is our Statement of Commitment to the safety and wellbeing of children and to the protection of children from harm. It seeks to provide a foundation to reflect, encourage and support a child-safe culture. We require Our Statement of Commitment to be implemented by everyone within the St Paul's School and Early Learning Centre community.

St Paul's School and Early Learning Centre is committed to providing environments where children and young people receive the highest standard of care, where their rights are supported, and they have opportunity to thrive and be fruitful. Such environments nurture and safeguard the intelligence, dignity, safety and wellbeing of each child or young person, by placing them at the centre of thought, values and actions.

As reflected in our Ethos, our vocation is education, driven by a vision of humanity, shaped by the image of God made visible in Jesus, present in every human being.

- Every child: made in the image and likeness of God.
- Every child: loveable and loved, unique and unrepeatable.
- Outstanding education for the flourishing of people and the good of community.

Our faith is lived. We are a hospitable and welcoming community, we embody compassion, kindness, fairness, justice and love, and where exceptional pastoral care is practiced.

Working and serving the best interests of children and young people is in everyone's best interest. This is achieved through sustaining living and learning environments that are safe, supportive and stimulating. Specifically, we:

- place emphasis on genuine engagement with children and young people;
- create conditions that reduce the likelihood of harm to children and young people;
- create conditions that increase the likelihood of identifying harm where it exists; and
- respond swiftly and appropriately to any concerns, disclosures, allegations or suspicions.

This commitment is sought to be consistently reflected through the decisions and behaviour of all persons within our School and Early Learning Centre, who are guided by effective governance, policies, tools and processes. This fosters a child safe culture, where acting in children and young people's best interests is at the heart of what we do.

How We Implement Our Statement of Commitment

Our Statement of Commitment can be found in the following places

Source	Location
Website	https://www.stpauls.qld.edu.au/student-protection/
Intranet	https://stpaulsqld.cspace.net.au/ChildProtection
Hard Copies (within our CYRMS)	Headmaster
	Director of Junior School
	Chair Child and Youth Risk Management Committee
	Student Protection Officers
	Chaplain
	Risk and Compliance Officer
	Early Learning Centre
	International School
	Library
Hard Copies (places other than our CYRMS)	Tooth Reception
	Retail Shop
	Junior School Reception
	Krebs Reception
	Wellbeing Reception
	Early Learning Centre

And in the following publications

Publication
The St Paul's School and Early Learning Centre Child and Youth Risk Management Strategy (this document)
Working With Children in Anglican Education Guidelines and Procedures

We publicly communicate our commitment to child safety by making our Statement of Commitment available on our website and through the actions and behaviours modelled by our community. These actions and behaviours derive from a blend of training, process, judgement, and experience. This blend enables us to champion a child-safe culture across our community.

In situations where our Statement of Commitment is not upheld, we have well-established child-safety, performance and disciplinary processes in place. Section 8 provides more detail.

Section 4

Code of Conduct

Definition

St Paul's School and Early Learning Centre has adopted the Anglican Schools Commission publication; *Our Commitment: Creating environments for children and young people to thrive (Code of Conduct for Anglican Schools and Education & Care Services)*. We refer to this publication as the Code of Conduct.

Implementation

St Paul's School and Early Learning Centre follows a Code of Conduct for interacting with children and young people. We communicate this Code of Conduct to our community in the following ways:

User Group	How Does This User Group Understand the Expectation?
Public	The availability of the Code of Conduct on our website allows the public to understand expected conduct when interacting with children and young people at St Paul's School and early Learning Centre.
Volunteer and Homestay Community	The Code of Conduct is provided as part of our induction materials. Understanding is agreed and signed to in an Acknowledgment of Understanding. Understanding can be reaffirmed by accessing the Code of Conduct through our website.
Staff Community	The Code of Conduct is provided as part of our induction materials. Understanding is agreed and signed to in an Acknowledgment of Understanding. Understanding can be reaffirmed by accessing the Code of Conduct through Policy Plus
Parent Community	The availability of the Code of Conduct on our website and Parent lounge allows our parents to understand expected conduct when interacting with children and young people at St Paul's School and early Learning Centre.
Student Community	The availability of the Code of Conduct on our website and Student Cafe allows our students to understand the expected conduct of adults that interact with them at St Paul's School and early Learning Centre.

Distribution

Our Code of Conduct can be found at Appendix 1

Managing Breaches

Breaches of the Code of Conduct are managed in accordance with Section 8 of this Child and Youth Risk Management Strategy: Managing Breaches.

Section 5

Handling Disclosures or Suspicions of Harm

Implementation

A critical part of our Child and Youth Risk Management Strategy is how we handle disclosures of harm or suspicions of harm. St Paul's School and Early Learning Centre implements the following policies and procedures for the handling of disclosures or suspicions of harm to children and young people:

Reference Document	Location
Protecting Children and Young People in Anglican Education - Policy	Appendix 2
Protecting Children and Young People in Anglican Education - Procedures	Appendix 3

Disclosures or suspicions of harm can be addressed by any person using the procedures above. St Paul's School and Early Learning Centre has Student Protection Officers to guide individuals through the handling of disclosures and suspicions of harm.

Managing Breaches

Procedures for managing concerns that the policies or procedures detailed in this Child and Youth Risk Management Strategy have not been followed can be found in Section 8 – Managing Breaches.

Communication

Policies and procedures for handling disclosures or suspicions of harm are contained within this document. This document is widely available in accordance with the distribution list in Section 1 - About

In addition to this document, actions about how to handle disclosures or suspicions of harm can be found in the following:

Reference Document	Location
Student Protection Officer posters	Annex B Tooth Reception Junior School Reception International School Reception Wellbeing Reception Walker Centre Reception Library Tuckshop
School website student protection page	https://www.stpauls.qld.edu.au/student-protection/
St Paul's School and Early Learning Centre Induction documents	Risk and Compliance Officer Manager of Operations

Child Protection Training for Anglican Schools and ECS	Online through CompliLearn
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Support

Support and guidance to implement procedures about disclosure or suspicions of harm is available through our Student Protection Officers. They are experienced, compassionate and approachable. Should you have to handle a disclosure of harm or a suspicion of harm, our Student Protection Officers can assist and guide you. These are the Student Protection Officers at St Paul's School and Early Learning Centre:



Marianne Connolly

Director Of Junior School
Nominated Supervisor ELC

Junior School

m.connolly@stpauls.qld.edu.au
3261 1388



Kellee Green

Head of Extra-Curricular Music

Music Centre

k.green@stpauls.qld.edu.au
3261 1388



Tim Hughes

Teacher

Farmhouse

t.hughes@stpauls.qld.edu.au
3261 1388



Amanda Pashen

School Counsellor

Wellbeing Centre

a.pashen@stpauls.qld.edu.au
3261 1388



Karen Semple

School Counsellor

Wellbeing Centre

k.semples@stpauls.qld.edu.au
3261 1388



Sharon Sutherland

Homestay Coordinator

Sutton Building

s.sutherland@stpauls.qld.edu.au
3261 1388

Details of their appointment can be found at Annex C.

Section 6

Recruitment, Selection, Training And Management

Part 1 – Recruitment and Selection

Safeguarding is ingrained in our processes from the moment we consider engaging someone. Throughout our recruitment and selection processes we draw on these references:

References	Location
Working with Children in Anglican Education, Appendix 1: Advice on screening requirements	Appendix 4
Recruitment and Selection in Anglican Schools	Appendix 5
PRO-034 Recruitment, Selection and Appointment Procedures (login required)	https://stpaulsqld.cspace.net.au/Assets/1683/2/PRO-034RecruitmentSelectionandAppointmentProcedureStaffV21.pdf

Within St Paul's School and Early Learning Centre, child protection messaging, expectations and training reach our varied user groups in the following ways:

User Group	Sub-Group	Processes and Procedures (Login Required)
Homestay	Families	<ul style="list-style-type: none">• Homestay Family – New Student Checklist• Homestay Family Inspection Checklist• Homestay Induction Checklist• Homestay Reference Check 2021• Information Handbook for Homestay Families• Homestay Family - New Student Checklist• New Student Homestay Placement – Coordinator Checklist
	Students	<ul style="list-style-type: none">• Student Homestay Handbook• Homestay Student Contract• Homestay Student Check-in
Volunteers	School Council	<ul style="list-style-type: none">• School Council nomination form
	Sports Coaches	<ul style="list-style-type: none">• Sports Coach inductions
	Association & Supporter Groups	Blue Card and Induction Guidelines for Volunteers
Staff	Permanent	Request access from the EA to the Headmaster
	Contract	
	Supply	Interview and Induction Form

Part 2 – Training and Management

St Paul's School and Early Learning Centre has a comprehensive child protection training program for the varied user groups in our community.

Our Compliance Training Policy draws on the publications below to train and manage people engaged by us in child protection matters

These training requirements can be found at Annex D.

References	Location
Code of Conduct	Appendix 1
Protecting Children and Young People in Anglican Education – Procedures (Section 18)	Appendix 2
POL-098 Compliance Training Policy	Annex D
ASC annual refresher training	Access via CompliLearn
St Paul's School and Early Learning Centre Induction – Volunteer	Request access from R&C Officer
St Paul's School and Early Learning Centre Induction – Pre-Service Teacher	Request access from R&C Officer
St Paul's School and Early Learning Centre Induction – Associate Staff	Request access from R&C Officer

Section 7

Written Records of Engaged Persons

Implementation

We comply with the Working with Children (Risk Management and Screening) Act by keeping a written record of matters about all persons engaged by St Paul's School and Early Learning Centre.

We do this using the St Paul's School and Early Learning Centre Blue Card Register. Our policy on Blue Card matters can be found at Annex E.

References	Location
Working with Children in Anglican Education, Appendix 1: Advice on screening requirements	Appendix 4
Recruitment and Selection in Anglican Schools	Appendix 5
POL-096 Blue Card Policy and Procedure (login required)	Annex E

Section 8

Communication and Support

Implementation

St Paul's School and Early Learning Centre communicates and provides support about our Child and Youth Risk Management Strategy in a variety of ways: to people in our community about child and youth risk management:

- Within this document, there are references to how we communicate and provide support for different sections of our Child and Youth Risk Management Strategy.
- For the Child and Youth Risk Management Strategy as a whole, we take the following actions to ensure it is communicated and that support is available:

Actions	Lead
Distribute our Child and Youth Risk Management Strategy in accordance with the distribution list in Section 1	Risk and Compliance Officer
Include contact details in our Child and Youth Risk Management Strategy for support	Risk and Compliance Officer
Conduct termly Child and Youth Risk Management Committee meetings	Chair Child and Youth Risk Management Committee
Distribute St Paul's School and Early Learning Centre induction material	Risk and Compliance Officer Director of Junior School
Distribute Anglican Schools Commission Child Protection training material	Risk and Compliance Officer

Section 9

Managing Breaches

Implementation

The integrity of our Child and Youth Risk Management Strategy can only be maintained if we have a plan for how we manage actions or inactions that breach it. Breaches of our Child and Youth Risk Management Strategy follow specific complaints and performance management processes. These processes are designed to maintain the integrity of our Child and Youth Risk Management Strategy and bring about an equitable resolution.

Reference Publications

Publication	Source
Complaints Management in Anglican Schools Policy V2.0	https://www.stpauls.qld.edu.au/wp-content/uploads/2019/01/Complaints-Management-in-Anglican-Schools-Policy-V2.0.pdf
Complaints Management in Anglican Schools Procedures V2.0	https://www.stpauls.qld.edu.au/wp-content/uploads/2019/01/Complaints-Management-in-Anglican-Schools-Procedures-V2.0.pdf
Complaints Management in Anglican Education & Care Services Policy V2.0	https://www.stpauls.qld.edu.au/wp-content/uploads/2019/01/Complaints-Management-in-Anglican-Early-Learning-Centre-Policy-V2.0.pdf
Complaints Management in Anglican Education & Care Services Procedures V2.0	https://www.stpauls.qld.edu.au/wp-content/uploads/2019/01/Complaints-Management-in-Anglican-Early-Learning-Centre-Procedures-V2.0.pdf
Staff Discipline and Misconduct Policy (Login required)	https://stpaulsqld.cspace.net.au/Assets/1658/1/POL-085StaffDisciplineandMisconductPolicy.pdf
Performance Management vs Realms of Thinking Certification Policy (Login required)	https://stpaulsqld.cspace.net.au/Assets/1659/1/POL-086PerformanceManagementvsRealmsofThinkingCertificationPolicyV11.pdf

Section 10

Risk Management Planning

Implementation

St Paul's School and Early Learning Centre has comprehensive processes to assess risks to the wellbeing of children and young people, and their protection from harm.

Our risk management plans are produced using the St Paul's School and Early Learning Centre Risk Assessment template and draw on the Anglican Schools Commission Risk Management Framework 2020. These documents can be found in the following locations:

Reference Document	Location (Login required)
Application for Excursion / Incursion	https://stpaulsqld.cspace.net.au/Assets/1478/2/FRM-036ApplicationforExcursionIncursionFormV5.pdf
Risk Assessment template	https://stpaulsqld.cspace.net.au/Assets/1490/4/RiskAssessment-ExcursionIncursion.docx
ASC Risk Management Framework 2020	https://stpaulsqld.cspace.net.au/Assets/1671/1/ASCRiskManagementFramework-2020.pdf

High-Risk Activities and Special Events

Our Risk Assessment processes enable the identification of high-risk activities and special events:

Activity	Management Plan (login required)
Rugby	STP-Risk-48 is managed in the St Paul's School and Early Learning Centre Risk Register.

Communication and Support

All staff at St Paul's School and Early Learning Centre use the Risk Assessment document and process. It is available on the School Intranet.

Section 11

Feedback

This is a document for our whole community. We welcome and encourage you to comment on it. As well as helping us improve and refine what we already do, your feedback will allow to explore new and emerging ways of keeping our students safe.

If you have a School login, you can submit your feedback using the form below:

<https://forms.office.com/r/2YLpeDgCQM>

If you don't have a School login, you can submit your feedback to compliance@stpauls.qld.edu.au.

Annexes & Appendices

Annexes

Annex	Title
A	Child and Youth Risk Management Terms of Reference
B	Student Protection Poster template
C	Appointment of Student Protection Officers
D	Compliance Training Requirements and Training Calendar
E	Blue Card Policy and Procedure
F	Change Log

Appendices

Appendix	Title
1	Code of Conduct
2	Protecting Children and Young People in Anglican Education - Policy
3	Protecting Children and Young People in Anglican Education - Procedure
4	Working with Children in Anglican Education (incl. Advice on Screening Requirements)
5	Recruitment and Selection in Anglican Schools
6	Forms
7	Resource Sheets

Child and Youth Risk Management Committee Terms of Reference

Purpose

This document establishes the terms of reference for the Child and Youth Risk Management Committee at St Paul's School and Early Learning Centre.

Child and youth risk management is focused on achieving the implementation of practices and procedures that support the wellbeing of children affected by the service we provide and protect children from harm.

Role

Child and Youth Risk Management Committees assist in:

- the implementation of the Working with Children in Anglican Education Policy at St Paul's School and Early Learning Centre;
- the application of Working with Children in Anglican Education Guidelines and Procedures; and
- the development, implementation and review of Child and Youth Risk Management Strategies, to achieve desired outcomes.

Governance model/ reporting process



Principles

In addition to the Statement of Commitment, detailed in the Child and Youth Risk Management Strategy; and associated legal responsibilities; the CYRMC will operate in accordance with, and actively promote, the following principles:

- Understanding that a proactive approach to safety and wellbeing is important in assisting children reach their potential as they develop their character and progress towards adulthood.
- Applying a holistic and considered understanding to the safety and wellbeing of children, using contemporary, evidence-based knowledge and resources to inform our continuous improvement.
- Applying good sense and sound judgement in practical matters.
- Working respectfully and in partnership to achieve the best available outcomes for children, strengthening networks to increase safety and support across our communities.
- Operating by Gospel Values, emphasising service, inclusivity, integrity, courage, justice, and generosity of spirit.

Roles

Chairperson: Responsible for leading the committee, including ensuring appropriate reporting.

Secretariat: Provides administration support required for the committee to operate effectively, including ensuring recording that requirements are met.

Member: Relevant to their role described in the table below. Note, members may:

- participate in some or all meetings (where meetings are the most appropriate mechanism)
- achieve their work through another mechanism, such as emails or Microsoft Teams site
- be allocated stakeholders that they are responsible for working/consulting with as relevant to the business of the committee
- consult/ provide advice to the committee through another member (e.g. parent or student representatives providing information through a Head of Primary)

Critical friend (Optional): A trusted person, independent of the School or Service, who, as part of the Terms of Reference, agrees to confidentiality and is focused on providing constructive, independent feedback to inform the work of the committee. For example, a graduate of the School, a local academic or a representative from a local community service provider.

Reporting

The Chair is responsible for ensuring the Committee, at minimum on a *quarterly* basis, provide a briefing through written reports to:

- Headmaster and School Council;

The Chair is also responsible for supporting the Head or Nominated Supervisor provide an *annual* report to their governing body.

- This is required for all owned and subsidiary Anglican Schools and all Services where the Diocese is the Approved Provider (to be provided to the ASC for reporting to Diocesan Council).

- For other Schools and Services, it is recommended to be provided to respective governing bodies.

Meetings and administration of the committee

- Meeting frequency will be once per quarter (immediately prior to a regular meeting of the Student Wellbeing Committee)
- Committee records including records of meetings, such as attendees and decisions made, will be kept as per approved records retention processes.

Membership

Membership of this committee has been chosen to represent the variety of contexts that the Child and Youth Risk Management Strategy relates to, and to facilitate collaboration with a range of stakeholders from within these contexts, including children, young people, parents, staff and volunteers.

Name	Position	Committee Role
N. Grant	Executive Director of Faith and Community	Chair
M. Barratt	Risk & Compliance Officer	Secretary
L. Bolger	House Leader	
M. Connolly	Director of Junior School and Student Protection Officer	
D. Fenwick	House Leader	
K. Green	Head of Extra-Curricular Music	
C. Howes	Head of Experiential Learning	
S. Hughes	House Leader	
T. Hughes	Student Protection Officer	
E. Trudgian	House Leader	
M. Leam	Chaplain	
C. Litherland	Head of Sport Development	
A. Pashen	Counsellor and Student Protection Officer	
K. Power	Director of International Education	
K. Semple	Counsellor and Student Protection Officer	
S. Sutherland	Homestay Coordinator and Student Protection Officer	
C. Wegener	Educational Leader St Paul's Early Learning Centre	
N. White	House Leader	

Student Protection Poster Template

All posters are available for download here:

Poster - Junior School

Poster - Secondary School 1

Poster Secondary School 2



Talk to a trusted adult or your Student Protection Officers:



Marianne Connolly
Director Of Junior School
Nominated Supervisor ELC

Junior School
m.connolly@stpauls.qld.edu.au
3261 1388



Kellee Green
Head of Extra-Curricular Music

Music Centre
k.green@stpauls.qld.edu.au
3261 1388



Tim Hughes
Teacher

Farmhouse
t.hughes@stpauls.qld.edu.au
3261 1388



Amanda Pashen
School Counsellor

Wellbeing Centre
a.pashen@stpauls.qld.edu.au
3261 1388



Karen Semple
School Counsellor

Wellbeing Centre
k.semples@stpauls.qld.edu.au
3261 1388



Sharon Sutherland
Homestay Coordinator

Sutton Building
s.sutherland@stpauls.qld.edu.au
3261 1388

Hiding behind a smile...



Talking will help. I will listen.

Talk to a trusted adult or your Student Protection Officers:



Marianne Connolly
Director Of Junior School
Nominated Supervisor ELC

Junior School
m.connolly@stpauls.qld.edu.au
3261 1388



Kellee Green
Head of Extra-Curricular Music

Music Centre
k.green@stpauls.qld.edu.au
3261 1388



Tim Hughes
Teacher

Farmhouse
t.hughes@stpauls.qld.edu.au
3261 1388



Amanda Pashen
School Counsellor

Wellbeing Centre
a.pashen@stpauls.qld.edu.au
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Your safety is more than words

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Appointment of Student Protection Officers



Appointment of Student Protection Officers

FRM-080

Version	4.0
Effective From	21 February 2023
Next Review	15 January 2024

create your own story!

St Paul's School has adopted the *Protecting Children and Young People in Anglican Education Policy and Procedures*, published by the Anglican Schools Commission. This policy and procedures outlines how St Paul's School will ensure the safety and wellbeing of students attending the school by responding to all allegations of child abuse and neglect or inappropriate behaviour by a staff member or volunteer towards a student and referring students and families for support when appropriate.

When staff, students, parents, volunteers or members of the school community have concerns for a student at the school, they should discuss their concerns with the Headmaster or one of the Student Protection Officers listed below.

As appointed by Dr Paul Browning:

Name	Position	Phone number
Marianne Connolly (Junior School) m.connolly@stpauls.qld.edu.au	Director of Junior School	07 3261 1388
Tim Hughes (Wellbeing Centre) t.hughes@stpauls.qld.edu.au	Teacher	07 3261 1388
Amanda Pashen (Wellbeing Centre) a.pashen@stpauls.qld.edu.au	School Counsellor	07 3261 1388
Karen Semple (Wellbeing Centre) k.semble@stpauls.qld.edu.au	School Counsellor	07 3261 1388
Sharon Sutherland (Sutton Building) s.sutherland@stpauls.qld.edu.au	Homestay Coordinator	07 3261 1388
Kellee Green (Music Centre) k.green@stpauls.qld.edu.au	Head of Extra-Curricular Music	07 3261 1388

While staff and volunteers are required to follow the *Protecting Children and Young People in Anglican Education Policy and Procedures*, this does not limit the freedom of any person to discuss concerns for the safety of any child or young person directly with the Queensland Police Service or the Department of Communities, Child Safety and Disability Services.

Please note: this form must be kept up to date and retained in this folder to meet legislative requirements.

Dr Paul Browning
Headmaster's Name



Signature

21.2.23
Date

Compliance Training

1. Compliance Training Requirements

St Paul's School and early Learning Centre uses a variety of training materials and methods to educate and inform our community about Child Protection and WHS. The table below details what training is required for each role. If you have a question about a role that isn't in the table, contact the Risk and Compliance Officer at compliance@stpauls.qld.edu.au

		Child Protection								WHS		
	Course or Training	CompliLearn Child Protection Course	Code of Conduct Acknowledgement of Understanding	Annual Child Protection Refresher	Student Duty of Care	SPO Induction Course	SPO Scenario Training	School Induction Document	ELC Induction	Bullying, harassment and discrimination	Work Health & Safety	Evacuation Training
	Frequency	Once On appt	Once On appt	Annually T1	Once On appt	Once On appt	As required	On appt (annually for volunteers)	On appt Or As required	On appt	On appt	On appt
Paid Worker	Teaching & Associate - Contract & Permanent	☑	☑	☑	☑	☑		☑	☑	☑	☑	☑
	Associate Staff Contract & Permanent	☑	☑	☑	☑	☑		☑	☑	☑	☑	☑
	Teaching & Associate Staff – Supply	☑	☑	☑				☑	☑	☑	☑	☑
	Associate Staff - Supply	☑	☑	☑				☑	☑	☑	☑	☑
Volunteer	Parent of current student		☑					☑				
	Sports Coach		☑					☑				
	Council Member		☑					☑				
	Association Member		☑					☑				
Independent Businesses	Healthcare professionals		☑					☑	☑			
	Music Tutors	☑	☑	☑				☑		☑	☑	☑
Additional Training for Specialised Role	Student Protection Officer					☑	☑					

2. Compliance Training Calendar

The calendar below details when there are timetabled compliance training or Professional Development activities throughout the School year. Detailed information about each of these activities will be promulgated by the School Lead in a timely manner.

		Jan			Feb			Mar			Apr			May			Jun			Jul			Aug			Sep			Oct			Nov			Dec		
Week																																					
WHS	First Aid										4a												4b														
	Fire Training	1																																			
	New Staff Induction Courses	2																																			
Child Protection	Annual Child Protection Refresher	3																																			
Other	Staff Flu Vaccinations										5																										

Timetabled Course and Activity Descriptions (refer to calendar)

<div>1</div> <div>Title. Evacuation Training Overview. Fire safety evacuation course Delivery. Online via CompliLearn Duration. 1 hour School Lead. R&C Officer</div>	<div>2</div> <div>Title. New Staff Induction Courses Overview. In person induction + allocated time to complete online courses. Delivery. Teaching Staff PD day No.1 in Jan Duration. 3 hours School Lead. R&C Officer.</div>	<div>3</div> <div>Title. Annual Child Protection Refresher Overview. ASC provided refresher course Delivery. Online via CompliLearn School Lead. R&C Officer</div>	<div>4a & 4b</div> <div>Title. 6a Staff First Aid main course 6b Staff First Aid mop-up Overview. First Aid training for staff. Full First Aid every 3 years. Annual CPR refresher all remaining years. Delivery. Delivered on-site. Student Free day at start of Term 2 Mop-Up Student Free/QCE Assessment Day Term 3 Durations. Full First Aid. 3.5 hours CPR. 1.5 hours Early Childhood First Aid 4 hours</div>
<div>5</div> <div>Title. Staff Flu Vaccinations Overview. Annual, employer provided flu vaccinations. Delivery. On-site. Afternoon of Student Free Day in Term 2. Duration. 3 hours School Lead. R&C Officer</div>			

Routine, Year-Round Course and Activity Descriptions

<p>Title. School Induction Presentation</p> <p>Overview. Signed induction document covering School intro, child protection and WHS.</p> <p>Delivery. DocuSign</p> <p>School Lead. R&C Officer and Assistant to the Manager of Operations</p>	<p>Title. Student Duty of Care</p> <p>Overview. An online course covering duty of care, what it is, how we deliver it and where it extends to.</p> <p>Duration. Approx 40 mins.</p> <p>Delivery. Online via CompliLearn</p> <p>School Lead. R&C Officer</p>	<p>Title. Bullying, Harassment, and Discrimination.</p> <p>Overview. An online course to raise staff awareness, outline unacceptable behaviours and signpost support.</p> <p>Duration. Approx. 45 minutes</p> <p>Delivery. Online via CompliLearn here</p> <p>School Lead. R&C Officer</p>	<p>Title. SPO Induction Course</p> <p>Overview. An overview and introduction to the SPO role. Mandatory training for SPOs.</p> <p>Delivery. In person by ASC at ASC</p> <p>Duration. 1 day.</p> <p>School Lead. SPOs</p>
<p>Title. Annual Child Protection Refresher</p> <p>Overview. An online child protection course, produced by the ASC and hosted on CompliLearn.</p> <p>Duration. Approx. 1 hour.</p> <p>Delivery. Online via CompliLearn</p> <p>School Lead. R&C Officer</p>	<p>Title. ELC Induction</p> <p>Overview. ELC specific induction to meet legislative requirements. Completed in addition to School induction</p> <p>Delivery. In person with Director of Junior School</p> <p>Duration. 30 minutes</p> <p>School Lead. Director of Junior School</p>	<p>Title. Additional Child Protection Training</p> <p>Overview. In addition to the ASC annual child protection refresher, the ASC will issue additional child protection training during the course of a year.</p> <p>Delivery. Varies as directed by the ASC</p> <p>Duration. Varies</p> <p>School Lead. R&C Officer</p>	

Blue Card Policy

1. Purpose

This policy and procedure outlines how St Paul's School and Early Learning Centre complies with current child protection legislation by maintaining a record of people engaged by the School.

2. Scope

This policy applies to all people engaged by St. Paul's School and Early Learning Centre and covered in its Child and Youth Risk Management Strategy.

3. Definitions/Abbreviations

BCOP	Blue Card Organisational Portal
BCR	Blue Card Register
BCR Status - Processing	This status is added to any record that is being actively managed and has an unfinished, routine process or action. It is most commonly used to track Blue Card applications and renewals.
BCR Status – Review Required	This status is added to any record that is being actively managed and has a process or action that causes concern. It could be applied to suspected breaches that are being investigated; missing information that can't be located or identified; a discrepancy in information that is being investigated.
BCR Status – Is Active	This status is added to the record of any person currently engaged by St Paul's School or Early Learning Centre.
BCR Status – Is Active (Homestay)	This status is added to the record of any family members currently hosting Homestay students
Blue Card Register	The School database that records all relevant Blue Card and personal information for Staff and Workers engaged by the School.
Engaged	<ul style="list-style-type: none"> • an employee; or • a contractor or subcontractor; or • an employee of a contractor or subcontractor; or • an employee of a labour hire company who has been assigned to work in the person's business or undertaking; or • an apprentice or trainee; or • a student gaining work experience; or • a volunteer; or • a pre-service teacher
May	Is used to indicate an optional course of action.
Must	Indicates that a legal requirement exists and must be complied with.
School	St Paul's School and Early Learning Centre
Shall	Indicates a directive to be followed.
Should	Is used to indicate a recommended course of action.

4. Responsibility and Accountability

Headmaster	<ul style="list-style-type: none">• Is responsible for ensuring compliance with current child protection legislation. The tasks associated with this are delegated to the Risk and Compliance Officer
Homestay Coordinator	<ul style="list-style-type: none">• Is responsible for the day-to-day management of the Blue Card Database for Homestay
Risk and Compliance Officer	<ul style="list-style-type: none">• Is responsible for day-to-day management of the Blue Card Database for the School, Early Learning Centre and Association• Shall periodically review and update this policy.

5. Access

a. Blue Card Organisational Portal

- The following positions have access to the School's Blue Card Organisational Portal:
 - Headmaster
 - Risk and Compliance Officer
 - Homestay Coordinator
 - International School Registrar
 - Admin Assistant – Operations
 - Operations Manager

b. Blue Card Register

- The following positions have access to the School's Blue Card Register:
 - Headmaster
 - Risk and Compliance Officer
 - Homestay Coordinator
 - International School Registrar
 - IT Manager
 - Admin Assistant – Operations
 - Operations Manager

6. Business Continuity

a. Term-Time

- The Risk and Compliance Officer and Homestay Coordinator are the primary users of the Blue Card Organisational Portal and Blue Card Register. If one is absent, the other will provide cover for Blue Card Register and Blue Card Organisational Portal matters.
- If the Risk and Compliance Officer and Homestay Coordinator are absent at the same time, the Admin Assistant – Operations will provide cover for Blue Card Register and Blue Card Organisational Portal matters.

b. Outside of Term-Time

- Outside of Term-Time, the International Registrar can be contacted for assistance relating to the Blue Card Register and Blue Card Organisational Portal

7. Audit

a. Internal Audit

- To maintain the integrity and accuracy of the records kept by the School, the following checks are carried out:

Frequency	Check	Description	Responsible
Daily	BCOP	Action any Issued Card Notices	Risk and Compliance Officer – School, ELC and Association
	Inductions & interviews	Action any Blue Card information provided in returned induction packs; Application forms; or interviews	
	BCR	Update and reconcile any records with a “Review Required” status	
Weekly	BCR	Update and reconcile any records with a “Processing” status	Risk and Compliance Officer – School, ELC and Association Homestay Coordinator - Homestay
		Run “soon to expire – active” query and send renewal emails	
		Run “soon to expire – current” query and reconcile any records	
Termly	Term 1	100% review of records with status “Is Active”	Risk and Compliance Officer – Homestay Homestay Coordinator - School
	Term 2	100% audit for accuracy of Active and Inactive statuses	Risk and Compliance Officer – Homestay Homestay Coordinator - School
	Term 3	100% review of records with status “Is Active”	Risk and Compliance Officer – Homestay Homestay Coordinator - School
	Term 4	100% audit for accuracy of Active and Inactive statuses	Risk and Compliance Officer – Homestay Homestay Coordinator - School

b. Spot Checks

- Oversight of the individuals managing Blue Card matters is accomplished using spot checks. These checks are carried out on the School’s Blue Card Register by key staff members who are not involved in the day-to-day management of the Register.
- Sample:
 - School and Homestay Blue Card Registers.
 - Filtered by status “is active”.
- Metrics:
 - Evidence of Child Protection training completed in accordance with the School’s Training Matrix.

- Evidence of current Blue Card, Exemption Card, QCT registration, AHPRA registration or status as parent of a current student.
- Method:
 - Spot-checkers are provided with a printout of the Sample and asked to select records at random until the Spot Check Quantity has been reached.
 - The Risk and Compliance Officer will then examine the Homestay Blue Card Register to provide the Metrics for each selected record.
 - The Homestay Coordinator will then examine the School Blue Card Register to provide the Metrics for each selected record.
- Spot Check at a Glance

Spot Checker	Spot Check Quantity	Frequency
Headmaster	20 records (10 from the School Register, 10 from the Homestay Register)	Once per Semester
Chair of the Child & Youth Risk Management Committee	20 records (10 from the School Register, 10 from the Homestay Register)	Once per Semester

Change Log

No.	Date of Change	Location	Change
1	Sep 22	All	Date changes from 2022 to 2023
2	Sep 22	Section 2	CYRM Committee membership updated to include Head of Extra-Curricular Music and new Head of Sport Development
3	Sep 22	Annex D	POL-098 Compliance Training Policy Updated to reflect distribution of courses across 2023
4	Oct 22	Annex E	POL-096 Blue Card Policy and Procedure updated to reflect: <ul style="list-style-type: none"> • Operations Manager has access to Blue Card Register and Blue Card Org Portal • Homestay definition of “Is Active” status created to mean a family that is currently hosting a Homestay student • Change of spot checks from termly to once per semester

Appendix 1

Code of Conduct

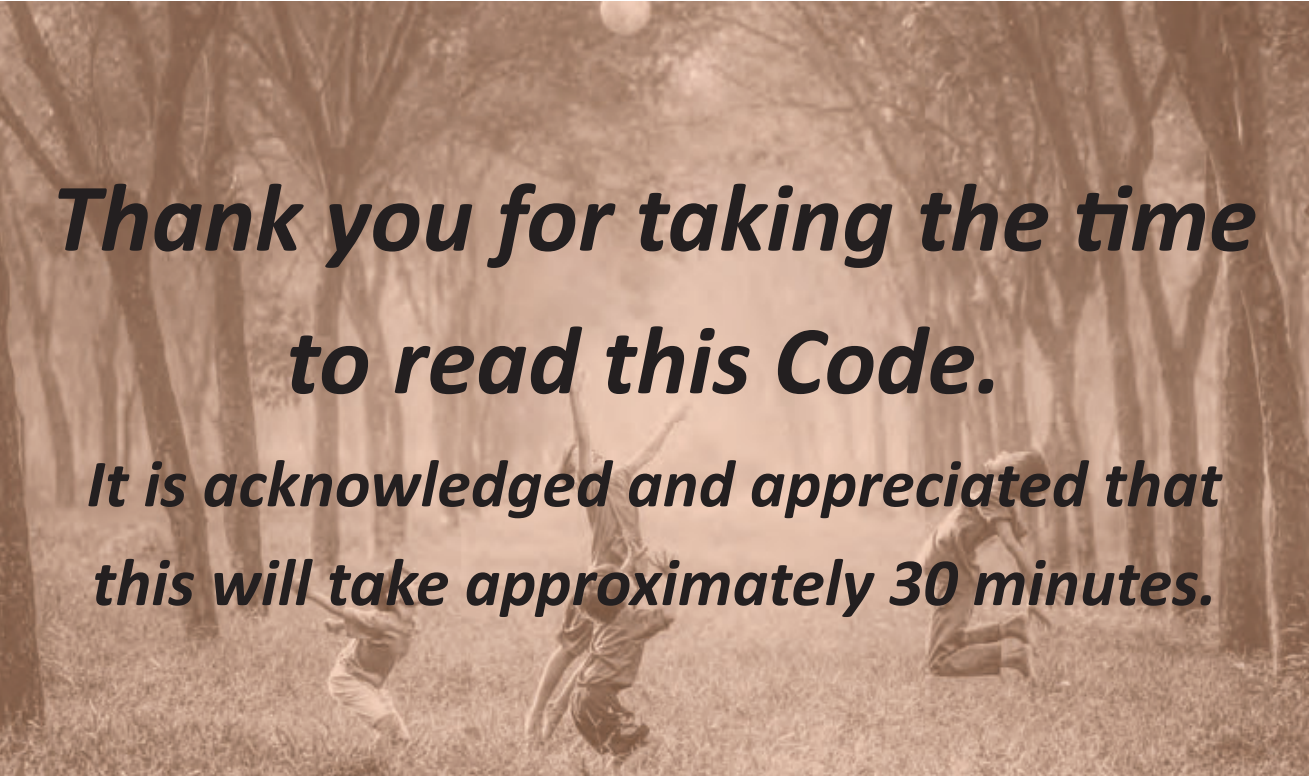
OUR COMMITMENT:

Creating environments for children
and young people to thrive



CODE OF CONDUCT

for Anglican Schools and
Education & Care Services



***Thank you for taking the time
to read this Code.***

***It is acknowledged and appreciated that
this will take approximately 30 minutes.***

1. CONTEXT OF THIS CODE

1.1 SAFE MINISTRY TO CHILDREN CANON 2017

The Anglican Church Southern Queensland (ACSQ) adopted the *Safe Ministry to Children Canon 2017* (SMCC). The SMCC sets national benchmarks for safe ministry to children.

One of the key areas covered by the SMCC is the Code of Conduct. Section 5 of *Faithfulness in Service* is prescribed as the Code of Conduct for all ministry to children across the Anglican Church of Australia, unless the Standing Committee of the General Synod Anglican Church of Australia, determines a **Church body** has a Code of Conduct containing equivalent standards of conduct for observance and guidelines for conduct to be followed. An appropriately adapted Code of Conduct gives substantial effect to the standards of conduct and guidelines for conduct contained in Section 5 of *Faithfulness in Service*.

Our Commitment: Creating environments for children and young people to thrive — Code of Conduct for Anglican Schools and Education & Care Services (this Code) has been adapted for Anglican **Schools** and **Education & Care Services**, and has been developed to comply with the requirements of the SMCC.

1.2 FAITHFULNESS IN SERVICE

The General Synod of the Anglican Church of Australia adopted *Faithfulness in Service* as the national code for personal behaviour and the practice of pastoral ministry by clergy and church workers. *Faithfulness in Service* is intended to identify the personal behaviour and practices of pastoral ministry that enable clergy and church workers to serve faithfully those among whom they minister; supporting communities to be safe places for everyone, where integrity is honoured, accountability is practised, and forgiveness encourages healing and does not conceal misconduct.

As such, *Faithfulness in Service* has been used as a foundation to build this Code.



1.3 WORKING WITH CHILDREN (RISK ASSESSMENT AND SCREENING) ACT 2000 AND REGULATION 2011

Queensland's *Working with Children (Risk Management and Screening) Act 2000* and *Regulation 2011* require Schools and Education & Care Services to develop and implement a written strategy for employment practices and procedures that:

- promotes the wellbeing of children affected by each type of regulated employment or business undertaken as part of the School/ECS; and
- protects children from harm.

Each strategy is required to be reviewed annually and include specific matters, such as the requirement to have a code of conduct for interacting with children.

This Code has been developed to assist Anglican Schools and Education & Care Services in meeting that requirement.

1.4 ROYAL COMMISSION INTO INSTITUTIONAL RESPONSES TO CHILD SEXUAL ABUSE

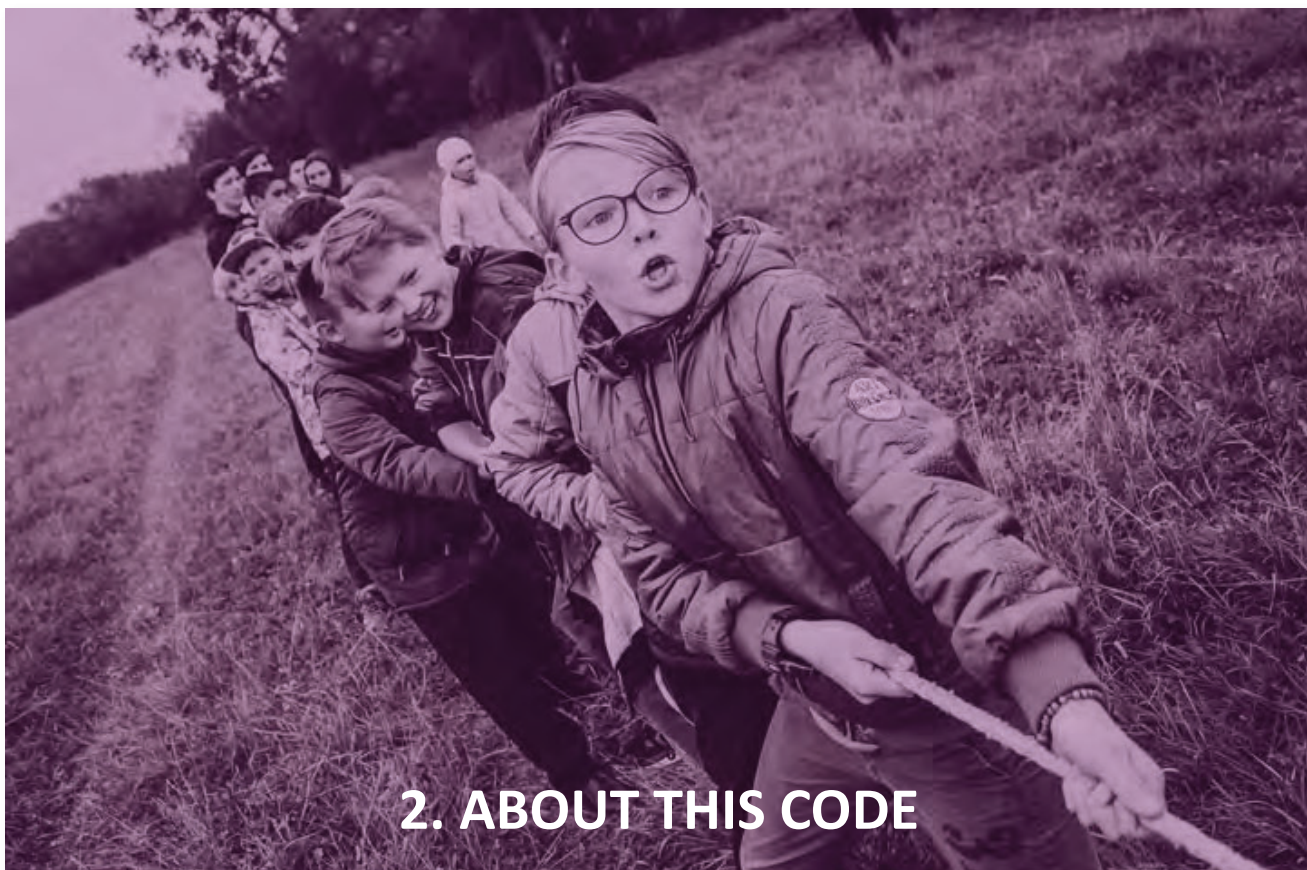
Commencing in 2013, the Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission) was constituted as an inquiry for the Commonwealth, and each of the states and territories. The Royal Commission made findings and recommendations to better protect children against sexual abuse and alleviate the impact of abuse when it occurs.

Releasing their Final Report in December 2017, the Royal Commission made a number of recommendations relevant to Anglican Schools and Education & Care Services, including that “staff and volunteers comply with a code of conduct that sets clear behavioural standards towards children” (part of recommendation 6.6). Furthermore, recommendation 7.8 of the Royal Commission states “institutions should have a clear code of conduct that:

- outlines behaviours towards children that the institution considers unacceptable, including concerning conduct, misconduct or criminal conduct;
- includes a specific requirement to report any concerns, breaches or suspected breaches of the code to a person responsible for handling complaints in the institution or to an external authority when required by law and/or the institution’s complaint handling policy; and
- outlines the protections available to individuals who make complaints or reports in good faith to any institution engaging in child-related work”.

In addition to this, the Royal Commission specifically recommends the code of conduct includes use of the online environment (recommendation 6.6, standard 8).

This Code has been developed to comply with these recommendations.



2. ABOUT THIS CODE

2.1 WHO DOES THIS CODE APPLY TO?

This Code applies to all **staff** and **volunteers** within the Diocese of Brisbane's Anglican Schools and Education & Care Services (ECS). This includes any business or institution associated with the School/ECS, for example: international colleges, boarding houses, home stay services or sporting clubs.

Other Anglican Schools and ECS in Queensland have approval from the Anglican Schools Commission, ACSQ to use this Code of Conduct.

2.2 WHEN DOES THIS CODE APPLY?

This Code applies to staff and volunteers undertaking their role within a relevant School/ECS. This includes, but is not limited to:

- behaviour that includes, relates to, or impacts upon a person who the staff member or volunteer has contact with as part of their role within the School/ECS; and
- behaviour that occurs in a physical or online environment.

*Reference to **children** and **young people** within this Code applies when the staff member or volunteer's relationship with a child or young person is as a result of their role at the School/ECS.*

2.3 RELATIONSHIP WITH OTHER CODES OF CONDUCT, SIMILAR REQUIREMENTS OR LAW

It is recognised that staff and volunteers may be subject to more than one Code of Conduct or similar requirement. For example:

- *Faithfulness in Service in Schools (Codes for School Principals and Members of Governing Bodies of Schools)*
- *Faithfulness in Service* and its application to Clergy
- *Code of Ethics for Teachers in Queensland*
- *Australian Professional Standards for Teachers*
- *Australian Professional Standard for Principals*
- *Early Childhood Australia (ECA) Code of Ethics*
- *Queensland Guidance and Counselling Association Code of Ethics*
- *Rugby Australia's Code of Conduct* and its application to players, coaches, administrators, volunteers, parents and spectators

If an apparent contradiction occurs between this Code and any other code or requirements (e.g. legislation, policy, procedures etc.), advice can be sought from the Anglican Schools Commission, ACSQ. If there is a contradiction with law, the legislation will prevail.

As a general rule, the requirement that provides the greater protection to children and young people's safety and wellbeing applies.

Where Schools and ECS have a pre-existing Code of Conduct that applies to staff and/or volunteers it is replaced with this Code.

Role specific requirements not detailed in this Code, are to be captured by the School/ECS in supporting documentation.

2.4 FORMAT AND PRESENTATION

The relevant sections of this Code consist of three parts:

*The **Preamble** introduces the section.*

*The **Standards** state the expectations for personal behaviour and the provision of service.*

*The **Guidelines** explain and illustrate best practice, highlighting practical ways to achieve this.*

Throughout the Code, all Key Terms appear in **bold text** the first time they appear, with Key Terms defined in Section 6.

3. IMPLEMENTING THIS CODE

PREAMBLE

3.1 This Code will only be effective if it is widely known and available throughout each School and Education & Care Services (ECS), implemented, and practised.

3.2 The absence of any reference to particular conduct in this Code does not imply that that conduct is acceptable for staff or volunteers.

3.3 All staff and volunteers have a responsibility to act when behaviour within the School/ECS is inconsistent with this Code.

3.4 Where a staff member or volunteer does not meet the **standards** of this Code, this will indicate an area requiring redress. This may result in formal disciplinary action as a breach of employment conditions.

3.5 Staff and volunteers are encouraged to follow the **guidelines** of this Code. Where this is impractical, an exercise of judgement will be required to ensure the safety and wellbeing of those with whom they work and themselves. Disregard of the guidelines may indicate an area where staff and volunteers require guidance and specialised help, or may indicate a breach of the standards and be managed as such.

STANDARDS

3.6 It is the responsibility of each staff member and volunteer to be aware of and meet the standards of this Code.

3.7 If you have **appropriate authority** in a School/ECS, ensure all staff and volunteers for whom you are responsible are made aware of this Code.

3.8 Do not penalise, discriminate or take action against other staff or volunteers because of any action taken in good faith under this Code.

GUIDELINES

3.9 If you are aware of behaviour of a staff member, volunteer or visitor to the School/ECS, or of a child or young person that leads to you or others feeling uncomfortable or concerned, speak with an appropriate authority.

If you have reason to believe a member of staff or a volunteer has not met a standard or guideline of this Code, always inform an appropriate authority if you consider:

- a) a person (other than a child) may have suffered harm or has been placed at risk of harm; or
- b) the staff member or volunteer is persisting in disregarding the standard or guideline.

Where neither a) nor b) apply, you can approach the staff member or volunteer and identify the concern.

Note: This section does not apply to matters where a child or young person may have suffered or is at risk of harm. Matters of children and young people's safety are addressed in 4.15 of this Code.



4. CONDUCT WITH CHILDREN AND YOUNG PEOPLE

PREAMBLE

4.1 Children and young people are entitled to be safe and protected. They have the right to be respected, listened to and their particular needs addressed in all School or Education and Care Service (ECS) activities.

4.2 Service provision where children and young people are involved, requires absolute trustworthiness.

4.3 Staff and volunteers with appropriate authority in a School/ECS have a responsibility that cannot be delegated, for the implementation and maintenance of proper systems for the safety and welfare of children and young people.

4.4 When they are exercising a **service** in a School/ECS, staff and volunteers have responsibility for the safety and welfare of children and young people in their care.

4.5 Any form of **child abuse** is always wrong (refer to information in Key Term '**Abuse**'). Staff and volunteers have authority over children and young people because of their position, and power because of their greater age, maturity, physical size and life experience. Abuse arises from the misuse of authority or power.

4.6 Due to the inherent imbalance of power, children and young people are incapable of giving valid consent to abuse.

4.7 Appropriate physical contact is important for children's healthy development.

A photograph of a man lifting a young child into the air. The man is seen from the back, wearing a dark t-shirt, with his arms extended upwards. The child, with curly hair and wearing a dark shirt and pants, is in mid-air with a joyful expression. The background consists of a light-colored brick wall and a tree trunk on the right. The entire image has a blue tint.

“Children and young people are entitled to be safe and protected”



STANDARDS

4.8 If you have **appropriate authority** in a School/ECS, ensure:

- proper systems for the safety and welfare of children and young people participating in the School/ECS are implemented and maintained;
- all applicable requirements of the **civil authorities**, the **church authority** and the School/ECS are complied with; and
- all staff and volunteers for whom you have responsibility and who work with children and young people:
 - comply with all civil and School/ECS screening and selection requirements;
 - receive regular training in child protection; and
 - are aware of the provisions of this Code.

4.9 Take reasonable steps to ensure the safety and wellbeing of the children and young people in your care.

4.10 Do not abuse children or young people.

4.11 Do not administer **corporal punishment** to children or young people in your care.

4.12 Do not make available to children or young people any **prohibited material**. This includes enabling access inadvertently; for example, allowing a student to use your computer where prohibited material may be located. The only exception is wine in the context of a Holy Communion service.

4.13 Before accepting your appointment as an employee or commencing as a volunteer, you are to disclose to a person with appropriate authority if you:

- are currently charged with or convicted of an offence against a child;
- have been acquitted of a charge of an offence against a child;
- have had a charge of an offence against a child not proceed;
- have had a prohibited status under applicable 'working with children' screening legislation lifted; or
- have been the subject of any disciplinary proceedings involving child abuse.

4.14 Before allowing a person who:

- is currently charged with or convicted of an offence against a child;
- has been acquitted of a charge of an offence against a child;
- has had a charge of an offence against a child not proceed;
- has had a prohibited status under applicable 'working with children' screening legislation lifted; or
- has been the subject of any disciplinary proceedings involving child abuse;

to participate in activities involving children or young people:

a) consult with:

- for Schools owned or controlled by the ACSQ or ECS for which the ACSQ is the Approved Provider: the Director of Professional Standards or the Executive Director, Anglican Schools Commission;
- for other Anglican Schools or ECS, the Chair of either the School's governing body or the ECS management committee, or their delegate;

b) ensure a risk assessment is undertaken; and

c) be satisfied no child or young person will be at an increased risk of harm.

4.15 Following your appointment or commencement, if you are aware of behaviour of a staff member, volunteer or visitor to the School/ECS, or of a child or young person, that leads to you or others feeling uncomfortable or concerned, speak with an appropriate authority.

If you know or reasonably suspect a child or young person has been harmed or is at risk of harm from abuse, or if you know or reasonably suspect a staff member or volunteer has demonstrated **inappropriate behaviour**, comply with your roles and responsibilities as detailed in, but not limited to:

- Policy and Procedures for Student Protection in Anglican Schools; or
- Policy and Procedures for Child Protection in Anglican Education and Care Services.

GUIDELINES

4.16 Avoid situations where you are vulnerable and where your conduct may be construed as a breach of the standards of conduct in this Code.

RECOGNISING THE CHARACTERISTICS AND EFFECTS OF CHILD ABUSE

4.17 Be aware of the signs, symptoms and characteristics of child abuse and its impact on children and young people (refer to information in Key Term 'Abuse').

4.18 If you have appropriate authority in a School/ECS, ensure:

- there is a strategy to prevent child abuse from occurring during School/ECS activities. This includes giving age/developmentally appropriate information to children and young people; and
- Parents or guardians are advised that abuse of any child or young person will not be tolerated.

RECOGNISING THE CHARACTERISTICS OF SEXUAL OFFENDERS

4.19 Be aware of the **characteristics of sexual offenders**. A sexual offender may be a friend, family member, neighbour, peer, or a person in authority.

ENSURING THE SAFETY OF CHILDREN AND YOUNG PEOPLE

4.20 Taking all reasonable steps to ensure the safety and welfare of children and young people for whom you have responsibility, or are in your care, requires you to prepare or agree to, where relevant, a **risk management plan**, and the School/ECS **risk management strategy**.

SCREENING AND SELECTION OF PERSONNEL

4.21 If you have responsibility for compliance with screening and selection requirements, exercise care with the selection of staff and volunteers involved in mixed age or children's activities. Ensure relevant staff members or volunteers assisting with these activities agree with this Code of Conduct and have been screened as per the requirements of civil or other relevant authorities.

YOUR ROLE AND YOUR CAPACITY TO PERFORM IT

4.22 Recognise your limits and do not provide any service beyond your competence or certification. Arrange for any such service to be provided by an experienced person or specialist agency. For example, this applies particularly to:

- outdoor or adventure activities such as canoeing, abseiling and hiking; or
- referring a child or young person who requires specialised help (e.g. counselling for depression, abuse or addiction) to an appropriately qualified person or agency.

4.23 Children and young people should be able to trust and confide in staff and volunteers, and you should expect to develop relationships of this nature. Avoid fostering inappropriate dependence on the part of a child or young person.

4.24 Consideration must be applied before providing service to a child or young person with whom you already have a close personal relationship, such as a friend or member of your family. Care is needed because confusion between these relationships can lead to a loss of objectivity, failure to act in the other's best interest and harm to both parties.

4.25 Avoid behaviour that could give the impression of favouritism and inappropriate special relationships, particularly with individual children or young people.

4.26 Do not invite, accept or otherwise engage with children or young people using personal social media.

4.27 Outside of your role at the School or ECS, do not provide care (e.g. babysitting) to children or young people you have a relationship with as a result of your role.

4.28 Encourage children and young people to develop leadership skills and undertake leadership roles that are appropriate for their age and development.

USE OF EXTERNAL SERVICE PROVIDERS

4.29 When you engage or use an external service provider for an activity (e.g. when you engage a specialist in outdoor education or a speaker for a camp):

- make reasonable enquiries as to whether they have been screened and selected in accordance with civil and any School/ECS requirements;
- ensure they are only used in a supplemental capacity; and
- wherever practicable, ensure they are not left alone with any child or young person.

SUPERVISION

4.30 The degree of supervision required will vary according to the nature and environment of the activity, the age and maturity of the children or young people, and the size of the group. Having multiple staff and volunteers to ensure supervision and accountability standards are maintained is vitally important.

Given this:

- clearly distinguish the different levels of responsibility between you and any other staff/volunteers and ensure these differences are understood;
- consider the extent of supervision required, taking into account:
 - the age, number, ability and gender mix of the children or young people; and
 - the venue, time, duration and nature of the activity;
- have a register, or know how to access a register, of all children and young people, including the name and contact details of parents, guardians and emergency contacts; and
- consider and periodically review the application of School/ECS child protection procedures.



ACTIVITIES

4.31 Identify and minimise all potential hazards before embarking on any activity with children and young people. This is commonly referred to as a risk assessment and would include:

- being aware of the fire safety and evacuation procedures;
- ensuring emergency exits on School/ECS premises are clearly marked and never obstructed or internally locked;
- not permitting smoking in any premises where the activity is held; and
- not knowingly permitting people with serious contagious diseases to attend the activity.

4.32 Assess games or activities that emphasise gender, physical, intellectual or ethnic differences for their appropriateness. Think about what message children and young people may learn from the way events are organised and conducted.

4.33 Review in their entirety aural and visual materials, such as videos, films, computer games, graphics, photographs and lyrics; to ensure any elements containing violence, sexual activity or lifestyle are appropriate for the intended audience. Exercise care if a film or computer game has been recommended by the Office of Film and Literature Classification as unsuitable for viewing or playing by children of a particular age (e.g. MA, M and PG classifications). When assessing whether materials are suitable, take into account the age of the youngest child present. If in doubt, seek the advice of a **supervisor**.

4.34 To minimise the possibility of children or young people being harmed, give careful consideration to any activities or games that require children or young people to act alone or in pairs, independent of leaders.

4.35 Ensure no activity involving children or young people includes:

- secret initiation rites and ceremonies;
- nudity or engagement in sexual conduct;
- the use or availability of prohibited materials, except wine in the context of a Holy Communion service.

4.36 When taking children away from School/ECS premises, obtain the written consent of a parent or guardian, and keep them informed of the place and timing of the event. Where permitted by law, consent may include notification obtained by digital means. If you can, include parents or guardians in a supervision team of mixed gender.

VENUE

4.37 Avoid working alone or in isolation with children or young people. Ensure:

- all activities have defined boundaries that are easily observed or patrolled;
- all aspects of activities are open to observation;
- children require permission to leave School/ECS premises (noting this permission can be for a time period, rather than each occurrence);
- where individual or small group work is needed, this work occurs in the presence of adults, a public place or a location with high visibility; and
- you do not invite or have children or young people to your home or visit children or young people in their home when no other adult is present.

4.38 If arranging to meet a child or young person privately:

- where practicable, have parental or guardian consent (noting this consent can be for a time period, rather than a specific meeting);
- ensure, where appropriate, that a parent, guardian or suitable adult is present;
- inform a supervisor of the time, location and duration of the meeting; and
- hold the meeting in an appropriate venue, mindful of 4.37.

Where a meeting is unplanned, make a record of the time, location, duration and circumstances of the meeting and upon request, provide this record to your supervisor.

4.39 When events require children or young people to sleep over, where possible have:

- parents or guardians involved in the events and supervision;
- sleeping accommodation segregated between males and females;
- sleeping accommodation supervised by more than one adult of each gender; and
- supervisors not sleeping in close personal proximity to a child or young person, unless they are a parent or guardian of that child or young person.

4.40 Check venues allow for the privacy of all parties to be respected, particularly when changing clothes, washing and toileting. If you need to wash or toilet a child, tell another adult what you are doing.

HEALTH AND SAFETY

4.41 Ensure risk management plans (or risk assessments) include relevant contact details (e.g. emergency services and specialised help) and a first aid kit appropriate to the activity is available. In the case of camps and similar activities, ensure at least one adult present has recognised first aid training.

4.42 Do not administer prescription medications to a child without the written consent of a parent or guardian.

4.43 Obtain, or be provided with, information from parents or guardians about particular physical and mental health or safety needs of children or young people in your care (e.g. allergies, depression).

TRANSPORT

4.44 To the extent practicable, avoid being alone with a child or young person in a motor vehicle or driving a child or young person home unaccompanied. If such a situation is unavoidable, inform another adult of the trip and the reason for it, and make a record of the time, location, duration and circumstances of this transport and provide this record to your supervisor.

4.45 When transporting children or young people, abide by all road rules and laws (e.g. speed, car restraints, positioning of children in the car).

4.46 When making transport arrangements, take reasonable steps to ensure:

- all drivers or operators are licensed, responsible, experienced and are not impaired by alcohol or any other mind-altering or addictive substance; and
- all motor vehicles and other forms of transport used are registered, insured, safe and fitted with appropriate child restraints or safety devices (e.g. seat belts, life jackets).



PHYSICAL CONTACT

4.47 In general, excluding circumstances such as immediate physical danger or medical emergency, physical contact should be initiated by the child or young person or occur with their permission. When you make physical contact with a child or young person, be very careful you respect their feelings and privacy.

4.48 Ensure any physical contact you have with children or young people is of a non-sexual nature and appropriate to the situation. Avoid any physical contact that is sexually stimulating, or may be construed as sexually stimulating. Children or young people may or may not be aware of creating such situations. It is your responsibility to be alert for such situations and cease any inappropriate physical contact immediately.

4.49 Be very careful when making physical contact with children or young people. Appropriate contact includes, but is not limited to:

- bending down to the child's eye level, speaking kindly and listening attentively;
- gaining permission before hugging a child or young person and respecting their right to refuse;
- taking a child's hand and leading them to an activity;
- comforting a child or young person by placing an arm around their shoulder and giving a gentle squeeze from the side;
- praising or welcoming a child or young person by holding their two hands in your hands;
- patting the child or young person on the head, hand, back or shoulder in affirmation;
- holding a preschool child who is crying, provided that they want to be held; and
- reasonable restraint of a child or young person who is having a seizure, to prevent harm to themselves.

Inappropriate contact includes, but is not limited to:

- kissing or coaxing a child or young person to kiss you;
- extended hugging or tickling;
- touching any area of the body normally covered by a swimming costume, specifically the buttocks, thighs, breasts or groin areas;
- placing hands underneath any bedding when patting a child to sleep (in an ECS); and
- carrying older children, sitting them on your lap or having them rub up next to you.

BEHAVIOURAL GUIDANCE

4.50 When a child or young person's behaviour requires correction, either for the safety and welfare of themselves or the group, staff and volunteers will:

- where the situation permits, precede any action with a warning;
- explain the action to the child or young person;
- give the child or young person an opportunity to explain;
- ensure the action is appropriate to the occasion and age of the child or young person;
- ensure the form of action is not corporal punishment, does not ridicule or humiliate, or is not otherwise abusive;
- ensure very young children are not isolated;
- only use physical restraint necessary and reasonable to protect children or young people from harm or to avoid an accident;
- if physical restraint is used, keep a record that identifies the method of restraint used, the staff member or volunteer, the child or young person involved and any witnesses, and sets out the circumstances of the incident;
- if appropriate, ensure the child's parents or guardians and a supervisor are informed of the circumstances of the incident and the action taken; and
- make a record of the circumstances of the incident and the action taken.

4.51 If you have appropriate authority in a School/ECS, ensure that behavioural guidance policy is developed, made known and implemented.



COMMUNICATION AND TECHNOLOGY

4.52 Comply with policy, procedures and guidelines provided by the School/ECS, regarding the use of technology and related resources, including:

- ensuring all access to the internet while attending the School, using a School device, or undertaking your role as a staff member or volunteer, is of an approved nature;
- not using School/ECS digital communication identities, e.g. social media or work email accounts, for personal use; and
- not using personal digital technology in your contact with children and young people.

4.53 When considering using technology for communication, apply the same principles as you would in any other form of communication with children or young people, ensuring:

- it is an appropriate way to communicate with a child or young person;
- it is an appropriate way to communicate about the matter;
- you are sensitive to the impact of your words, images and actions on the child or young person, and any other person who may access it;
- you do not use sexually suggestive, explicit or **offensive language** or images; and
- the circumstances of the communication, including the language and images used, do not suggest your relationship with the child or young person is inappropriate.

4.54 Consider the risks associated with using technology in communication with children and young people, including:

- ignoring personal security settings on social networking sites;
- disclosing contact details or images of the child or young person in the communication;
- being unable to determine if people are who they say they are;
- exposing the child or young person to unwanted or inappropriate information;
- the child or young person becoming a victim of cyberbullying; and
- sexual predators gaining access to the child or young person.

4.55 Assist children and young people to stay safe when using technology to communicate with others by:

- educating children and young people, and their parents or guardians, about the risks associated with the use of this technology;
- encouraging children and young people to exercise care in disclosing personal information about themselves and others, such as their contact details; and
- encouraging children and young people to talk about anything that worries them, including anything they see or experience online, with **appropriate supports**.

4.56 If you have appropriate authority in a School/ECS, ensure:

- there is a policy for staff and volunteers regarding the use of technology to communicate with children and young people; and
- there are procedures regarding the approval to use social media for communications and promotions, for use within curriculum and learning activities, or for other benefit to the School/ECS.

PHOTOGRAPHS AND IMAGES

4.57 Follow the School/ECS policy and procedures for the making and use of children and young people's images.

4.58 If you have appropriate authority in a School/ECS, ensure there is a policy requiring staff or volunteers to obtain the permission of relevant parents and guardians before making or using images (including photographs and videos) of children and young people who are engaged in activities within the School/ECS. The form of permission should clearly indicate the intended use of the images.





RECORD KEEPING

4.59 If you are providing a service involving children or young people in a School/ECS, keep a register of attendance of the children and young people for whom you are responsible.

4.60 If you have appropriate authority in a School/ECS:

- ensure a register of attendance of children and young people, staff and volunteers, and a register of emergency contact details for children and young people, staff and volunteers, is kept;
- include such registers in the School/ECS archives; and
- keep and store in a secure place all permission forms and records relating to discipline, private meetings and student protection.

4.61 If you have appropriate authority in a School/ECS, ensure any screening documents:

- are treated with confidentiality and never left where they can be accessed by unauthorised persons;
- where kept electronically, are password protected and stored for any required period of time, with access limited to authorised persons; and
- where kept in paper form, are stored separately from any other documents and locked in secure place for any required period of time, with access limited to authorised persons.

5. ALL CONDUCT

PREAMBLE

5.1 Staff and volunteers have authority conferred upon them by their appointment to the School or Education and Care Service (ECS). The authority associated with these roles means they have power which is always to be exercised in the service of others, especially children and young people, and to the benefit of the School/ECS.

5.2 Abuse is one person's misuse of power over another. Sometimes abuse will be a one off event and at other times it will be a pattern of behaviour. Abuse can take any of several overlapping forms: **bullying, emotional abuse, harassment, physical abuse, sexual abuse or spiritual abuse.**

5.3 To work effectively with others, trust is of primary importance. Trust is supported by maintaining physical, sexual, emotional and psychological boundaries. Staff and volunteers will enhance their ability to maintain these boundaries by attending to their wellbeing.

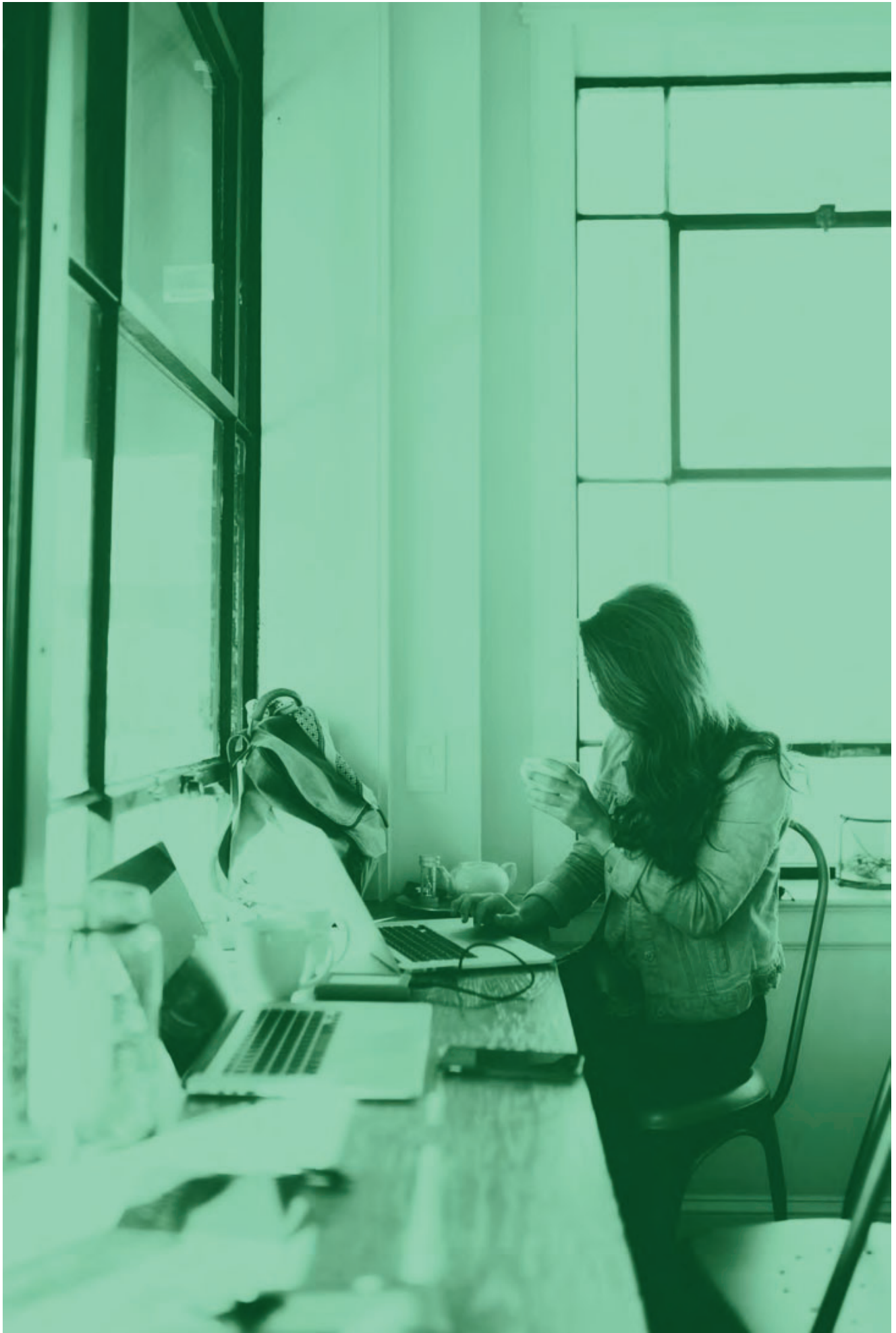
5.4 While staff and volunteers often enjoy personal relationships through the School/ECS, their responsibilities to service in the School/ECS take precedence.

5.5 Staff and volunteers are colleagues in service to the School/ECS: the activity of one inevitably impacts upon others.

5.6 The role of staff members and volunteers at the School/ECS may include financial management. This management can have a significant impact on the School/ECS.

5.7 Financial integrity is essential to all financial processes and transactions.

5.8 Staff and volunteers with **appropriate authority for financial management** in a School/ECS, are responsible for the implementation and maintenance of proper systems for financial integrity and accountability.



STANDARDS

5.9 If you have appropriate authority in a School/ECS, ensure staff and volunteers for whom you are responsible are provided with:

- a safe working environment, including safe housing, where housing is provided;
- opportunities to maintain and enhance their relevant skills; and
- personal encouragement, support and regular feedback.

5.10 Conduct yourself in an ethical and respectful manner. Treat people honestly, fairly, lawfully and without discrimination, and do not behave or communicate in a manner that brings the School/ECS into disrepute. Your behaviour or communication should reflect well on the School/ECS and not misuse power or position.

5.11 Seek at all times, to maintain or enhance confidence in the integrity of the service you perform. Avoid behaviour that gives the impression of favouritism or inappropriate relationships.

5.12 Do not engage in bullying, emotional abuse, harassment, physical abuse, sexual abuse or spiritual abuse.

5.13 Act in the best interests of the children and young people you are providing a service to. You must recognise any potential **conflict of interest** and take steps to resolve it, including consultation with a supervisor.

5.14 Do not **inappropriately discriminate** between people.

5.15 Do not disclose confidential information received in your School/ECS role to someone else, without the consent of the person providing the information, except where:

- the information is known publicly;
- as required or allowed by law; or
- it is in the public interest (such as to avoid the risk of serious injury or harm to any person).

5.16 When on leave or unable to fulfil your responsibilities through illness or any other reason, make alternative arrangements through advising the appropriate supervisor at the School/ECS.

5.17 Be responsible in your use of alcohol and other mind altering or addictive substances or services. This includes not undertaking School/ECS service when impaired by alcohol or any other mind-altering or addictive substances.

5.18 Do not use any **prohibited substance**.

5.19 Do not take property belonging to others, including intellectual property.

5.20 Do not knowingly make statements that are false, misleading or deceptive.

5.21 Do not knowingly use **offensive language**.

5.22 Do not view, possess, produce or distribute **restricted material**, without a legitimate purpose.

5.23 Observe the law. This includes, but is not limited to, the Acts and Regulations that relate to your duties.

5.24 Do not, as a result of your position or relationships formed as part of your role, seek personal advantage or financial gain for yourself or your family, beyond your stipend or wage, and recognised allowances and deductions.

5.25 Do not allow yourself to be influenced by offers of money or financial reward.

5.26 Avoid situations of conflict between personal financial interest and School/ ECS responsibilities.

5.27 Arrange personal and School/ECS finances to ensure clear account and transaction boundaries are maintained.

5.28 Fully disclose and be publicly accountable for all School/ECS monies you handle.

5.29 If you have appropriate authority for financial management in a School/ ECS, ensure:

- proper systems for financial integrity and accountability are implemented and maintained;
- all staff and volunteers, for whom you have responsibility and who have authority for financial management in a School/ECS, are informed of their roles and responsibilities; and
- all stipends, wages and allowances payable are adequate, and paid promptly and in full.

GUIDELINES

PERSONAL BEHAVIOUR

5.30 Be aware of the **impact of abuse** on people.

5.31 Be able to identify bullying.

5.32 If another person indicates by their words or actions that they feel bullied or harassed by you, review your conduct. If in doubt, cease the conduct and seek advice from a supervisor. When teaching or exercising discipline as part of your role, do so respectfully.

5.33 Be sensitive to the effect of your language on others. Avoid using language that may be misunderstood or that bullies, threatens, belittles, humiliates or causes unnecessary offence or embarrassment. Avoid gossip and take care when using:

- any swear word;
- language which has sexual connotations; and
- racial, religious or other group descriptions.

5.34 Avoid public criticism of staff or School/ECS communities, and the Anglican Church of Australia, its leadership and people.

5.35 Seek professional help if the use of alcohol, other mind altering or addictive substances or products (e.g. gambling) adversely affect your role.

5.36 If engaged in civil disobedience, do not act violently or intentionally provoke violence.

5.37 Dress appropriately, be sensitive to the effect that your attire may have on others.

5.38 Comply with copyright legislation. Ensure any licences for the use of copyright material are current and complied with, and copyright is duly acknowledged.

5.39 Exercise discretion when viewing or using restricted material:

- consider the legitimate purpose of viewing or using the restricted material;
- consider whether your conduct will damage your reputation; and
- disclose the purpose and circumstances of your conduct to a supervisor or colleague, to avoid any misunderstanding.

BOUNDARIES

5.40 Ensure you understand the requirements of your role, including hours to be worked and nature of your responsibilities, as well as leave and other entitlements.

5.41 Be aware of policies, delegations, protocols and procedures related to your duties.

5.42 Recognise the limits of your skills and experience. Do not undertake service (such as relationship counselling, or counselling for abuse or addictions) beyond your competence, or the role for which you have been employed or trained. If in doubt seek advice from a supervisor. A person who requires specialised help should be referred to an appropriately qualified person or agency.

5.43 Where responsibilities overlap, be aware of the activities, function and style of other staff and volunteers. Consult with these colleagues and co-operate wherever possible.

5.44 Where your responsibility to one person may conflict with your responsibility to another, or with your own interests, seek advice from a supervisor. Consider transferring responsibility for either or both of these to another.

5.45 Workplace relationships can legitimately develop into romantic or sexual relationships. If this begins to happen:

- acknowledge to yourself that your personal interest and the workplace relationship are at risk of becoming confused;
- declare the nature of the relationship to a supervisor to ensure accountability and prevent misunderstanding, working with the supervisor to develop an appropriate management plan.

A romantic or sexual relationship with a student is inappropriate, regardless of their age. This includes relationships with past students up to, at least, two years following their enrolment at the school.

5.46 If you are providing ongoing individual counselling as part of your role in the School/ECS, engage someone to provide regular professional supervision. This will help protect you and those to whom you counsel.

COMMUNICATION

5.47 Any communication in your role as a staff member or volunteer, whether formal or informal, is an encounter where you are representing the School/ECS. Communication may be face-to-face, in writing or involve some form of technology. Consider the appropriateness and impact of your words and actions.

5.48 Innuendoes or compliments of a sexual nature are always inappropriate. When a person asks questions or seeks advice around topics of a sexual nature, be aware that they may have motives or needs you do not understand. Be realistic about your ability to assist them.

5.49 To minimise the risk of being accused of or engaging in misconduct, particularly when meeting with people, think carefully in advance about:

- the place of the meeting, the arrangement of furniture and lighting, and your attire;
- whether the physical location allows for privacy of conversation while maintaining the opportunity for supervision. For example, doors to interview rooms, if closed, should not be locked;
- the physical distance between you and the other person, so as to maintain both hospitality and respect;
- whether the circumstances would suggest a social interaction;
- the propriety and circumstances of the interview when you are visiting, or being visited alone, especially at night;
- the personal safety and comfort of all participants;
- establishing at the outset, the interview's purpose and the boundaries with respect to the subject matter, confidentiality and its duration;
- the appropriateness of initiating or receiving any physical contact, such as gestures of comfort, that may be unwanted or misinterpreted.



5.50 When considering using technology for communication, apply the same principles you would in any other form of communication. Minimise the risk of harming others or yourself by asking:

- is this an appropriate way to communicate about this matter?
- should this communication be confidential?
- how does the language and images used impact upon the person receiving the communication and any other person who may access it?
- could the circumstances of the communication, including the language and images used, suggest your relationship with the other person(s) is inappropriate?

5.51 Be aware of the risks associated with using technology in communication. Remember information posted online can be retrieved. Dangers associated with the use of communication technology are not always appreciated. These dangers include:

- losing your privacy;
- losing control of information (such as photographs or emails);
- ignoring personal security settings on social networking sites;
- being unable to determine if people are who they say they are;
- being exposed to unwanted information; and
- becoming a victim of cyberbullying when someone sends or spreads threatening or embarrassing information.

CONFIDENTIALITY

5.52 Where possible, inform the person who may give you confidential information, of the limits to confidentiality and the arrangements for supervision or obtaining advice. Do so before the disclosure of the confidential information, such as at the beginning of an interview.

5.53 Be aware of and, when appropriate, seek advice in respect to:

- your legal obligations with regard to confidential information received, particularly in relation to criminal offences or child abuse;
- the consequences of breaching confidentiality; and
- the risk of physical, financial or emotional harm or hardship to another person by disclosing or not disclosing such information.

5.54 Exercise special care that any illustrative material you use from personal experience (e.g. photographs) does not involve a breach of confidentiality.

RECORD-KEEPING AND PRIVACY

5.55 If engaged in any individual counselling or supervision, consider keeping a factual record of your activity. Record details such as the date, time, place, participants, subject and any proposed action arising from each activity. Record personal remarks accurately.

5.56 Know the relevant principles of the applicable privacy legislation in relation to the collection, use, disclosure and management of personal information. These have implications for:

- the publication of personal information in school materials and websites;
- the recording and publication of voices and images of individuals; and
- the use and security of all personal information, especially sensitive information, held by staff or volunteers on School/ECS premises.

FINANCIAL MANAGEMENT PRACTICES

5.57 Ensure your salary packaging and the accounts of any School/ECS for which you have responsibility are in accordance with School/ECS, and civil taxation and accounting requirements.

5.58 If you have appropriate authority for financial management in a School/ECS, minimise the risk of you and other staff or volunteers being accused of, or engaging in, financial impropriety by ensuring:

- two persons, unrelated by family, handle money received;
- that School/ECS money on School/ECS premises is kept safely and securely;
- School/ECS money being taken home is avoided;
- all School/ECS money received is banked promptly;
- proper accounting records are kept for School/ECS transactions, in the form of receipts, diary entries, tax invoices, accounts and account statements;
- all School/ECS accounts have more than one signatory;
- any accounts paid by cash are duly receipted; and
- those with the responsibility for handling money have suitable training in financial matters.

GIFTS

5.59 If you are offered or receive a gift, whether monetary or otherwise, from a person with whom you have a relationship as a result of your role:

- establish for whom the gift is intended and exercise discretion as to whether the gift should be personally accepted;
- consider:
 - the size of the gift;
 - the intentions and circumstances of the giver;
 - the risk of your integrity being compromised; and
 - whether acceptance of the gift would be considered inappropriate, if known publicly;
- if it is substantial, disclose the offer or receipt to a supervisor or colleague; and
- if there is any uncertainty as to the gift's appropriateness, seek advice from a supervisor.

PERSONAL FINANCIAL OBLIGATIONS

5.60 Avoid borrowing money from, or lending money to, a person with whom you have a relationship as a result of your role, as this may place you in a position where your personal interest conflicts with your School/ECS responsibilities. If you do, then disclose the circumstances to a supervisor.





6. KEY TERMS

ABUSE, INCLUDING CHILD ABUSE

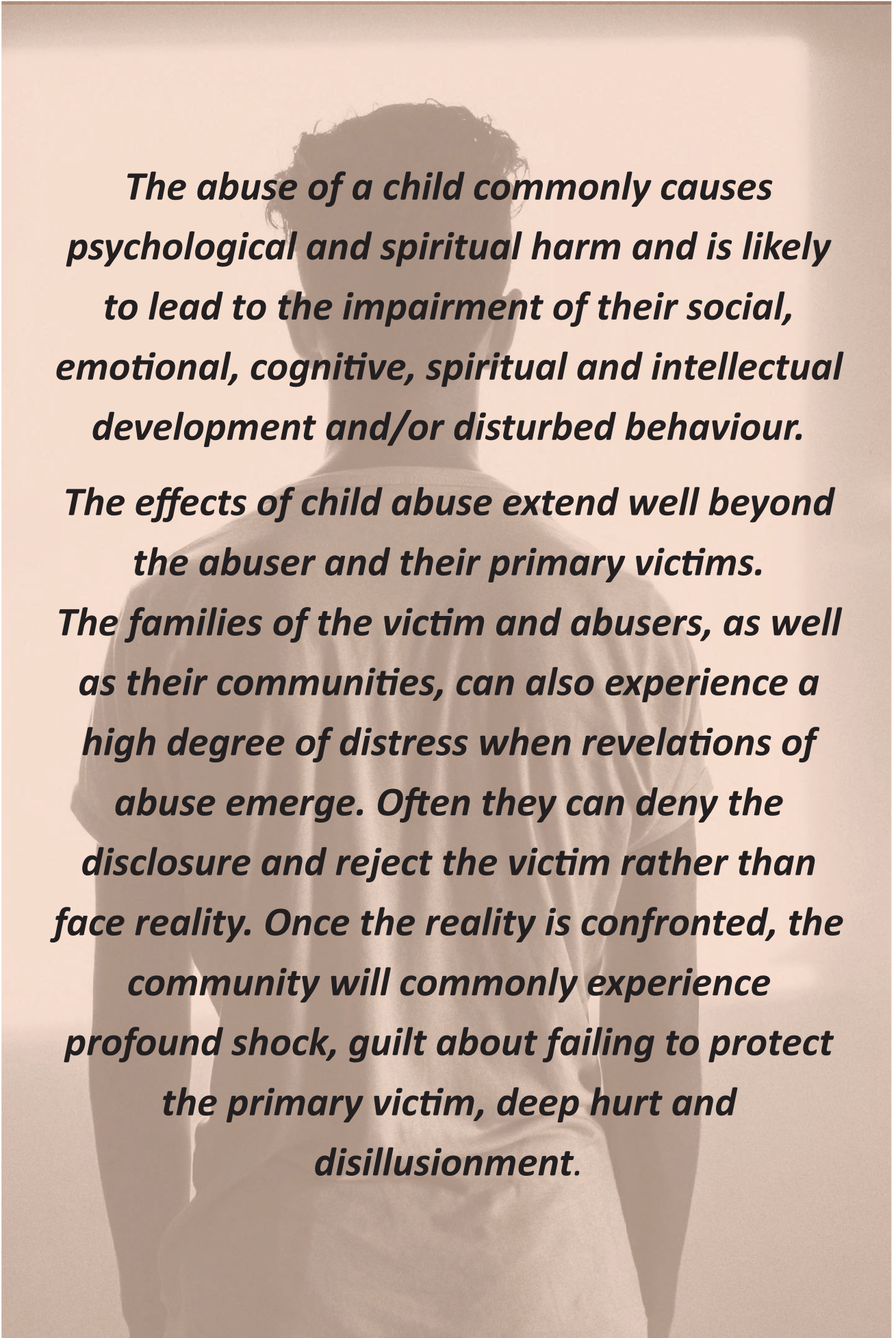
Abuse includes bullying, emotional abuse, harassment, neglect, physical abuse, sexual abuse or spiritual abuse.

CHARACTERISTICS AND EFFECTS OF CHILD ABUSE

Abuse of a child can be categorised as emotional, physical, sexual or spiritual. It can also arise from neglect, bullying or harassment.

The signs and symptoms can include, but are not limited to:

- emotional abuse - low self-esteem, apathy, an over readiness to relate to anyone, unduly aggressive behaviour, withdrawn behaviour;
- physical abuse - bruises, bites, burns and scalds, fractures;
- sexual abuse - a level of sexual knowledge or desire for either contact or distance inappropriate to the child's age, self-harm, social isolation, a sudden onset of soiling, wetting or other behavioural changes;
- spiritual abuse - low self-esteem, high levels of anxiety and fear, excessive deference to a leader, isolation from former friends and family members;
- neglect - failure of a child to grow within the normally accepted pattern, failure of a parent or guardian to provide adequate food, clothing, shelter, medical care and supervision;
- bullying or harassment - low self-esteem, loss of trust in others, apathy, an over readiness to relate to anyone, unduly aggressive behaviour, withdrawn behaviour.

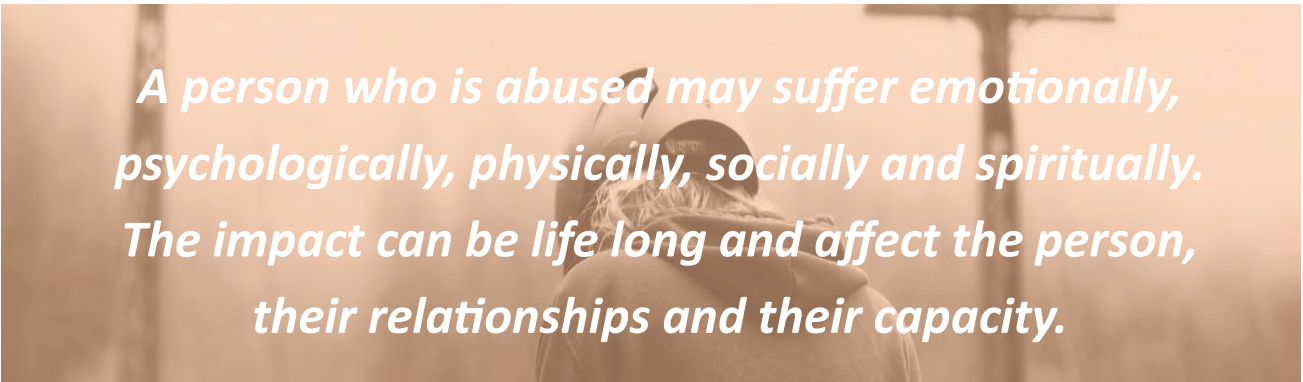


The abuse of a child commonly causes psychological and spiritual harm and is likely to lead to the impairment of their social, emotional, cognitive, spiritual and intellectual development and/or disturbed behaviour.

The effects of child abuse extend well beyond the abuser and their primary victims.

The families of the victim and abusers, as well as their communities, can also experience a high degree of distress when revelations of abuse emerge. Often they can deny the disclosure and reject the victim rather than face reality. Once the reality is confronted, the community will commonly experience profound shock, guilt about failing to protect the primary victim, deep hurt and disillusionment.

IMPACT OF ABUSE



A person who is abused may suffer emotionally, psychologically, physically, socially and spiritually. The impact can be life long and affect the person, their relationships and their capacity.

The person who is abused may experience, for example:

- feelings of shame, humiliation, rejection, powerlessness, insecurity, anger and resentment;
- sadness, tearfulness, depression, anxiety;
- fatigue, disturbed sleep, changed appetite and ill health;
- substance abuse, gambling and use of pornography;
- becoming more withdrawn or aggressive;
- burn out;
- suicidal thinking and action;
- loss of self-esteem and self-confidence;
- marital and family problems;
- breakdown in community and collegial relationships;
- loss of coping skills;
- disillusionment;
- inability to concentrate;
- loss of motivation;
- decreased productivity and competence;
- bad decision-making and poor judgement;
- loss of faith or crisis of vocation;
- difficulty trusting others;
- diminished employability;
- premature desire to cease employment.

BULLYING

Bullying means behaviour directed to a person or persons which:

- is repeated;
- is unreasonable (being behaviour a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening); and
- creates a risk to their health and safety.

Bullying can include:

- making derogatory, demeaning or belittling comments or jokes about someone's appearance, lifestyle, background or capability;
- communicating in an abusive manner;
- spreading rumours or innuendo about someone, or undermining in other ways, their performance or reputation;
- dismissing or minimising someone's legitimate concerns or needs;
- inappropriate ignoring or excluding someone from information or activities;
- touching someone threateningly or inappropriately;
- invading someone's personal space or interfering with their personal property;
- teasing someone, or playing pranks or practical jokes on someone; or
- displaying or distributing written or visual material that degrades or offends.

Behaviour does not include lawful conduct of staff and volunteers carried out in a reasonable manner, such as:

- disagreeing with or criticising someone's belief or opinions or actions in an honest and respectful way;
- giving information about inappropriate behaviour, in an objective manner, to the person or persons concerned and to any other person with a proper reason for having that information;
- setting reasonable performance goals, standards or deadlines;
- giving information about unsatisfactory performance in an honest and constructive way; or
- taking legitimate disciplinary action.

CYBERBULLYING is a form of bullying which involves the use of information and communication technologies.

EMOTIONAL ABUSE

Emotional abuse means acts or omissions that have caused, or could cause emotional harm or lead to serious behavioural or cognitive disorders. It includes:

- subjecting a person to excessive and repeated personal criticism;
- ridiculing a person, including the use of insulting or derogatory terms to refer to them;
- threatening or intimidating a person;
- ignoring a person openly and pointedly; or
- behaving in a hostile manner or in any way that could reasonably result in another person feeling isolated or rejected.

HARASSMENT

Harassment means unwelcome conduct, whether intended or not, in relation to another person, where they feel, with good reason in all the circumstances, offended, belittled or threatened. Such behaviour may consist of a single incident or several incidents over a period of time. It includes:

- making unwelcome physical contact with a person;
- making gestures or using language that could reasonably give offence including continual and unwarranted shouting;
- making unjustified or unnecessary comments about a person's capacities or attributes;
- putting on open display, pictures, posters, graffiti or written materials that could reasonably give offence;
- making unwelcome communication with a person in any form (for example, phone calls, email, text messages); or
- stalking a person.

NEGLECT

Neglect means the failure to provide the basic necessities of life where a child's health and development are placed at risk of harm. It includes being deprived of:

- food;
- clothing;
- shelter;
- hygiene;
- education;
- supervision and safety;
- attachment to and affection from adults; or
- medical care.

PHYSICAL ABUSE

Physical abuse means any intentional or reckless act, use of force or threat to use force, causing injury to, or involving unwelcome physical contact with another person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. An injury may take the form of bruises, cuts, burns or fractures. It does not include lawful discipline by a parent or guardian.



SEXUAL ABUSE OF AN ADULT

Sexual abuse of an adult means sexual assault, sexual exploitation or sexual harassment of an adult.

SEXUAL ASSAULT means any intentional or reckless act, use of force or threat to use force, involving some form of sexual activity against an adult without their consent. It includes:

- having or attempting to have vaginal or anal intercourse with a person without their consent;
- penetrating or attempting to penetrate another person's vagina or anus with an object or any bodily part without that person's consent;
- sexually touching and fondling or attempting to sexually touch or fondle a person without their consent;
- kissing or attempting to kiss another person without their consent;
- holding or attempting to hold another person in a sexual manner without their consent;
- forcing or attempting to force a person to sexually touch or fondle another person; or
- forcing or attempting to force a person to perform oral sex.



SEXUAL EXPLOITATION refers to any form of sexual contact or invitation to sexual contact with an adult, with whom there is positional power, e.g. pastoral or supervisory relationship, whether or not there is consent and regardless of who initiated the contact or invitation. This is not applicable where a declared relationship exists (refer to s 5.45).

SEXUAL HARASSMENT means:

- an unwelcome sexual advance, or an unwelcome request for sexual favours, to the other person, or
- other unwelcome conduct of a sexual nature in relation to the other person;

in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated that the other person would be offended, humiliated or intimidated.

Such behaviour may consist of a single incident or several incidents over a period of time. It includes:

- asking a person for sex;
- giving a person to understand that you would like sexual favours from them;
- making any gesture, action or comment of a sexual nature to a person directly or making a comment of a sexual nature about them in their presence;
- making jokes containing sexual references or innuendo using any form of communication;
- exposing a person to any form of sexually explicit or suggestive material;
- making unwelcome physical contact such as touching, pinching or patting;
- making unwelcome or unnecessary inquiries about, or attempts to discuss, personal matters of a sexual nature;
- deliberately intruding on an individual's personal space;
- staring at or secretly watching a person for the purpose of sexual stimulation or gratification; or
- stalking a person.

SEXUAL ABUSE OF A CHILD

Sexual abuse of a child means the use of a child by another person for his or her own sexual stimulation or gratification or for that of others. It includes, but is not limited to:

- making sexual advances to a child using any form of communication;
- exposing oneself indecently to a child;
- having or attempting to have vaginal or anal intercourse with a child;
- penetrating or attempting to penetrate a child's vagina or anus with an object or any bodily part;
- kissing, touching, holding or fondling or attempting to kiss, touch, hold or fondle a child in a sexual manner;
- staring at or secretly watching a child for the purpose of sexual stimulation or gratification;
- making any gesture or action of a sexual nature in a child's presence;
- making sexual references or innuendo in a child's presence using any form of communication;
- discussing or inquiring about personal matters of a sexual nature with a child;
- possessing, creating or exposing children to **child exploitation material** of a sexual nature;
- exposing a child to any form of sexually explicit or suggestive material including clothing with sexually explicit images or messages;
- giving goods, money, attention or affection in exchange for sexual activities with a child;
- giving goods, money, attention or affection in exchange for images of a child for the purpose of sexual gratification of themselves or others; or
- encouraging, forcing, or attempting to encourage or force a child:
 - to sexually touch or fondle another person;
 - to perform oral sex;
 - either to masturbate self or others, or to watch others masturbate; or
 - to engage in or watch any other sexual activity.

Sexual abuse of a child does not include:

- sex education with the prior consent of a parent or guardian; or
- age appropriate consensual sexual behaviour between peers (i.e. the same or a similar age).

Sexual abuse of a child commonly has the following characteristics:

- it usually starts with something minor and gradually builds up to more involved behaviours through a process of grooming;
- it is secretive and generally known only to the abuser and victim, making it extremely difficult to detect;
- it is perpetrated by someone known to the child and/or held in a position of trust by the child or their parents or guardians; and
- it is rarely a self-contained or one-off incident but rather part of an ongoing relationship that is corrupting and distorting.

GROOMING

Grooming refers to actions deliberately undertaken with the aim of engaging and influencing an adult or a child for the purpose of sexual activity.

In the case of sexual abuse of a child, an offender may groom not only the child, but also those close to the child, including the child's parents or guardians, other family members, clergy and church workers. Grooming can include providing gifts or favours to the child or their family.

In the case of sexual abuse of an adult, an offender may groom not only the adult, but also those close to them, including their children, clergy and church workers.

Sexual abuse of a child is often preceded by grooming. Grooming actions are designed to establish an emotional connection to lower the child's inhibitions, through the development of a relationship with the child and increased opportunity to see the child. Grooming involves psychological manipulation that is usually very subtle, drawn out, calculated, controlling and premeditated. Typically, grooming occurs incrementally: accessing the victim, initiating and maintaining the abuse, and concealing the abuse.

All Australian jurisdictions have grooming offences, which vary in scope and application. Grooming offences may target online or other electronic communications, subjecting children to child exploitation material, and/or using intoxicating substances to engage children for the purpose of sexual activity.



CHARACTERISTICS OF SEXUAL OFFENDERS

Sexual offenders generally:

- do not stop unless there is some intervening factor;
- believe or assert that the victim is complicit or a willing participant;
- attempt to deny, justify, minimise or excuse their behaviour by:
 - claiming their behaviour was an expression of love for the victim;
 - claiming their behaviour was a result of their childhood abuse;
 - claiming their behaviour was influenced by stress, the use of alcohol or other substances; and
 - blaming the victim;
- enjoy the activity, despite claims to the contrary; and
- are repeat offenders.

Sexual offenders who target vulnerable adults and children will often undertake a grooming process as a precursor to abusive behaviour.

SPIRITUAL ABUSE

Spiritual abuse means the mistreatment of a person by actions or threats when justified by appeal to God, faith or religion. It includes:

- using a position of spiritual authority to dominate or manipulate another person or group;
- using a position of spiritual authority to seek inappropriate deference from others;
- isolating a person from friends and family members; or
- using biblical or religious terminology to justify abuse.

APPROPRIATE AUTHORITY

Appropriate authority in a School refers to members of the senior leadership team who include, but are not limited to:

- The Principal as the Head of the School. Also commonly referred to as Headmaster.
- The Deputy Principal, Heads of School, Assistant Heads, Deputy Heads, Deans and Directors.

Appropriate authority in an ECS refers to the Director/Coordinator or Nominated Supervisor of the Service.

In some circumstances (e.g. complaints), Schools owned or controlled by ACSQ or ECS for which ACSQ is the Approved Provider, the Chair of the school council or ECS management committee or the Executive Director, Anglican Schools Commission may be considered as an appropriate authority. For other Anglican Schools or ECS, the Chair of the School's governing body or ECS management committee may be considered an appropriate authority.

APPROPRIATE AUTHORITY FOR FINANCIAL MANAGEMENT

A person with appropriate authority for financial management in a School or ECS includes roles such as Business Manager, Finance Manager, Chief Financial Officer or equivalent positions, as described in their position descriptions. In some ECS this role may be undertaken by the voluntary position of Treasurer as part of the ECS management committee.



APPROPRIATE SUPPORTS FOR CHILDREN AND YOUNG PEOPLE

Appropriate supports may include:

- support within the child's family, such as parents, guardians, other adult family members and older siblings;
- support within the school, such as teachers, counsellors, chaplains, or other adults or older young people who have a relationship with the child and have the skill to sufficiently support the child, for example coaches or school leaders; or
- supports within the community, such as Kids Helpline, Headspace or similar, counsellors or psychologists, Church/parish supports.

CHILD/REN AND YOUNG PEOPLE

A child means anyone under the age of 18 years. The terms child and/or young person are both used to reflect that this Code applies to persons enrolled or recently enrolled (e.g. within two years) at a School or ECS. This includes young people who are 18 years or older. Children and young people are also commonly referred to as students.

CHILD EXPLOITATION MATERIAL

Child exploitation material means material that describes or depicts a person who is or who appears to be a child:

- engaged in a sexual activity;
- in a sexual context; or
- as the subject of torture, cruelty or abuse (whether or not in a sexual context);

in a way that a reasonable person would regard as being, in all the circumstances, offensive. Child exploitation material can include any film, printed matter including text, electronic data, computer image or any other depiction including drawing.

CHILD PORNOGRAPHY

Child pornography means sexually explicit or suggestive material depicting children and is a form of child exploitation material.

CHURCH

Church means the Anglican Church of Australia.

CHURCH AUTHORITY

Church authority means the person or body having authority to ordain, license, appoint, dismiss or suspend a member of the clergy or church worker.

CHURCH BODY

A Church body means any body corporate, organisation or association that exercises ministry within, on behalf of, or in the name of the Church, and is controlled by a diocese or province or the General Synod.

CIVIL AUTHORITIES

Civil authorities means the police and the relevant Queensland government child protection authority.

CONFLICT OF INTEREST

A conflict of interest is a situation in which someone in a position of trust has competing professional or personal interests. A conflict may exist even if no unethical or improper acts result. A conflict can create an appearance of impropriety that can undermine confidence in the person or the School/ECS.

CORPORAL PUNISHMENT

Corporal punishment means any punishment inflicted on the body.

EDUCATION AND CARE SERVICE (ECS)

An ECS is a service regulated by the *Education and Care Services National Law (Queensland)* and related regulations.



INAPPROPRIATE BEHAVIOUR

Inappropriate behaviour, as relevant to a School/ECS, is behaviour of a sexual, physical or psychological/emotional nature which exploits the special position of trust and authority between the staff member or volunteer and a child, and is unacceptable.

Such inappropriate behaviour may include, but is not limited to:

- transporting a student or seeking to visit a student at home without the written consent of a parent and the approval of the Principal;
- inviting a student to the staff member or volunteer's home;
- sending or receiving correspondence of an inappropriate nature or inappropriate giving of gifts;
- physical or emotional aggression, violence or bullying;
- sexual exhibitionism or exposing a student to pornographic material in any medium;
- development of an intimate relationship incompatible with the professional relationship;
- inappropriate discussion of sexual matters or use of obscene language, especially of a sexual nature;
- gestures, actions or jokes of a suggestive, obscene or sexual nature while in a student's presence;
- voyeurism (gaining pleasure from secret watching of another);
- repeatedly seeking to be alone with a student; or
- detaining a student in locked facilities or facilities that do not have immediate access to other staff.

INAPPROPRIATELY DISCRIMINATE

Inappropriate discrimination occurs when a person takes adverse action against another because of a protected attribute. Protected attributes include: race, colour, sex, sexual orientation, age, physical or mental disability, marital status, family or carer's responsibilities, pregnancy, religion, political opinion, national extraction, or social origin.

Adverse action isn't always discrimination. There can be lawful reasons that have nothing to do with someone's personal characteristics. It is not discrimination if the actions:

- are allowed under state or federal anti-discrimination law;
- are taken against an employee of a religious institution to avoid harming the organisation's religious beliefs;
- do not relate to one of the protected attributes; or
- relate to the necessary requirements of the job.



OFFENSIVE LANGUAGE

Offensive language includes blasphemy, verbal harassment, racial and other forms of vilification, personal insult or comment and obscene words.

PROHIBITED MATERIAL

- Publications, films and computer games that have been classified by the Office of Film and Literature Classification as being unsuitable for a child to read, see or play;
- Any other images or sounds not subject to classification by the Office of Film and Literature Classification, that are considered, with good reason within the Church, to be unsuitable for a child to see or hear; or
- Any substance or product whose supply to or use by children is prohibited by law; such as alcohol, tobacco products, illegal drugs and gambling products.

PROHIBITED SUBSTANCE

Prohibited substance means any substance banned or prohibited by law for use or consumption.

RESTRICTED MATERIAL

- Publications, films and computer games that have been classified as Category 1 or 2 restricted, or X or RC classification, by the Office of Film and Literature Classification; and
- any other images or sounds not subject to classification by the Office of Film and Literature Classification (for example, internet material), that are considered, with good reason within the Church, as being offensive on the grounds of violence, sex, language, drug abuse or nudity.

RISK MANAGEMENT PLANS

Risk management plans are required for high risk activities and special events, in ECS these are also commonly referred to as risk assessments. Example issues for consideration in a risk management plan include:

- screening and selection of personnel;
- your role and capacity to perform it;
- use of external service providers;
- supervision;
- planning and conduct of activities;
- venue;
- health and safety;
- transport;
- disciplinary arrangements;
- physical contact;
- photographs and images; and
- record keeping.



RISK MANAGEMENT STRATEGY

In Queensland, the *Working with Children (Risk Management and Screening) Act 2000* and *Regulations 2011*, requires our Schools and ECS to have a Child and Youth Risk Management Strategy that implements employment practices and procedures to promote the wellbeing of a child affected by the regulated employment or regulated businesses undertaken as part of the School/ ECS and to protect the child from harm. The Strategy must refer to the following:

- a statement about commitment to the safety and wellbeing of children and the protection of children from harm;
- code of conduct for interacting with children;
- procedures for recruiting, selecting, training and managing persons engaged or proposed to be engaged by the School/ECS, as the procedures relate to the safety and wellbeing of children and the protection of children from harm;
- policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines;
- a plan for managing breaches of the risk management strategy;
- policies and procedures for compliance with the Act, chapter 8, including policies and procedures regarding -
 - implementing and reviewing the risk management strategy; and
 - keeping a written record of matters under the Act, chapter 8 about each person engaged by the School/ECS;
- risk management plans for high risk activities and special events;
- strategies for communication and support, including -
 - written information for parents and persons engaged by the School that includes details of the risk management strategy or where the strategy can be accessed; and
 - training materials for persons engaged by the School/ECS to -
 - * help identify risks of harm and how to handle disclosures or suspicions of harm; and
 - * outline the risk management strategy.

SCHOOL

A School is a non-state school administered by the *Education (Accreditation of Non-State Schools) Act 2017* and related regulations.

SERVICE

The action of helping or doing work for someone.

STAFF

A staff member is a person who is employed by a School/ECS where this Code is part of their employment contract or who has otherwise agreed to this Code.

SUPERVISOR

A supervisor is a person who supervises a person or an activity. This includes, but is not limited to, for child safety matters in schools, the Student Protection Officers.

VOLUNTEERS

Consistent with the *Working with Children (Risk Assessment and Screening) Act 2000*, a person undertaking work for a School/ECS without receiving financial reward where this Code is part of their agreement or who has otherwise agreed to this Code. 'Undertaking work' is understood to mean holding a position or performing a function with the actual or apparent authority of the School/ECS. This includes, but is not limited to unpaid members of school councils or ECS management committees.

Note, certain screening exemptions apply to some volunteers.



Our Commitment: *Creating environments for children and young people to thrive - A Code of Conduct for Anglican Schools and Education & Care Services* was first published by the Anglican Schools Commission, Anglican Church Southern Queensland, as version 1.1 in April 2019, following approval by the Standing Committee of the General Synod, Anglican Church of Australia.

Should additional information or assistance be required, please contact the Anglican Schools Commission:

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Appendix 2

Protecting Children and Young People in Anglican Education – Policy

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1. POLICY STATEMENT

Every **child** and **young person** has the right to be safe. Protecting, caring and supporting children and young people is of paramount importance, and Anglican Schools (Schools) and Education & Care Services (Services) have zero tolerance to **harm**.

The purpose of the *Protecting Children and Young People in Anglican Education Policy* (this Policy) is to provide a foundation for responding appropriately to **concerns** for the physical and psychological **safety** of children and young people in relevant Schools and Services.

Applying this Policy, all persons within a School or Service will act in a manner that gives primary consideration to:

- being child focused, where the safety and wellbeing of children and young people is paramount;
- identifying, reducing or removing risks of harm to children and young people;
- concerns being taken seriously, reflected in matters being responded to promptly, thoroughly and in keeping with the requirements detailed within this Policy and the *Protecting Children in Anglican Education Guidelines and Procedures* (the Procedures).

This Policy compliments the *Working with Children in Anglican Education Policy*, which reflects Schools' and Services' commitment and capacity to create nurturing and inclusive environments, where the children and young people they serve both feel and are safe; and establishes responsibilities for the application of **child safe principles** and practices within their operations.

This Policy assists Schools and Services to apply the *Statement of Commitment*, detailed in the *Working with Children in Anglican Education Policy*, specifically the commitments to;

- create conditions that increase the likelihood of identifying harm where it exists; and
- respond swiftly and appropriately to any concerns, disclosures, allegations or suspicions.

By focusing on the safety needs of the child or young person, this commitment extends to supporting safety both within the School or Service environment and beyond. This recognises that supporting the safety needs of children and young people is intrinsically connected to creating an environment where children and young people can thrive.

2. ADMINISTRATION

This Policy is published by the Anglican Schools Commission (ASC), on behalf of the Anglican Church Southern Queensland (ACSQ).

Key terms in this Policy are indicated in bold when first used and defined in Appendix A of this policy.

This Policy is to be read in conjunction with the Procedures.

This Policy supports compliance with relevant legal and canonical requirements as listed in section 11: Legislation, Canon and Other Relevant Documents. Some of these requirements have associated civil or criminal penalty. The Procedures include a summary of notable requirements and how they are reflected within this Policy.

3. SCOPE

The ACSQ requires compliance with this Policy and associated Procedures by all Anglican Schools and Services within the Brisbane Diocese (see Appendix B). Other Anglican Schools in Queensland (the North Queensland Diocese) have permission to use this Policy and the Procedures.

Appropriate to their responsibilities, this Policy and the Procedures apply to all children and young people; **parents**, carers and guardians; and **staff, volunteers** and **visitors** in a School or Service.

Delegations made by each governing body as part of this Policy are detailed in Appendix C. This list of delegations is reflective of all Schools and Services governed by the ACSQ (see section 10.9 and Appendix B).

The governing body of each Separately Incorporated Anglican School and Service will need to review this appendix and amend as appropriate to their circumstances, ensuring their own version is published alongside this Policy, noting that all delegations must be made by documented unanimous resolution of the governing body and have the written agreement of the delegate to accept such responsibility. Also note some delegations cannot be made to a staff member of a School or Service and must be made to a suitably qualified individual.

4. PROCEDURES

This Policy is operationalised in the Procedures.

Compliance with the Procedures is mandatory. However, the protection of children and young people requires vigilance and may require decisive action in a range of circumstances. People bound by the Policy and the Procedures are expected to apply their judgement to ensure that the objective of protecting children and young people is achieved in all circumstances. This may, in particular circumstances, require action beyond that or in shorter timeframes than that which is specifically contemplated by the Procedures. Guidance, such as that available from the ASC, will always be available to assist in this regard and should be sought in any situation where required.

The Procedures are approved and maintained by the ASC.

5. COMPLAINTS

Non-compliance with this Policy and the Procedures is not acceptable (refer to section 6. Breaches).

If a person has concerns about potential non-compliance with this Policy and the Procedures, the process in the complaints management policies and procedures, published by the ASC, apply. This process applies to all Anglican Schools and Services in the Brisbane Diocese.

In addition to this, relevant persons may also consider the application of the whistleblower policy and procedures, published by the ASC or, for separately incorporated schools or services, their own such processes.

Complaints are to be made in good faith. Persons who are found to have made complaints which are vexatious, or not made in good faith, may face disciplinary action by the relevant School or Service, or the ASC.

6. BREACHES

A breach of this Policy or the Procedures may be:

- (a) a disciplinary matter for the ASC or the relevant School or Service (which may result in performance management, formal warning, suspension, demotion, or termination in accordance with industrial processes or, in the case of a Licensed person, disciplinary action by the ACSQ or a related entity);
- (b) a contractual matter (breach or repudiation);
- (c) professional misconduct referred to relevant authorities;
- (d) a breach of statute referred to relevant authorities;
- (e) a criminal matter referred to relevant authorities; or
- (f) a civil matter referred for legal advice and remedy.

Any disciplinary process in relation to a breach of this Policy or the Procedures, will be managed with procedural fairness and in keeping with the principles of natural justice.

Schools, Services and the ASC retain discretion regarding how to respond to breaches of this Policy or the Procedures, unless legislation requires a definitive course of action.

A potential or actual breach of this Policy or the Procedures may expose Schools, Services and the ASC/ACSQ to significant damage to the trust afforded to it and to public scrutiny. These factors will be taken into account when considering the scope of any allegations of breaches of this Policy or the Procedures, and any disciplinary action that may be taken as a result.

7. ACCESSIBILITY

To assist in informing children, families and communities of Schools' and Services' responsibilities and obligations to uphold child safety and wellbeing, information is made available publicly online and upon request. This includes information about the commitment to child safety and wellbeing, behavioural expectations and complaint systems.

As such, this Policy and the Procedures, and those relevant to complaints, must be accessible, especially by members of the School or Service community, including children and young people; parents, carers and guardians; and staff, volunteers and visitors. Relevant documents will be published on the ASC website, and on the website of each School or Service. This includes child and youth friendly versions.

Each School or Service must also detail their localised approach to providing access to these Policies and Procedures within their respective **Child and Youth Risk Management Strategy**.

8. APPROVAL, FEEDBACK AND REVIEW

This Policy is developed and published by the ASC and is approved by Diocesan Council, ACSQ.

The ASC welcomes feedback on the Policy and will actively seek such feedback from key stakeholders at times of review.

This Policy will be formally reviewed in three years, when underlying legislation changes, or as required on request of either Diocesan Council or the ASC. The ASC will monitor this Policy for continuing application, commencing a formal review process earlier if needed. In addition to this, whenever required to maintain accuracy, the ASC will make changes to this Policy. The decision as to who approves any changes will be made based on whether the change is material in nature. Changes to the Policy will be explained in section 12 of this Policy: Version Control and communicated to Schools and Services for their local implementation.

9. OVERVIEW

This Policy details the Responsibilities of each person and entity to which this Policy relates. The responsibilities of each person and entity can be found in the following sections of this Policy:

Person	Responsibilities
All persons	10.1
Volunteers	10.1 and 10.2
Staff	10.1 and 10.2
Mandatory Reporters (teachers, registered nurses and doctors, and education and care professionals)	10.1, 10.2 and 10.3
Student Protection Officers	10.1, 10.2, 10.3 and 10.4
Nominated Supervisors	10.1, 10.2, 10.3, 10.4, 10.5, 10.7
Principals	10.1, 10.2, 10.3, 10.5 and 10.6
School Councils and Service Management Committees	10.1, 10.2 and 10.8
ACSQ and other governing bodies	10.1 and 10.9
Anglican Schools Commission	10.1 and 10.10

10. RESPONSIBILITIES

10.1 ALL PERSONS

All persons (including children and young people; parents, carers and guardians; and staff, volunteers and visitors in a School or Service) have the following responsibilities:

- (a) Act in the best interests of children and young people and behave in a manner that will not cause harm to a child or young person.
- (b) Agree to comply with any required behavioural expectations as directed by the School or Service. This includes, but is not limited to:
 - i. any applicable code of conduct or similar requirement;
 - ii. any role relevant to the implementation of the School or Service's Policy implementation and, responsibilities to provide care and manage risk of harm to children and young people.
- (c) Where there is a potential, perceived or actual concern:
 - i. for a child or young person associated with a School or Service; or
 - ii. about the conduct or behaviour of a person who has, or had, an association with children or young people through a School or Service;

children, young people and their families are encouraged; and staff, volunteers and visitors **must as soon as practicable**, share this information with an **Appropriate Person** associated with the School or Service, as detailed in the following table. This includes sharing information about concerns regarding a person's own conduct.
- (d) The term 'concern' relates to information of whatever nature and from whatever source that leads to a reasonable suspicion of circumstances that may have posed or continues to pose a risk to the physical or psychological safety of a child or young person. This includes, but may not be limited to:
 - i. incidents or allegations of sexual, physical, or other **abuse or inappropriate behaviour**;
 - ii. matters that are recent or historical in nature.
- (e) The term 'Appropriate Person' includes the following:

<i>Person with concern</i>	<i>Appropriate persons to share information with</i>
<i>Children and young people</i>	<p>Children and young people are asked to raise any concerns (impacting either themselves or their peers) with <u>an adult they trust</u>, so that the adult can help.</p> <p>Student Protection Officers (in Schools) and Responsible Persons and Nominated Supervisors (in Services) are particularly available to help.</p> <p>It is also recognised that friendship and support from peers is important to help children and young people feel safe and less isolated.</p>

<i>Visitors, including parents and carers</i>	i) In Schools: A Student Protection Officer or person with Appropriate Authority ii) In Services: A person with Appropriate Authority
<i>Volunteers and staff</i>	i) In Schools: A Student Protection Officer or the Principal ii) In Services: A Nominated Supervisor or the Approved Provider
<i>(staff are also to refer to relevant sections below regarding statutory reporting obligations)</i>	Where required to guide the application of the Policy, volunteers and staff are also able to share information with staff from: i) The Anglican Schools Commission ii) The Office of the Director of Professional Standards (regarding sexual misconduct)

- (f) All reasonable steps are expected to be taken to prevent abuse and reduce risk of harm to children and young people. The obligation to share concerns with an Appropriate Person is essential given the duty of care owed to children and young people, and statutory reporting obligations under legislation (note, statutory reporting obligations can be found in the Procedures).
- (g) If a person is unsure about whether to share the information, then the information is to be shared.
- (h) Any concern can be shared in writing however this should not impede the person from informing the Appropriate Person of the concern in a timely manner. For staff, where the matter relates to physical or sexual abuse, this information must be provided in writing through commencement of a Protection Form. In addition to this, any adult may be asked by the Appropriate Person to document the concern they are sharing information about in writing, however the absence of such does not remove the Appropriate Person's responsibility to respond.
- (i) Where the concern identified by an **adult student**, visitor, volunteer or staff member, causes the person to believe on reasonable grounds that a child sexual offence is being or has been committed against a child by another adult, the person who has identified the concern is required to disclose the concern to the Police. A report to Police may not be required in certain circumstances, including where the person who identified the concern believes on reasonable grounds that the concern has already been disclosed to the Police. It is therefore appropriate for the Principal (School), Nominated Supervisor (Service), or another delegate of the governing body to inform the person when their concern has been reported to Police.
- (j) Participate in relevant induction and education as directed by the School or Service (see section 10.5.1 of this Policy).

10.2 STAFF AND VOLUNTEERS

Volunteers and staff members in Schools and Services have the following additional responsibilities:

- (a) Be attuned to signs of harm, and where appropriate to their role, facilitate child-friendly ways for children to express their views, participate in decision making and raise their concerns.
- (b) Seek support and guidance as necessary on how to effectively support children's safety and wellbeing, especially where there is any uncertainty in applying this Policy and the Procedures.

(c) Maintain confidentiality, information sharing and record keeping requirements detailed in the Procedures.

(d) Where there is a reasonable suspicion that an individual has been non-compliant with, or has breached, this Policy and the Procedures, follow the complaints process detailed in section 5 of this Policy.

(e) FOR STAFF: Immediately prepare a written report when they become aware, or reasonably suspect, in the course of their employment at the School or Service, that a child, young person or student has been, is being or is likely to be, **sexually abused** by another person.

- i. This written report is to be provided:
 - For Schools: to the Principal; or
 - For Services co-located with a School: to both a Nominated Supervisor and the Principal; or
 - For other Services: to the Nominated Supervisor; or
 - Where the concerns relate to the Principal: to a Director of the School's governing body, or their delegate (see section 10.9 and Appendix B);
 - Where concerns relate to the Nominated Supervisor: to the Approval Provider, or their delegate (see section 10.9 and Appendix B).
- ii. This report must include:
 - the name of the person giving the report (the first person);
 - the child or young person's name and sex;
 - details of the basis for the first person becoming aware, or reasonably suspecting, that the child or young person has been sexually abused, or is likely to be sexually abused, by another person;
 - details of the abuse or suspected abuse;
 - any of the following information of which the first person is aware:
 - the child or young person's age;
 - the identity of the person who has sexually abused, or is suspected to have sexually abused, the child or young person;
 - the identity of anyone else who may have information about the abuse or suspected abuse.

10.3 MANDATORY REPORTERS TO CHILD SAFETY

Mandatory reporters to Child Safety have the following additional responsibilities:

(a) The following relevant persons are to make a written report to **Child Safety** when, during the course of the person's engagement as a relevant person, they form a reportable suspicion that a child is **in need of protection** due to physical or sexual **abuse**:

- i. **Teachers;**
- ii. **Registered nurses** and doctors;
- iii. **Education and care professionals.**

(b) This report must include information known about:

- i. the basis on which the person has formed the reportable suspicion;

- ii. the child's name, sex and age;
- iii. details of how to contact the child (e.g. the address at which the child usually lives; or the name and address of the school the child attends);
- iv. details of the harm to which the reportable suspicion relates;
- v. particulars of the identity of the person suspected of causing the child to have suffered, suffer, or be at risk of suffering, the harm to which the reportable suspicion relates;
- vi. particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates.

10.4 STUDENT PROTECTION OFFICERS (SCHOOLS) AND NOMINATED SUPERVISORS/THEIR DELEGATE (SERVICES)

Student Protection Officers and Nominated Supervisors have a vital role in helping create a safe environment for children and young people, and helping the School and Service meet their child safety responsibilities. This includes, but may not be limited to, the following additional responsibilities:

- (a) Be a key contact person and support for children and young people when they are concerned for their own, or another child or young person's safety or wellbeing, or are reporting the conduct of any person in an Anglican School or Service that a child or young person considers as **inappropriate behaviour** or abuse;
- (b) Be a key contact person and support for families, volunteers, staff or visitors relevant to concerns for a child or young person's safety, or the conduct of any person in an Anglican School or Service that may be inappropriate behaviour or abuse;
- (c) Facilitate the identification and gathering of information that will assist in determining the most appropriate responses to concerns, such as whether a matter meets the threshold for reporting to Child Safety or Police for their investigation;
- (d) Report to Child Safety where there is a reasonable suspicion that a child is in need of protection from any type of abuse or neglect, including an unborn child who may be in need of protection after they are born;
- (e) Whenever identified as being of assistance, consult with the Child Safety Advocate, from the ASC, regarding the application of this Policy and the Procedures in practice;
- (f) Assist the Principal (Schools) and Approved Provider (Services) in meeting their responsibilities, as outlined in this Policy.

10.5 PRINCIPALS (SCHOOLS) AND NOMINATED SUPERVISORS (SERVICES)

10.5.1 IMPLEMENTATION OF POLICY

Principals and Nominated Supervisors are responsible for facilitating the implementation of this Policy and the Procedures at all levels of the School or Service. This includes, but may not be limited to, the following additional responsibilities:

- (a) Ensure effective systems are in place within the School or Service to be able to access and evidence the agreement of all persons, which must be obtained prior to their commencement in their intended role, to comply with any relevant behavioural expectations as directed by the School or Service, including this Policy and the Procedures.
- (b) Ensure all reasonable steps are implemented to prevent abuse and reduce risk of harm to children and young people. This applies to:
 - i. Identifying and managing risks of harm or abuse to children and young people when they are under the care, supervision, control or authority of the School or Service; and
 - ii. Identifying and managing risks of harm or abuse to children and young people when they are not under the care, supervision, control or authority of the School or Service. This may include referring a matter to Child Safety or Police.
- (c) Ensure, as developmentally appropriate, children and young people meaningfully participate in the effective implementation of the Policy within the School or Service.
- (d) Ensure this Policy and the Procedures are made available, and relevant changes to this Policy or the Procedures, are notified to any relevant stakeholder, including, as is developmentally appropriate, children and young people; parents, carers and guardians; and staff, volunteers and visitors.
- (e) Ensure information, training and instruction necessary to protect children and young people from risks to their safety, and relevant to this Policy, is provided; noting the following minimum requirements:

Person	Minimum requirements
Children and young people	<p>Developmentally applicable, and culturally safe and appropriate information is provided on how to seek assistance and report any concerns. This includes, but may not be limited to:</p> <ul style="list-style-type: none"> • what child safety and wellbeing means; • the organisation's commitment to child safety and wellbeing, and how this is implemented in operations. This includes who to talk to within the School or Service, and any relevant information about the School or Service's risk management strategy; • rights and responsibilities, e.g. regarding safety, information and participation; • safe, inclusive environments and protective, proactive and responsive strategies to safety and wellbeing.

Person	Minimum requirements
	In part, this may occur through the use of developmentally appropriate abuse prevention and respectful relationships programs/content.
Visitors, volunteers and staff	<p>Be provided with information on their responsibilities relevant to this Policy.</p> <p>The nature of this information will be determined by the School or Service, as relevant to the purpose of the person's role and responsibilities, and:</p> <ul style="list-style-type: none"> • must first occur prior to the person commencing their intended role; • can occur through either verbal presentation or through written material (including, for example, information provided and agreed to on sign in to the School or Service); • must occur on at least an annual basis.
Staff and volunteers (in addition to above)	<p>Are equipped, through ongoing education and training as relevant to their role, with the knowledge, skills and awareness to help children and young people have their safety needs met.</p> <p>Schools and services will provide information (including training materials) to support volunteers and staff, to understand matters related to the school or service's child and youth risk management, and the role they have in helping to manage risks, such as:</p> <ul style="list-style-type: none"> • helping to create environments that reduce the opportunity for abuse or harm to occur, and embed proactive strategies aimed at preventing harm and enhancing wellbeing; • being attuned to signs of harm and abuse and helping identify risks of harm and abuse to children and young people, including harm and abuse caused by other children and young people; • helping facilitate child-friendly ways for children and young people to express their views, participate in decision making and raise their concerns; • helping handle disclosures or suspicions of harm and abuse to children; • supporting colleagues who disclose harm or abuse; • understanding the existence and application of applicable law and any obligations that they may have under that law; and • effectively implementing the organisation's relevant policies and related processes, focused on responding effectively to issues regarding child safety and wellbeing. <p>For volunteers and short term/seasonal and new staff, this information will be made available through induction , whereas for staff in continuous service this will occur through annual training (discussed below).</p>

Person	Minimum requirements
<i>Staff, and members of a School Council, or Education and Care Service Management Committee (in addition to above)</i>	<p>Are trained annually in:</p> <ul style="list-style-type: none"> • using training material provided by the ASC (including in the processes detailed in this Policy and the Procedures) and • information on local implementation as provided by the School or Service.
<i>Student Protection Officers and Nominated Supervisors (in addition to above)</i>	<p>Participate in:</p> <ul style="list-style-type: none"> • Schools: Student Protection Officer Induction (administered by the ASC) prior to commencing in the role; • Services: Child Protection Leadership Induction (administered by the ASC); • Professional development as arranged by the ASC.

(f) Ensure effective systems are in place for the School or Service to meet confidentiality, information sharing, and record keeping and retention requirements as detailed in the Procedures.

(g) Ensure effective systems are in place for actual or perceived conflicts of interest to be declared and managed so as, where-ever possible, decisions are not made, or the management of matters are not influenced, by the staff member with the conflict.

10.5.2 ASSURANCE

In respect of assurance, Principals and Nominated Supervisors have the following additional responsibilities:

(a) Ensure effective systems are in place for the School or Service to evidence that responsibilities have been met and that this Policy and the Procedures have been implemented and abided by.

(b) Ensure the School or Service participation in quality assurance processes, as directed by the ACSQ or a regulatory authority.

(c) Arrange for internal reporting to themselves and either the School Council or the ECS Management Committee, on at least a quarterly basis. At minimum, reporting must include the following:

- information evidencing effective implementation of this Policy and the Procedures;
- learnings from the application of this Policy and related matters, to the management of the School or Service, including strategic risks;
- details of staff allocated and systems in place to support operations related to this Policy;
- details of how relevant people within the School or Service community are made aware of, given access to and trained in, implementing this Policy and the Procedures, as described in this Policy;
- the number of concerns raised and matters reported to each statutory authority; and
- any issues in the management of concerns that are relevant to the leadership and governance associated with developing and maintaining a child safe culture.

(d) Report to the governing body, or to their delegate (section 10.9 and Appendix C), on at least an annual basis and on request, to provide information regarding effective implementation of this Policy and the Procedures, and communicate any issues relevant to their governance responsibilities.

Note: Where a School or Service is controlled by the ACSQ a copy of this report is to be provided to the Executive Director, ASC (see Appendix B).

10.5.3 MANAGEMENT OF SPECIFIC MATTERS

In respect of the management of specific matters, Principals and Nominated Supervisors have the following additional responsibilities:

(a) Assist all persons to meet their reporting responsibilities through implementing processes described in this Policy and the Procedures.

(b) Immediately provide all written reports of reasonable suspicions of sexual abuse or likely sexual abuse of a child, or another person who otherwise meets the definition of student; or a reasonable belief of a child sexual offence committed by an adult, to:

- i. a Police Officer, Queensland Police Service, and
- ii. where the Principal or Nominated Supervisor is also the person who formed the reasonable suspicion (the first person), a director of a school's governing body, Approved Provider of a service, or their delegate (see section 10.9 and Appendix C)

Please refer to the Procedures for information on reasonable excuses for not reporting a child sexual offence to Police.

(c) Where an adult student, visitor, volunteer or staff member raises a concern relating to a reasonable belief of a child sexual offence committed by an adult; inform the staff member, volunteer or visitor, in writing, when their concern has been reported to Police.

(d) Ensure reporting to Child Safety of all reasonable suspicions a child is in need of protection from any type of abuse or neglect, including an unborn child who may be in need of protection after they are born.

(e) As soon as practicable (usually immediately) report all concerns related to:

- i. the potential or alleged inappropriate behaviour by a past or current staff member or volunteer
- ii. additional matters potentially significant impact on the strategic operation of the School or Service

to a director of a school's governing body, Approved Provider of a service, or their delegate (see section 10.9 and Appendix C).

(f) Consistent with the responsibilities of School Councils and Service Management Committees, as soon as practicable, brief and share information with the Chair of the Council/Committee on all

matters potentially impacting the strategic operation of the School or Service, including information on the process followed to manage the matter.

(g) Notify and work collaboratively with the Queensland College of Teachers (QCT) regarding the management of relevant matters.

- i. For School Principals notifications include:
 - as soon as practicable after starting to deal with an allegation of harm caused or likely to be caused to a child because of the conduct of a relevant teacher;
 - as soon as practicable after stopping dealing with the allegation for any reason, notify QCT of the outcome;
 - within 14 days of a notice of dismissing a teacher, or giving a notice of dismissal to a teacher, notify QCT where circumstances call into question the teacher's competency to be employed as a teacher.
- ii. For Nominated Supervisors, where the relevant teacher is employed in a Service (and not a School where (i) applies), a complaint is to be made to the Queensland College of Teachers if the teacher is dismissed in circumstances that call into question the teacher's competency to be employed as a teacher.

(h) In addition to the above responsibilities, Principals and Nominated Supervisors are to ensure:

- i. initial and ongoing risk assessment occurs, and all reasonable precautions are subsequently implemented to identify, minimise and manage risks to children and meet duty of care responsibilities;
- ii. advice is sought from appropriate persons, whenever necessary, such as the Child Safety Advocate (ASC) and lawyers;
- iii. consideration is given to any actual or perceived conflicts, so as, where-ever possible, decisions are not made, or the management of matters is not influenced, by the staff member with the conflict;
- iv. appropriate actions to implement support for children and young people, their families, staff, volunteers and other relevant persons is taken, referring to other service providers (e.g. counselling) where appropriate;
- v. effective and appropriate communication occurs with relevant stakeholders;
- vi. human resource management responsibilities are met, including requirements relevant to employment law;
- vii. appropriate liaison and cooperation with statutory authorities such as Child Safety, Police and the Queensland College of Teachers;
- viii. consideration is given to notifying the School or Service's insurers;
- ix. at an appropriate time, relevant matters are analysed to identify any causes and systematic failures within the School or Service to inform continuous improvement.

10.6 PRINCIPALS

Principals have the following additional responsibilities:

- (a) Ensure there are a sufficient number of staff members (at least two) nominated as Student Protection Officers at the school; that they are accessible during school hours; and that their

identity and role is appropriately communicated to the school community, including children and young people; parents, carers and guardians; and staff, volunteers and visitors. Refer to Appendix D for template to document Student Protection Officer delegation.

(b) Ensure, wherever a child or young person is in the care, supervision, control or authority of the School, including, for example, in boarding, home stay or any other care arrangements administered, arranged or approved by the School; that each child or young person clearly understands who they can speak to when they have concerns.

10.7 NOMINATED SUPERVISORS

Nominated Supervisors have the following additional responsibilities:

(a) If delegating responsibilities under section 10.4 of this Policy, keep written evidence of the delegated responsibility and the communication of such delegation to, at minimum, the relevant staff member, the Service's Management Committee (where applicable), and the Approved Provider or their delegate (see section 10.9 and Appendix C).

NOTIFICATIONS TO THE REGULATORY AUTHORITY

(b) Ensure, as soon as practicable, all relevant matters are reported to the Approved Provider, or their delegate (see section 10.9 and Appendix C), to enable notification to the Department of Education, as the regulatory authority, including:

- i. any circumstance arising at the service where it is reasonable to suspect a risk to the health, safety or wellbeing of a child, or children, attending the service;
- ii. an allegation, concern or suspicion of physical abuse or sexual abuse of a child, or children, has occurred or is occurring while the child is, or the children are, being educated and cared for by the service;
- iii. serious incidents and complaints or allegations of serious incidents;
- iv. any complaints or allegations that the Education and Care Service National Law has been contravened, e.g. inadequate supervision, inappropriate discipline, or failure to protect from harm or hazard;
- v. any related disciplinary proceedings or suspension or cancellation of a teacher registration or working with children authority of a Nominated Supervisor within the Service.

(c) Nominated Supervisors are to provide, in sufficient detail and within required timeframes, all information required by either the Approved Provider (or their delegate) and the Department of Education.

10.8 SCHOOL COUNCILS AND SERVICE MANAGEMENT COMMITTEES

In addition to responsibilities detailed above for volunteers (10.1 and 10.2) School Councils and Service Management Committees are responsible for the following:

(a) Support effective implementation of this Policy and the Procedures.

(b) Support the School or Service and provide assurance to the governing body/ approved provider, regarding matters reported to them and the processes being followed (including matters reported to the Chair – see section 10.5.3(f)).

(c) On at least a quarterly basis, consider issues as reported by the School or Service relevant to:

- i. evidencing effective implementation of this Policy and the Procedures;
- ii. learnings from the application of this Policy and related matters, to the management of the School or Service, including strategic risks.

10.9 ACSQ AND OTHER GOVERNING BODIES

The ACSQ and other governing bodies (including directors of a School's governing body and Approved Providers of a Service) have the following responsibilities:

(a) The governing body of the School or Service will, by unanimous resolution, communicate any delegation of their responsibilities and arrange for such to be published alongside this Policy in Appendix C. Responsibilities relevant to this Policy include but may not be limited to the following matters, detailed in (c) to (i) below.

(b) The governing body of the School or Service will provide sufficient support for Schools and Services to effectively implement this Policy.

REPORTING OF SEXUAL ABUSE OR LIKELY SEXUAL ABUSE TO POLICE

(c) When receiving a report of a reasonable suspicion of sexual abuse or likely sexual abuse to a child, or other person that otherwise meets the definition of a student; or a reasonable belief of a child sexual offence committed by an adult, that is not known to have been reported to the Police:

- i. provide this report to the Police immediately; and
- ii. inform, in writing, any person who provided this report as part of their responsibilities detailed in this Policy, that the matter has been reported to the Police.

REPORTING TO THE REGULATORY AUTHORITY FOR EDUCATION AND CARE SERVICES

(d) Report to the Department of Education, as the regulatory authority, as required under *Education and Care Services National Law and Regulations*.

CONCERNS RELATED TO INAPPROPRIATE BEHAVIOUR AND OTHER MATTERS

(e) Receive reports regarding:

- i. alleged inappropriate behaviour by past or current staff members or volunteers
- ii. additional matters potentially significant impact on the strategic operation of the School or Service

(as per section 10.5.3(e)) and ensure concerns related to inappropriate behaviour are managed as per this Policy and applicable law or canon.

(f) Where a School or Service is governed or controlled by the ACSQ (see Appendix B), and the matter relates to **information** about sexual misconduct by a past or current staff member or

volunteer, the Director of Professional Standards will be one of the delegates tasked with meeting responsibilities in section 10.9(e).

(g) Provide concerns related to a **Licensed Person** to the **Bishop** or **Archbishop**.

ASSURANCE

(h) On at least an annual basis, or as requested by the ASC or a regulatory authority, consider issues as reported by the School or Service relevant to:

- i. evidencing effective implementation of this Policy and the Procedures;
- ii. learnings from the application of this Policy and related matters, to the management of the School or Service, including strategic risks.

(i) Provide direction and authority to the School or Service to participate in quality assurance mechanisms, such as audits, as directed by the ACSQ or a regulatory authority, the purpose of which is to provide assurance of compliance with this Policy.

10.10 ANGLICAN SCHOOLS COMMISSION

(A) CONSULTATION AND SUPPORT

Provide consultation and support on the application of the Policy and the management of related matters through the role of Child Safety Advocate.

(B) TRAINING

Provide training materials to Schools and Services to assist with implementation of this Policy. At minimum, this includes:

- (a) child protection training material for staff, school councils and service management committees, on relevant processes and responsibilities detailed in this Policy and the Procedures; and
- (b) induction training for School Student Protection Officers and Service leaders.

(C) POLICIES AND PROCEDURES

Publish this Policy and the Procedures to assist Schools and Services to meet requirements for such written processes.

11. LEGISLATION, CANON AND OTHER RELEVANT DOCUMENTS

In implementing this Policy, it is expected that Anglican Schools and Services will meet legal and canonical requirements; and apply the best practice approach described in referenced documents. Refer to the Procedures for further details.

LEGISLATION

- *Australian Charities and Not for Profits Commission Act 2012 and Regulation 2013 (Cth)*
- *Child Protection Act 1999 and Regulation 2011*

- *Civil Liability Act 2003 and Regulation 2014*
- *Criminal Code 1899*
- *Education (Accreditation of Non-State Schools) Act and Regulation 2017*
- *Education and Care Services Act and Regulation 2013*
- *Education and Care Services National Law 2018 and Regulation 2021*
- *Education and Care Services National Law (Queensland) Act 2011 and Regulation 2011*
- *Education (General Provisions) Act 2006 and Regulation 2017*
- *Education Services for Overseas Students Act 2000 (Cth)*
- *Education (Queensland College of Teachers) Act 2005 and Regulation 2016*
- *National Code of Practice for Providers of Education and Training to Overseas Students* (legislative instrument)
- *Work, Health and Safety Act and Regulation 2011*
- *Working with Children (Risk Management and Screening) Act 2000 and Regulation 2020*

CANON

- *Professional Standards Canon*
- *Safe Ministry to Children Canon*

REFERENCE DOCUMENTS

- National Principles for Child Safe Organisations, published by the Australian Human Rights Commission
- National Quality Standard, published by the Australian Children's Education and Care Quality Authority (ACECQA)
- National Strategy to Prevent and Respond to Child Sexual Abuse (2021-30), published by the National Office of Child Safety
- Protocol for Responding to Child Sexual Abuse and Sexual Misconduct, published by the ACSQ
- Working with Children in Anglican Education Policy and the Guidelines and Procedures

12. VERSION CONTROL

This Policy replaces both the Student Protection in Anglican Schools and the Child Protection in Anglican Education & Care Services Policies. This replacement includes any requirement to comply with these documents within a Code of Conduct or other like policy or other document.

Version	Date	Document owner	Comments
1.0	16/12/2021	Anglican Schools Commission	Approved by Diocesan Council
1.1	11/04/2021	Anglican Schools Commission	Minor changes, e.g. correct references to Appendices.

APPENDIX A: KEY TERMS AND DEFINITIONS

Abuse: Behaviour that causes, or could reasonably be expected to cause, harm. It can be a single incident, or several incidents that take place over time. For the purpose of this Policy and the Procedures, examples of Abuse includes:

- (a) A SEXUAL OFFENCE COMMITTED AGAINST, WITH OR IN THE PRESENCE OF A CHILD
 - (i) Sexual offences refer to criminal conduct of a sexual nature and includes:
 - (A) sexual assault
 - (B) indecent acts
 - (C) production or possession of child abuse material
 - (D) 'grooming' a child in order to commit a sexual offence. Grooming concerns predatory conduct undertaken to prepare a child for sexual activity at a later time.
- (b) SEXUAL MISCONDUCT
 - (i) Sexual misconduct includes behaviour, physical contact, speech or other communication of a sexual nature, inappropriate touching, grooming behaviour, and voyeurism. This captures a broader range of inappropriate behaviours of a sexual nature that are not necessarily criminal. Examples of sexual misconduct include:
 - (A) an adult developing a close and inappropriate relationship with a child which crosses professional boundaries
 - (B) an adult inappropriately discussing sex and sexuality with a child
 - (C) other overtly sexual acts that could lead the ASC to take disciplinary or other action.
- (c) PHYSICAL VIOLENCE
 - (i) Physical violence includes an act that causes physical injury or pain. Examples of physical violence can include:
 - (A) hitting/kicking/punching
 - (B) pushing/shoving/grabbing/throwing/shaking
 - (C) using an object to hit or strike
 - (D) using restraint or excessive force that is inappropriate to the situation.
 - (ii) Physical violence does not include lawful behaviour. For example:
 - (A) reasonable steps taken to protect a child from immediate harm, such as taking a child's arm to stop them from going into oncoming traffic
 - (B) medical treatment given in good faith by an appropriately qualified person, such as a senior first aid officer administering first aid.
- (d) BEHAVIOUR THAT CAUSES SIGNIFICANT EMOTIONAL OR PSYCHOLOGICAL HARM TO A CHILD
 - (i) Examples of behaviours that may cause emotional or psychological harm include:
 - (A) exposure to violence or threats of violence, including family violence
 - (B) persistent hostility/rejection
 - (C) humiliation/belittling
 - (D) scapegoating.
 - (ii) Please note the following does not constitute behaviour that causes significant emotional or psychological harm to a child:
 - (A) a person takes reasonable steps to protect a child from immediate harm

- (B) a person with responsibility for discipline takes lawful and reasonable disciplinary action, such as sending a child to sit in 'time out' for a period of time, in line with organisational policy
- (C) the conduct is related to providing medical treatment or care given in good faith, such as a first aid officer administering first aid.

(e) SIGNIFICANT NEGLECT OF A CHILD

(i) The neglect:

- (A) must be more than minor and insignificant
- (B) does not need to have a lasting or permanent effect
- (C) may be an ongoing situation or a one-off incident, as long as it is not minor in nature.

(ii) Examples of different types of neglect include:

- (A) supervisory neglect, which is the absence or inattention of a person which places the child at risk of physical harm or injury, sexual abuse or allows other criminal behaviour towards the child
- (B) physical neglect, which is the failure to provide basic physical necessities for a child, such as adequate food, clothing and housing
- (C) medical neglect, which is the failure to provide for appropriate medical care for a child, including a failure to acknowledge the seriousness of an illness or condition, or deliberately withholding appropriate care.

Also see: <https://aifs.gov.au/cfca/publications/what-child-abuse-and-neglect>

The Queensland Government publishes the following information on child abuse:

<https://www.cyjma.qld.gov.au/protecting-children>. This information is referenced here as it is published by the Department that administers the *Child Protection Act 1999*, including the requirement for relevant persons to notify reportable suspicions a child is in need of protection from physical or sexual abuse.

Adult student: a person enrolled as a student of a School who is 18 years or older.

All persons: All children and young people, **staff, volunteers** and **visitors** in the School or Service.

Appropriate Authority:

An Appropriate Authority in a School refers to members of the senior or executive leadership team who include, but are not limited to:

- The Principal.
- The Deputy Principal, Heads of 'Schools' (e.g. Junior, Middle, Senior), Assistant Heads, Deputy Heads, Deans and Directors.

An Appropriate Authority in an ECS refers to the Director/Coordinator or Nominated Supervisor of the Service.

In some circumstances (e.g. complaints), Schools owned or controlled by ACSQ or ECS for which ACSQ is the Approved Provider, the Chair of a school council or ECS management committee or the Executive Director, Anglican Schools Commission may be considered as an Appropriate Authority.

For other Anglican Schools or ECS, the Chair of the School's governing body or ECS management committee may be considered an Appropriate Authority.

Appropriate Person: the term 'Appropriate Person' will differ depending on the person who is reporting a concern. Please see the table below to ascertain who the 'Appropriate Person' would be in different circumstances.

<i>Person with concern</i>	<i>Appropriate persons to share information with</i>
<i>Children and young people</i>	<p>Children and young people are asked to raise any concerns (impacting either themselves or their peers) with <u>an adult they trust</u>, so that the adult can help.</p> <p>Student Protection Officers (in Schools) and Responsible Persons and Nominated Supervisors (in Services) are particularly available to help</p> <p>It is also recognised that friendship and support from peers is important to help children and young people feel safe and less isolated.</p>
<i>Visitors, including parents and carers</i>	<ul style="list-style-type: none"> • In Schools: A Student Protection Officer or person with Appropriate Authority • In Services: A person with Appropriate Authority
<i>Volunteers and staff</i> <i>(staff are also to refer to relevant sections below regarding statutory reporting obligations)</i>	<ul style="list-style-type: none"> • In Schools: A Student Protection Officer or the Principal • In Services: A Nominated Supervisor or the Approved Provider <p>Where required to guide the application of the Policy, volunteers and staff are also able to share information with staff from:</p> <ul style="list-style-type: none"> • The Anglican Schools Commission • The Office of the Director of Professional Standards (regarding sexual misconduct)

Approved Provider: Holds provider approval for the Education and Care Service under the *Education and Care Service National Law 2018*.

As soon as practicable: As soon as is able to be done (often immediately).

ASC: the Anglican Schools Commission.

Archbishop and Bishops: Refers to the Archbishop of Brisbane and the ACSQ Regional Bishops, as well as the Bishop of the North Queensland Diocese.

Child Abuse: Please see definition of *Abuse*.

Child and Youth Risk Management Strategy: Sections 171 and 172 of the *Working with Children (Risk Management and Screening) Act 2000* requires our Schools and Services to have a Child and Youth Risk Management Strategy that implements employment practices and procedures to promote the wellbeing of a child affected by the regulated employment or regulated businesses undertaken as part of the School or Service and to protect the child from harm.

Child safe principles: [National Principles for Child Safe Organisations](#) as published by the Australian Human Rights Commission.

Child Safety: Refers to the Queensland Department of Children, Youth Justice and Multicultural Affairs.

Children and young people: Consistent with *the Child Protection Act 1999*, a child means anyone under the age of 18 years. In addition to this, in this context, the terms child and/or young person are used. This includes young people who are 18 years or older where they are enrolled in an Anglican School. Children and young people are also commonly referred to as students (defined below).

Note: for the purpose of the Policy and the Procedure, requirements related to students apply to any child or young person associated with the School or Service or where the concern is obtained through a person's engagement with a School or Service.

Child sexual offences: Are detailed within the *Criminal Code 1899*.

Concern: Information of whatever nature and from whatever source, that leads to a reasonable suspicion of circumstances that may have posed or continues to pose a risk to the physical or psychological safety of a child or young person. This includes, but may not be limited to:

- incidents or allegations of sexual, physical, or other abuse or inappropriate behaviour;
- matters that are recent or historical in nature.

Conflict of interest: A conflict of interest is a situation in which someone in a position of trust or responsibility has competing professional or personal interests. A conflict may exist even if no unethical or improper acts result. A conflict can create an appearance of impropriety that can undermine confidence in the person or the School or Service.

Director of a school's governing body: As defined in section 9 of the *Education (Accreditation of Non-State Schools) Act 2017*. See Appendix A of the Policy for more information.

Education and care professionals: An individual, other than a volunteer or an individual under the age of 18, who is:

- (a) any of the following under the *Education and Care Services Act 2013*:
 - i. an approved provider;
 - ii. a supervisor for a QEC approved service;
 - iii. an educator for a QEC approved service; or
- (b) any of the following under the *Education and Care Services National Law (Queensland)*:
 - i. an approved provider;
 - ii. a nominated supervisor for an approved education and care service;
 - iii. an educator for an approved education and care service;
 - iv. a family day care co-ordinator for an approved family day care service;
 - v. a family day care educator for an approved family day care service.

Grooming: As defined in the *Professional Standards Canon*, means the cultivation of a relationship in order to:

- (a) initiate or hide sexual assault or abuse;
- (b) facilitate the procurement of a child to engage in a sexual act; or
- (c) expose, without legitimate reason, a child to any indecent matter.

In the case of child sexual abuse, an offender may groom not only the child, but also the child's parents or guardians, colleagues or other persons.

Harm: As defined in section 9 of the *Child Protection Act 1999* and the *Education (Queensland College of Teachers) Act 2005*: Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. Harm can be caused by a single act, omission or circumstance; or a series or combination of acts, omissions or circumstances.

In need of protection: As defined in section 10 of the *Child Protection Act 1999* a child in need of protection is a child who:

- (a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and
- (b) does not have a parent able and willing to protect the child from the harm.

Inappropriate behaviour:

- (a) is **sexual** in nature, including **grooming**, or
- (b) regardless of the nature of the behaviour, where it is reasonable to suspect this behaviour has placed a child or young person at risk of harm, caused harm, or there is a **likelihood of future harm**. For example, this includes behaviour defined as **abuse**.

Information: As defined in Professional Standards Canon, information of whatever nature and from whatever source relating to:

- (a) alleged conduct of a Church Worker wherever or whenever occurring involving sexual harassment or assault, or sexually inappropriate behaviour, grooming or the possession, making or distribution of child exploitation material;
- (b) alleged inappropriate or unreasonable conduct or omission of a Church Worker who had knowledge of (a); or
- (c) an alleged process failure.

Licensed persons: A person ordained to the order of bishop, priest or deacon within the Anglican Church of Australia. These are known as Holy Orders.

Likelihood of future harm: Relates to harm where it is reasonable to believe it will present later in a person's development. This includes harm that is likely to occur should the alleged inappropriate behaviour of concern continue.

Mandatory Reporter: Pursuant to s 13E of the *Child Protection Act 1999* a mandatory reporter is any of the following:

- (a) a doctor;
- (b) a registered nurse;
- (c) a teacher;
- (d) a police officer who, under a direction given by the commissioner of the police service under the *Police Service Administration Act 1990*, is responsible for reporting under this section;
- (e) a person engaged to perform a child advocate function under the *Public Guardian Act 2014*;
- (f) an early childhood education and care professional.

Nominated Supervisor: Means an individual who is nominated by the Approved Provider of the Service under the *Education and Care Service National Law 2017* to be a Nominated Supervisor of that Service; and who has provided written consent to that nomination.

Parent: Consistent with the *Child Protection Act 1999* and *Working with Children (Risk Management and Screening) Act 2000*, a parent is the child's mother, father or someone else having or exercising parental responsibility for the child, other than on a temporary basis.

Peers: a child or young person of similar age. For example, for a year 10 student, other high school students are their peers.

Principal: Consistent with the *Education (General Provisions) Act 2006*, the person responsible for the school's day-to-day management. Also known as a Head of the School, Headmaster/mistress or other similar title.

Procedures: Means the *Protecting Children and Young People in Anglican Education Guidelines and Procedures*

Policy: Means the *Protecting Children and Young People in Anglican Education Policy*

Reasonable belief: Means believes on grounds that are reasonable in the circumstances.

Reasonable suspicion: Means suspects on grounds that are reasonable in the circumstances.

Registered nurse: Consistent with the *Child Protection Act 1999* means a person registered under the *Health Practitioner Regulation National Law*:

- (a) to practise in the nursing profession, other than as a student; and
- (b) in the registered nurse's division of that profession.

Responsible Person: Consistent with the definition within section 162 of the *Education and Care Service National Law*, a Responsible Person includes:

- (a) the approved provider, if the approved provider is an individual or, in any other case, a person with management or control of an education and care service operated by the approved provider;
- (b) a nominated supervisor of the service;
- (c) a person in day-to-day charge of the service.

Safety: the condition of being protected from harm.

Sexual abuse: Sexual abuse is defined in section 364 of the *Education (General Provisions) Act 2006* as including sexual behaviour involving the student and another person, where:

- (a) The other person bribes, coerces, exploits, threatens or is violent toward the student; or
- (b) The student has less power than the other person; or
- (c) There is a significant disparity between the student and the other person in intellectual capacity or maturity.

Serious Incident: A Serious Incident includes:

- the death of a child at the ECS, or following an incident at the ECS
- any incident involving serious injury or trauma to a child where it could be reasonably expected the children required urgent medical attention from a registered medical practitioner, or attend a hospital (e.g. broken limb)
- any incident involving serious illness, where a child ought reasonably to have attended a hospital (e.g. anaphylaxis)
- any emergency for which emergency services attended
- any circumstance where a child appears to be missing or cannot be accounted for
- any circumstance where a child appears to have been taken or removed from the premises in a manner that contravenes Regulations, or
- any circumstance where a child is mistakenly locked in or locked out of the premises or any part of the premises.

Staff: A staff member is a person who is employed by the School or Service.

Student: Consistent with the *Education (General Provisions) Act 2006*, includes a student under 18 years attending the School; a kindergarten age child registered in a kindergarten learning program at the School; or a person with a disability who is being provided with special education at the School.

Student Protection Officers: A person appointed by the Principal under section 10.6. See the Procedures for further information.

Teachers: An approved teacher under the *Education (Queensland College of Teachers) Act 2005* employed at a school.

Visitors: Any person visiting the School or Service.

Volunteers: Consistent with the *Working with Children (Risk Assessment and Screening) Act 2000*, a person undertaking work for a School or Service without receiving financial reward. 'Undertaking work' is understood to mean holding a position or performing a function with the actual or apparent authority of the School or Service.

[Working with Children in Anglican Education Policy](#): As published by the Anglican Schools Commission

APPENDIX B: EXPLANATORY NOTES

The Anglican Church Southern Queensland (ACSQ) is also known as the Corporation of the Synod of the Diocese of Brisbane.

1. The ACSQ is the governing body for the following Schools and Services, and is supported by the Anglican Schools Commission, School Councils and Service Management Committees to effectively govern. For Services the ACSQ is also the Approved Provider.

Anglican Church Grammar School (Churchie)

Carey Lane Early Learning Centre (ELC)

Coomera Anglican College, ELC and Outside School Hours Care (OSHC)

Fraser Coast Anglican College, Koala Kindy and Roos Care OSHC

Rainbow Town ELC

St Alban's Wilston Early Childhood Centre

St Andrew's Anglican College, Little Saints ELC and OSHC

St Luke's Anglican School and ELC

St Hilda's School, Pre-preparatory and OSHC

St Paul's School and ELC

Sunnybank Anglican ELC

Sunnybank Anglican Parish OSHC

The Glennie School, Community Kindergarten and Pitstop OSHC

The Southport School and Pre-Preparatory School

Toowoomba Anglican School, Kindergarten and OSHC

West Moreton Anglican College

2. Separately Incorporated Anglican Schools and Services within the ACSQ catchment, with their own Company Board and governance structure are:

ACSQ controlled	Other
Cannon Hill Anglican College	All Saints Anglican School, Pre-Prep and OSHC
Oaklands ELC and OSHC (Churchie)	Canterbury College, ELC and OSHC
St John's Anglican College, Kindergarten and OSHC	Hillbrook Anglican School
The Springfield Anglican School and Tiny Tartans Kindy and OSHC	Matthew Flinders Anglican College, ELC and OSHC
	St Aidan's Anglican Girls' School, Kindergarten and OSHC
	St Margaret's Anglican Girls' School, Pre-prep and OSHC

APPENDIX C: DELEGATIONS OF GOVERNING BODY

This list of delegations is reflective of all Schools and Services governed by the ACSQ (refer to section 10.9 and Appendix B). ACSQ has a number of roles relating to child safety that it can delegate to specific persons/entities. Please see below a list of ACSQ's relevant delegations.

The governing body of each Separately Incorporated Anglican School and Service will need to review this appendix and amend as appropriate to their circumstances, ensuring their own version is published alongside this Policy (refer to section 3 of this Policy).

1. REPORTING OF SEXUAL ABUSE OR LIKELY SEXUAL ABUSE TO POLICE

ACSQ DELEGATE: EXECUTIVE DIRECTOR, ASC

Note: this reflects the delegation, made by unanimous resolutions, by the Directors of the governing body, pursuant to section 366B of the *Education (General Provisions) Act 2006*.

Reference: Section 10.9 (c) of the Policy.

Receiving a report of a reasonable suspicion of sexual abuse or likely sexual abuse to a child, or other person that otherwise meets the definition of a student; or a reasonable belief of a child sexual offence committed by an adult, that is not known to have been reported to the Police:

- a) provide this report to the Police immediately; and
- b) inform, in writing, any person who provided this report as part of their responsibilities detailed in this Policy, that the matter has been reported to the Police.

2. REPORTING TO THE REGULATORY AUTHORITY FOR EDUCATION AND CARE SERVICES

ACSQ DELEGATES: EXECUTIVE DIRECTOR, ASC AND GENERAL MANAGER ACSQ

Reference: Section 10.9 (d) of the Policy.

Report to the Department of Education, as the regulatory authority, all relevant matters required under Education and Care Services National Law and Regulations.

3. CONCERNS RELATED TO INAPPROPRIATE BEHAVIOUR AND OTHER MATTERS

ACSQ DELEGATES: EXECUTIVE DIRECTOR, ASC AND WHERE A MATTER RELATES TO INFORMATION ABOUT SEXUAL MISCONDUCT, THE DIRECTOR OF PROFESSIONAL STANDARDS.

Reference: Section 10.9 (e, f, g) of the Policy.

The Executive Director of the ASC is the delegate to receive reports regarding:

- i. alleged inappropriate behaviour by past or current staff members or volunteers
- ii. additional matters potentially significant impact on the strategic operation of the School or Service

and will ensure concerns related to inappropriate behaviour are managed as per this Policy and applicable law or canon.

Where a matter relates to information about sexual misconduct by a past or current staff member or volunteer, both the Executive Director, ASC and the Director of Professional Standards, ACSQ are the delegates tasked with meeting responsibilities in section 8.10.5 of the Policy. If the information does not relate to sexual misconduct, the Director of Professional Standards has no role.

The delegates will also provide concerns related to a Licensed Person to the Bishop or Archbishop.

4. ASSURANCE

ACSQ DELEGATES: DIOCESAN COUNCIL, VIA THE EXECUTIVE DIRECTOR, ASC

Reference: Section 10.9 (h and i) of the Policy.

On at least an annual basis, or as requested by the ASC or a regulatory authority, consider issues as reported by the School or Service relevant to:

- a) evidencing effective implementation of this Policy and the Procedures;*
- b) learnings from the application of this Policy and related matters, to the management of the School or Service, including strategic risks.*

Provide direction and authority to the School or Service to participate in quality assurance mechanisms, such as audits, as directed by the ACSQ or a regulatory authority, the purpose of which is to provide assurance of compliance with this Policy.

APPENDIX D: DELEGATION OF STUDENT PROTECTION OFFICERS

Student Protection Officers

[insert name of School/College here]
as at [insert effective date here]

[Insert name of School/College] has adopted the *Protecting Children in Anglican Education Policy, Guidelines and Procedures*, published by the Anglican Schools Commission. As such, where there is a potential, perceived or actual concern:

- i. for a child or young person associated with a School; or
- ii. about the conduct or behaviour of a person who has, or had, an association with children or young people through a School;

children, young people and their families are encouraged; and staff, volunteers and visitors must as soon as practicable, share this information with an Appropriate Person such as a Student Protection Officer. The following staff are appointed as Student Protection Officers for [Insert name of School/College].

AS APPOINTED BY [INSERT Principal name)

Name	Position	Phone number

Signed:

Principal Name

Signature

Date

APPENDIX E: ACKNOWLEDGEMENT

The following acknowledgement can be used by Schools and Services. Alternatively, this acknowledgement may be reflected in other documents such as employment contracts, volunteer agreements or induction/training resources.

ACKNOWLEDGEMENT OF POLICY

Name of staff member or volunteer:

Role/s within School or Education & Care Service:

Name of School or Education & Care Service:

I acknowledge I have read, understood and agree to abide by the *Protecting Children & Young People in Anglican Education Policy*.

I understand this agreement forms part of my employment conditions or volunteer agreement.

Signature of staff member/ volunteer:

Name of staff member/ volunteer:

Date:

Appendix 3

Protecting Children and Young People in Anglican Education - Procedures



Protecting Children and Young People in Anglican Education

Guidelines and Procedures
V1.1

Supporting document for the **Protecting Children
and Young People in Anglican Education Policy**



PROTECTING CHILDREN AND YOUNG PEOPLE IN ANGLICAN EDUCATION GUIDELINES & PROCEDURES

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PROTECTING CHILDREN AND YOUNG PEOPLE IN ANGLICAN EDUCATION GUIDELINES & PROCEDURES

INTRODUCTION

Every **child** and **young person** has the right to be safe. Protecting, caring and supporting children and young people is of paramount importance, and Anglican Schools (Schools) and Education & Care Services (Services) have zero tolerance to **harm**. As such, these *Protecting Children and Young People in Anglican Education Guidelines and Procedures* (these Procedures) assist relevant Schools and Services to operationalise the *Protecting Children and Young People in Anglican Education Policy* (the Policy).

The Policy and these Procedures are to be read in conjunction with one another.

Compliance with these Procedures is mandatory. However, the protection of children and young people requires vigilance and may require decisive action in a range of circumstances. People bound by the Policy and these Procedures are expected to apply their judgement to ensure that the objective of protecting children and young people is achieved in all circumstances. This may, in particular circumstances, require action beyond that or in shorter timeframes than that which is specifically contemplated by these Procedures. Guidance, such as that available from the ASC, will always be available to assist in this regard and should be sought in any situation where required.

Protecting Children and Young People in Anglican Education Policy

Section 16 *Education (Accreditation of Non-State Schools) Regulations 2017*: Conduct of staff and students and response to harm.

APPROVAL, FEEDBACK AND REVIEW

These Procedures are approved and maintained by the Anglican Schools Commission (ASC), Anglican Church Southern Queensland (ACSQ).

Feedback on the Policy and these Procedures is welcome and can be provided to Principals (in Schools) and Nominated Supervisors (in Services) for provision to the ASC. The ASC can also be contacted directly through asc@anglicanchurchsq.org.au.

These Procedures, alongside the Policy, will be formally reviewed in three years, when underlying legislation changes, or as required on request of either Diocesan Council or the ASC. The ASC will monitor these Procedures for continuing application, commencing a formal review process earlier if needed. In addition to this, whenever required to maintain accuracy, the ASC will make changes to these Procedures.

Changes to these Procedures will be explained in section 20 of this document: Version Control, and communicated to Schools and Services for their local implementation.

PROTECTING CHILDREN AND YOUNG PEOPLE IN ANGLICAN EDUCATION GUIDELINES & PROCEDURES

STRUCTURE

Within these Procedures:

- Key terms are defined in Appendix 1.
- Key legal or canonical obligations are shown in purple boxes. Also refer to Appendix 2 for a summary of notable requirements and how they are reflected within the Policy.
- Further resources are identified in yellow boxes.

These Procedures have five sections:

- Part A: Processes for Responding
- Part B: Key considerations when Responding
- Part C: Preparing to Respond
- Part D: Assurance Activities
- Part E: Appendices:
 - 1: Key Terms and Definitions
 - 2: Law and Canon

COMPLAINTS

Written complaints' procedures, to address allegations of non-compliance with these Procedures or the Policy, are detailed in the complaints management policies and procedures published by the ASC. This process applies to all Anglican Schools and Services in the Brisbane Diocese.

In addition to this, relevant persons may also consider the application of the whistleblower policy and procedures, published by the ASC or, for separately incorporated schools or services, their own such processes.

Persons who are found to have made a vexatious complaint or who have made a complaint other than in good faith, may face disciplinary action by the relevant School or Service, or the ASC.

BREACHES

A breach of these Procedures or the Policy may result from:

- (a) a disciplinary matter for the ASC or the relevant School or Service (which may result in performance management, formal warning, suspension, demotion, or termination in accordance with industrial processes or, in the case of a Licensed person, disciplinary action by the Anglican Church of Australia or a related entity);
- (b) a contractual matter (breach or repudiation);
- (c) professional misconduct referred to relevant authorities;
- (d) a breach of statute referred to relevant authorities;
- (e) a criminal matter referred to relevant authorities; or
- (f) a civil matter referred for legal advice and remedy.

PROTECTING CHILDREN AND YOUNG PEOPLE IN ANGLICAN EDUCATION GUIDELINES & PROCEDURES

Schools, Services and the ASC retain discretion regarding how to respond to breaches of these Procedures or the Policy, but will refer to underlying legislation in relation to responding to breaches of Procedure or Policy.

A potential or actual breach of these Procedures or the Policy may expose Schools, Services and the ASC/ACSQ to significant damage to the trust afforded to it and to public scrutiny. These factors will be taken into account when considering the scope of any allegations of breaches of these Procedures or the Policy, and any disciplinary action that may be taken as a result.

PROTECTING CHILDREN AND YOUNG PEOPLE IN ANGLICAN EDUCATION GUIDELINES & PROCEDURES

PART A: PROCESSES FOR RESPONDING

1. RAISING CONCERNS

A concern is *information of whatever nature and from whatever source that leads to a reasonable suspicion of circumstances that may have posed, or continues to pose, a risk to the physical or psychological safety of a child or young person*. This includes, but may not be limited to:

- incidents or allegations of sexual, physical, other abuse or inappropriate behaviour;
- matters that are recent or historical in nature.

Children, young people and their families are *encouraged*, and staff, volunteers and visitors *must*, as soon as practicable, discuss concerns:

- for a child or young person associated with a School or Service; or
- about the conduct or behaviour of another person who has, or had, an association with children or young people through a School or Service,

with an Appropriate Person associated with the School or Service, as detailed in the following table.

If unsure about whether to share the information, then the information is to be shared.

<i>Person with concern</i>	<i>Appropriate Persons to share information with</i>
<i>Children and young people</i>	<p>Children and young people are asked to raise any concerns (impacting either themselves and/or their peers) with <u>an adult they trust</u>, so that the adult can help.</p> <p>Student Protection Officers (in Schools) and Responsible Persons and Nominated Supervisors (in Services) are particularly available to help.</p> <p>Without minimising the responsibility of adults to respond to the care and protective needs of children and young people, it is also recognised that friendship and support from peers is important to help children and young people feel safe and less isolated.</p>
<i>Visitors, including parents and carers</i>	<p>a) In Schools: A Student Protection Officer or person with Appropriate Authority</p> <p>b) In Services: A person with Appropriate Authority</p>
<i>Volunteers and staff</i> <i>(staff are also to refer to relevant sections below regarding statutory reporting obligations)</i>	<p>a) In Schools: A Student Protection Officer or the Principal</p> <p>b) In Services: A Nominated Supervisor or the Approved Provider</p> <p>Where required to guide the application of the Policy, volunteers and staff are also able to share information with staff from:</p> <p>a) The Anglican Schools Commission</p> <p>b) The Office of the Director of Professional Standards (regarding sexual misconduct)</p>

PROTECTING CHILDREN AND YOUNG PEOPLE IN ANGLICAN EDUCATION GUIDELINES & PROCEDURES

2. STATUTORY REPORTING

2.1 KEY DEFINITIONS

IN NEED OF PROTECTION: As defined in section 10 of the *Child Protection Act 1999*, *a child in need of protection is a child who:*

- a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and*
- b) does not have a parent able and willing to protect the child from the harm.*

HARM: As defined in section 9 of the *Child Protection Act 1999*, *harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.* It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. Harm can be caused by a single act, omission or circumstance; or a series or combination of acts, omissions or circumstances.

REASONABLE SUSPICION: Means to suspect on grounds that are reasonable in the circumstances.
Note:

- *This requires the application of judgement.*
- *The threshold for reporting 'reasonable suspicion', is less than needing to believe something is true or know something for certain. Conversely, to reasonably suspect something is more than something being remotely possible.*

REPORTABLE SUSPICION: Reportable suspicion about a child, is a reasonable suspicion that the child has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse, and may not have a parent able and willing to protect the child from the harm.

SEXUAL ABUSE: Defined in section 364 of the *Education (General Provisions) Act 2006* as including sexual behaviour involving the student and another person, where:

- a) the other person bribes, coerces, exploits, threatens or is violent toward the student; or
- b) the student has less power than the other person; or
- c) there is a significant disparity between the student and the other person in intellectual capacity or maturity.

PROTECTING CHILDREN AND YOUNG PEOPLE IN ANGLICAN EDUCATION GUIDELINES & PROCEDURES

2.2 REPORTING TO CHILD SAFETY

NOTE: THE POLICY AND THESE PROCEDURES ARE NOT INTENDED TO LIMIT ANY PERSON'S ABILITY TO REPORT TO CHILD SAFETY.

- [Online reporting form for Child Safety](#)
- [Protection Form](#)
- [Key Contacts](#)
- [Child Protection Guide \(CPG\)](#)
- [Supporting information regarding the CPG](#)
- [Additional information](#)

Sections 13 A and E of the *Child Protection Act 1999*.

2.2.1 PROCESS FOR REPORTING TO CHILD SAFETY - MANDATORY REPORTING AND ACTION TO BE TAKEN

Sections 13E and 13G of the *Child Protection Act 1999* and section 10 of the *Regulations 2011*.

The following relevant persons are to make a written report to Child Safety when, during the course of the person's engagement as a relevant person, they form a reportable suspicion that a child is in need of protection due to physical or sexual abuse:

- a) Teachers;
- b) Registered nurses and doctors;
- c) Education and care professionals.

Notes:

- A report is not required if the person knows a report has already been made.
- If unsure about whether a report is to be made, then make the report.

This report must include information known about:

- a) the basis on which the person has formed the reportable suspicion;
- b) the child's name, sex and age;
- c) details of how to contact the child (e.g. the address at which the child usually lives; or the name and address of the school the child attends);
- d) details of the harm to which the reportable suspicion relates;
- e) particulars of the identity of the person suspected of causing the child to have suffered, suffer, or be at risk of suffering, the harm to which the reportable suspicion relates; and
- f) particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates.

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To make this report:

Mandatory reporter	<p>If a mandatory reporter has, based on information available, a reasonable suspicion that a child is in need of protection from physical or sexual abuse, the following actions are required:</p> <ol style="list-style-type: none"> if there is an immediate danger, call '000' (section 9) discuss concerns with: <ul style="list-style-type: none"> an SPO or the Principal (Schools); a Nominated Supervisor or Approved Provider (Services) consider any additional information available to inform the decision and content of the report (section 7) if the matter relates to sexual abuse or likely sexual abuse towards a child, immediately refer to section 2.3 to meet obligations relevant to the matter being reported to the Police where it is reasonable to suspect a child is in need of protection from physical or sexual abuse, report to Child Safety using Child Safety's online reporting form, or, when there are multiple notifiers of the same matter within the School or Service, sign a copy of the report made provide a copy of the Child Safety report to an SPO or the Principal (Schools), or Nominated Supervisor or Approved Provider (Services) refer to other sections of these Procedures for further information and required actions
Schools: SPO or the Principal Services: Nominated Supervisor or Approved Provider	<p>Appropriate persons from Schools and Services are required to:</p> <ol style="list-style-type: none"> engage with the mandatory reporter to: <ul style="list-style-type: none"> provide support and assistance in meeting their responsibilities gather and share relevant information available (section 7) to inform mandatory reporter's reporting decision consider the use of additional supports to guide decision making and management of the matter, such as the ASC Child Safety Advocate and the Child Protection Guide consider the need to support a timely response by contacting Child Safety by telephone (Key contacts) ensure a written report is made to Child Safety (using Child Safety's online reporting form) ensure that all persons who have contributed concerns to the report are recorded as 'notifiers' (only one report is required per incident or matter) ensure all staff who have contributed concerns are informed of, and all mandatory reporters have the opportunity to sign, the report made to Child Safety complete the internal Protection Form ensure all actions taken and decisions made are appropriately documented ensure copies of both the report to Child Safety and the Protection Form, and any other relevant records, are retained appropriately by the School or Service (section 11) ensure information about the report is included in required reporting on Policy implementation (sections 14 and 19) refer to other sections of these Procedures for further information and required actions

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2.2.2 PROCESS FOR REPORTING TO CHILD SAFETY AND ACTION TO BE TAKEN

Sections 13A of the *Child Protection Act 1999*

Schools and Services are committed to reporting to Child Safety whenever it is reasonable to suspect a child is in need of protection, regardless of the type of abuse or neglect. Child Safety is the appropriate statutory authority for assessing, investigating and intervening in these circumstances. As such, and in accordance with the Policy, in addition to the mandatory reporting discussed above, the following process is to be followed by all staff and volunteers:

<p>Staff and volunteers, including those with Appropriate Authority</p> <p>(Note: mandatory reporters are to refer to section 2.2.1 if the matter relates to physical or sexual abuse)</p>	<p>If staff and volunteers have concerns that may relate to a reasonable suspicion a child is in need of protection, regardless of the type of abuse or neglect, the following actions are required:</p> <ol style="list-style-type: none"> if there is an immediate danger, call '000', refer (section 9) discuss concerns with: <ul style="list-style-type: none"> an SPO or the Principal (Schools) a Nominated Supervisor or Approved Provider (Services) if the matter relates to sexual abuse or likely sexual abuse, immediately refer to section 2.3 to meet obligations relevant to the matter being reported to the Police
<p>Schools: SPO or the Principal</p> <p>Services: Nominated Supervisor or Approved Provider</p>	<p>Appropriate persons from Schools and Services are required to:</p> <ol style="list-style-type: none"> engage with the staff member or volunteer to <ul style="list-style-type: none"> provide support and assistance in meeting their responsibilities gather and share relevant information available (section 7) consider the use of additional supports to guide decision making and management of the matter, such as the ASC Child Safety Advocate and the Child Protection Guide where it is reasonable to suspect a child is in need of protection that is not related to physical or sexual abuse, report the matter to Child Safety, either by: <ul style="list-style-type: none"> telephoning the Regional Intake Service (Key contacts) making a written report to Child Safety, using Child Safety's online reporting form <p>Note: where the matter relates to physical or sexual abuse, it is a reportable suspicion that <u>must</u> be made in writing (section 2.2.1)</p> if the matter is reported to Child Safety: <ul style="list-style-type: none"> ensure that all persons who have contributed concerns to the report are recorded as 'notifiers' (note only one report is required per incident or matter) inform all staff who contributed concerns to the report that the matter has been reported to Child Safety complete the internal Protection Form ensure all actions taken and decisions made are appropriately documented

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	<p>g) ensure copies of both the report to Child Safety (if completed) and the Protection Form, and any other records, are retained appropriately by the School or Service (section 11)</p> <p>h) ensure information about the report is included in required reporting on Policy implementation (sections 14 and 19)</p> <p>i) refer to other sections of these Procedures for further information and required actions</p>
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2.3 REPORTING SEXUAL ABUSE OR LIKELY SEXUAL ABUSE

- [Protection Form](#)
- [Key Contacts](#)

Sections 364, 366 and 366 A and B of the *Education (General Provisions) Act 2006* and sections 68 and 69 of the *Regulations 2017*.

Professional Standards Canon and the ACSQ Protocol for Responding to Child Sexual Abuse and Sexual Misconduct.

Staff members are required to immediately provide a written report when they become aware, or reasonably suspect, in the course of their employment at the School or Service, that a child, young person or student has been, or is likely to be, sexually abused by another person.

Defined in section 364 of the *Education (General Provisions) Act 2006* as including **sexual behaviour involving the student and another person, where:**

- The other person bribes, coerces, exploits, threatens or is violent toward the student; or**
- The student has less power than the other person; or**
- There is a significant disparity between the student and the other person in intellectual capacity or maturity.**

Sexual abuse may include a sexual offence committed against, with or in the presence of a child, including:

- sexual assault
- indecent acts
- production or possession of child abuse material
- 'grooming' a child in order to commit a sexual offence. Grooming concerns predatory conduct undertaken to prepare a child for sexual activity at a later time.

Note: for the purpose of the Policy and these Procedure, requirements related to students apply to any child or young person associated with the School or Service or where the concern is obtained through a person's engagement with a School or Service however, see section 2.3.1 - Frequently Asked Questions - for information on students over 18 years old.

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This written report is to be provided:

- a) for Schools: to the Principal; or
- b) for Services co-located with a School: to both a Nominated Supervisor and the Principal; or
- c) for other Services: to the Nominated Supervisor; or
- d) where the concerns relate to the Principal: to a Director of the School's governing body, or their delegate;
- e) where concerns relate to the Nominated Supervisor: to the Approval Provider, or their delegate.

This report must include:

- a) the name of the person giving the report (the first person);
- b) the child or young person's name and sex;
- c) details of the basis for the first person becoming aware, or reasonably suspecting, that the child or young person has been sexually abused, or is likely to be sexually abused, by another person;
- d) details of the abuse or suspected abuse;
- e) any of the following information of which the first person is aware:
 - i. the child or young person's age;
 - ii. the identity of the person who has sexually abused, or is suspected to have sexually abused, the child or young person;
 - iii. the identity of anyone else who may have information about the abuse or suspected abuse.

2.3.1 FREQUENTLY ASKED QUESTIONS

What is the relationship between sexual abuse, sexual exploitation, sexual assault and other child sex offences? Sexual abuse has a broader definition than sexual exploitation, sexual assault and other child sex offences. Both sexual exploitation and assault would generally meet the definition of sexual abuse, as would many child sex offences, as they commonly relate to sexual behaviour where there is: coercion, threats or violence; a lack of consent; or disparity in power, intellectual capacity or maturity.

What if the student is over 18 years old? If a person reasonably believes the student is over 18 years old and does not want to reveal the information to police, then a report to the police is not required unless the student is a person with a disability who is being provided with special education at the School. Consider what information is available or is reasonable to gather, to inform this decision and record the matter in sufficient detail.

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Am I required to report directly to Police? Where the concern identified by an adult student, visitor, volunteer or staff member causes the person to believe on reasonable grounds that a child sexual offence is being or has been committed against a child by another adult, the person who has identified the concern is required to disclose the concern to the Police. However, a report to Police may not be required in certain circumstances, including where the person who identified the concern believes on reasonable grounds that the concern has already been disclosed to the Police. *It is therefore appropriate for the Principal (School), Nominated Supervisor (Service), or another delegate of the governing body to inform the person when their concern has been reported to Police.*

2.3.2 PROCESS FOR REPORTING SEXUAL ABUSE AND LIKELY SEXUAL ABUSE, AND ACTION TO BE TAKEN

Staff and volunteers, including those with Appropriate Authority	<p>If a staff member or volunteer develops, or are informed of, concerns that may relate to a reasonable suspicion a child, young person or student has been or is likely to be sexually abused, the following actions are required:</p> <ol style="list-style-type: none"> if there is an immediate danger, call '000' (section 9) discuss concerns with: <ol style="list-style-type: none"> an SPO or the Principal (Schools) a Nominated Supervisor or Approved Provider (Services) consider any additional information available to inform the decision and content of the report (section 7) if it's reasonable to suspect a child, young person or student has been or is likely to be sexually abused, immediately commence a Protection Form (a written report) and provide to: <ol style="list-style-type: none"> the Principal (Schools)¹ a Nominated Supervisor² or Approved Provider (Services) <p>It is the responsibility of the Principal or Nominated Supervisor to then immediately report the matter to Police.</p> if the matter relates to a child who may be in need of protection, refer to section 2.2 regarding obligations relevant to the matter being reported to Child Safety. refer to other sections of these Procedures for further information and required actions
Schools: SPO or the Principal Services: Nominated Supervisor	<p>Assistance</p> <p>Appropriate Persons from the School or Service are required to:</p> <ol style="list-style-type: none"> engage with the staff member or volunteer to <ul style="list-style-type: none"> provide support and assistance in meeting their responsibilities gather and share relevant information available (section 7) consider the use of additional supports to guide decision making and management of the matter, such as the ASC Child Safety Advocate

¹ If concerns relate to the Principal, the Protection Form is to be provided directly to the delegate of the School's governing body for their management. Refer to appendix C of the Policy.

² If concerns relate to the Nominated Supervisor, the Protection Form is to be provided directly to the Approved Provider (or delegate) for their management. Refer to appendix C of the Policy.

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	<p>Responsibilities</p> <p>For Principals and Nominated Supervisors:</p> <ol style="list-style-type: none">if it's reasonable to suspect a child, young person or student has been or is likely to be sexually abused, immediately provide the Protection Form to the Police as a written report (Key Contacts)if it's reasonable to suspect a response is required that day, contact Police by telephone (Key Contacts)where the concern is identified by an adult student, visitor, volunteer or staff member, inform the person when their concern has been reported to Policeif the matter involves a teacher, follow the process outlined in section 2.5 of these Proceduresensure all actions taken and decisions made are appropriately documentedensure a copy of the Protection Form, and any other records, are retained appropriately by the School or Service (section 7)if the concern was identified by the Principal, immediately provide a copy of the Protection Form to the delegate of the School's governing body (Appendix C of the Policy).ensure information about the report is included in required reporting on Policy implementation (sections 14 and 19)refer to other sections of these Procedures for further information and required actions
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2.4 EDUCATION AND CARE SERVICE REPORTING TO THE DEPARTMENT OF EDUCATION

- [Protection Form](#)
- [ACECQA Reporting Requirements About Children](#)

Education and Care Service National Law 2018 and Regulations 2021

A report is required to be made to the Regulatory Authority (Department of Education) where required in the *Education and Care Services National Law and Regulations*. There are strict timeframes in relation to when prescribed reports are required to be made to the Department of Education. Notifications specific to child safety are set out below.

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2.4.1 SUMMARY OF MATTERS TO BE REPORTED TO THE DEPARTMENT OF EDUCATION

Matter	Timeframe for Approved Provider (or delegate) to complete report to Regulator
<p>Receiving a complaint alleging that Education and Care Service Law has been contravened</p> <ul style="list-style-type: none"> Note any communication that could possibly be perceived as a complaint should be considered Examples include, but are not limited to, not taking reasonable precaution to protect children from harm or hazard, use of inappropriate discipline or insufficient supervision 	Within 24 hours of the complaint
Any circumstance arising at the service that poses a risk to the health, safety or wellbeing of a child attending the Service	Within 7 days
Any incident where it is reasonable for the Approved Provider to believe that physical abuse or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the Service (note this is often reportable under another 24-hour category)	Within 7 days
Allegations that physical abuse or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the Service (note this is often reportable under another 24-hour category)	Within 7 days
<p>All suspected, actual or alleged serious incidents. A Serious Incident includes:</p> <ul style="list-style-type: none"> the death of a child while being cared for by an Education and Care Service (ECS), or following an incident at the ECS any incident involving serious injury or trauma to a child where it could be reasonably expected the children required urgent medical attention from a registered medical practitioner, or attend a hospital (e.g. broken limb); any incident involving serious illness, where a child ought reasonably to have attended a hospital (e.g. anaphylaxis) any emergency for which emergency services attended; any circumstance where a child <ul style="list-style-type: none"> appears to be missing or cannot be accounted for; or appears to have been taken or removed from the premises in a manner that contravenes Regulations; or is mistakenly locked in or locked out of the premises or any part of the premises 	<p>Within 24 hours of the incident</p> <p>In the case of a death of a child, as soon as practicable but within 24 hours</p>
<p>Whenever the service receives a notification regarding a Nominated Supervisor and:</p> <ul style="list-style-type: none"> the suspension or cancellation of a working with children card or teacher registration, or disciplinary proceedings under an education law 	Within 7 days

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2.4.2 PROCESS FOR REPORTING TO THE DEPARTMENT OF EDUCATION AND ACTION TO BE TAKEN

Staff and volunteers	<p>If a matter is reportable (section 2.4.1), staff and volunteers are required to ensure the matter has been reported to a Responsible Person or the Nominated Supervisor as soon as practicable (usually immediately).</p> <p>Staff and volunteers are required to ensure they understand what local processes are in place in the Service to make these reports. They should be both verbally (for timeliness) and, for staff at least, in writing (to evidence that the Responsible Person or Nominated Supervisor was advised).</p>
Responsible Person and Nominated Supervisor	<p>Assistance</p> <ol style="list-style-type: none"> engage with the staff member or volunteer to <ul style="list-style-type: none"> provide support and assistance in meeting their responsibilities gather and share relevant information available (section 7) consider the use of additional supports to guide decision making and management of the matter, such as the ASC's ECS support staff or Child Safety Advocate <p>Responsibilities</p> <p>For Responsible Persons:</p> <ol style="list-style-type: none"> ensure the matter is, as soon as practicable (usually immediately), reported to the Nominated Supervisor or, if the Nominated Supervisor is unavailable, the delegate of the Approved Provider (Appendix C of the Policy) provide assistance, as necessary, to the Nominated Supervisor and the Approved Provider's delegate. <p>For Nominated Supervisors:</p> <ol style="list-style-type: none"> consider the use of additional supports to guide decision making and management of the matter, such as the ASC's ECS supports or the Child Safety Advocate complete the Protection Form and provide this to the delegate of the Approved Provider (see Appendix C of the Policy) provide assistance, as necessary, to the Approved Provider's delegate and the Department of Education ensure copies of the Protection Form and any other records, are retained appropriately by the Service (section 11) ensure information about the report is included in required reporting on Policy implementation (sections 14 and 19) refer to other sections of these Procedures for further information and required actions.
Approved Provider/ Delegate	<p>Approved Providers/Delegates are required to:</p> <ol style="list-style-type: none"> use information in the Protection Form to report to the Department of Education, in compliance with the notification timeframes provide assistance, as necessary, to the Department of Education refer to other sections of these Procedures for further information and required actions.

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2.5 PROCESS FOR REPORTING TO THE QUEENSLAND COLLEGE OF TEACHERS (QCT)

- [Queensland College of Teachers: Notifications](#)
- [Queensland College of Teachers: Complaints](#)

Sections 76 to 78 of the *Education (Queensland College of Teachers) Act 2005*

Principals (as employing authority)	<p>As part of responding to concerns related to an Approved Teacher, Principals are required to:</p> <p>a) manage the matter as per section 3 of these Procedures;</p> <p>b) report to QCT:</p> <ul style="list-style-type: none">• As soon as practicable after starting to deal with an allegation of harm caused or likely to be caused to a child because of the conduct of a relevant teacher. Dealing with an allegation of harm includes if the employing authority takes action in relation to the allegation, including investigating, inquiring into, or examining the allegation or referring the allegation to another entity to deal with• As soon as practicable after the employing authority stops dealing with the allegation for any reason, notify the outcome of the employing authority's dealing with the allegations• Within 14 days of a notice of dismissal, notify dismissals of a relevant teacher where circumstances call into question the teacher's competency to be employed as a teacher <p>c) provide assistance, as necessary, to QCT.</p>
Nominated Supervisor	<p>As part of responding to concerns related to an Approved Teacher where the relevant teacher is employed in a Service (and not a School where above applies), a Nominated Supervisor is required to notify QCT if the teacher is dismissed in circumstances that call into question their competency to be employed as a teacher.</p>

2.6 REPORTING TO THE AUSTRALIAN HEALTH PRACTITIONER REGULATION AGENCY (AHPRA)

- [Australian Health Professional Regulation Agency: Concerns](#)
- [Australian Health Professional Regulation Agency: Mandatory Notifications](#)

Principals and Nominated Supervisors	<p>a) As part of responding to concerns related to a person who is registered with Ahpra report to Ahpra where appropriate or required</p> <p>b) Provide assistance, as necessary, to Ahpra</p>
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2.7 ADDITIONAL REPORTING TO POLICE

When responding to concerns, in addition to contacting '000' in response to an emergency or reporting to Police as per section 2.3 of these Procedures, it may be appropriate to report other matters, e.g. when the reporting is necessary to reduce a risk of harm.

- Queensland Police Service: <https://www.police.qld.gov.au/>
- [Key Contacts](#)

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3. PROCESSES WHEN A CONCERN RELATES TO THE BEHAVIOUR OF A STAFF MEMBER OR VOLUNTEER

This section applies where concerns relate to the behaviour or alleged behaviour of a person who has a role in, or (direct or indirect) contact with children and young people, through an Anglican School or Service.

‘Concern’ is defined in Appendix 1 of these Procedures.

The violation of behavioural expectations and professional boundaries, irrespective of the person’s intent, represents a breach of trust, a failure to meet a duty of care requirement to children and young people, and a failure to follow conduct requirements of their employer. When staff violate boundaries, they can risk:

- serious or harmful consequences for the child or young person
- seriously undermining the learning process
- seriously undermining their professional reputation and the confidence of the School or Service
- formal directions or other disciplinary action from their employer or regulating authority
- termination of employment
- criminal charges.

It is the responsibility of adults to take action and promote a safe environment for children and young people. People often feel uncomfortable challenging boundary transgressions of others, especially adults. While raising a potential issue about another staff member or volunteer, especially a person perceived to be in a higher position of power, can feel very difficult, being able to do so is of utmost importance to the safety and wellbeing of children and young people. It is therefore an expectation that people will ‘call out’ behaviour that may be inconsistent with requirements or not in the best interests of children or young people.

3.1 ACTIONS REQUIRED

Where a person raises a concern about the behaviour of a staff member or volunteer (current or historical), the following actions are required:

Volunteer or staff member, including Appropriate Authority

If a volunteer or staff member develops or receives a concern they will, as soon as practicable (usually immediately), report the matter to:

- a) Schools: a Student Protection Officer (SPO) or the Principal
- b) Services: a Nominated Supervisors or the Approved Provider

This should be both verbally (for timeliness) and in writing (to evidence that appropriate persons were advised). Staff are to commence a [Protection Form](#).

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<p>Schools: SPO or the Principal</p> <p>Services: Nominated Supervisor or Approved Provider</p>	<p>Appropriate persons from Schools and Services are required to:</p> <p>Assistance</p> <ol style="list-style-type: none"> engage with the staff member or volunteer to: <ul style="list-style-type: none"> provide support and assistance in meeting their responsibilities gather and share relevant information available (section 7) consider the use of additional supports to guide decision making and management of the matter, such as the ASC's Child Safety Advocate and legal advice on receiving these concerns, ensure a Protection Form is commenced SPOs will, as soon as practicable (usually immediately), bring the concerns to the attention of the Principal and provide a copy of the commenced Protection Form. If the concerns relate to the Principal or the Nominated Supervisor, then concerns are to be reported directly to the governing body's delegate (see Appendix C of the Policy), who will meet any responsibilities otherwise delegated to that Principal or Nominated Supervisor regarding the management of the matter. <p>Responsibilities for Principals and Nominated Supervisors</p> <p>Principals and Nominated Supervisors are required to:</p> <ol style="list-style-type: none"> as soon as practicable, report all concerns to the governing body's delegate (Appendix C of the Policy) adhere to all applicable statutory reporting requirements (section 2) work with governing body's delegate to plan an appropriate response that demonstrates integrity, using a process that would stand up to external scrutiny. An investigation may be commenced where there is a reasonable suspicion that the staff member or volunteer's behaviour has caused or is likely to cause harm to a child or young person and if it is appropriate in the circumstances (for example, the commencement of an investigation may not be appropriate in circumstances where it is being investigated by regulatory authorities, including the Police). <u>This includes concerns regarding grooming behaviour</u>. Investigations may be conducted by a third party, e.g. a law firm or external investigator. Consideration will be given to all relevant obligations, such as statutory and canonical reporting; employment law; work, health and safety responsibilities; or other actions that assist in reducing the likelihood of harm to children and young people ensure all actions taken and decisions made are appropriately documented ensure a copy of the Protection Form, and any other records, are retained appropriately by the School or Service (section 11) ensure information about the report is included in required reporting on Policy implementation (sections 14 and 19) refer to other sections of these Procedures for further information and required actions
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Governing body's delegate

The governing body's delegate is required to:

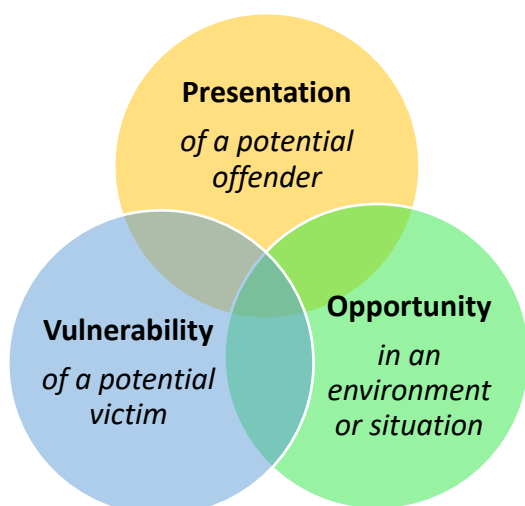
- a) if concerns relate to a Licensed Person, report the concerns to the Bishop or Archbishop
- b) work with the Principal or Nominated Supervisor to respond appropriately to the concerns and meet relevant responsibilities.

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PART B: KEY CONSIDERATIONS WHEN RESPONDING

4. IDENTIFYING ABUSE

Abuse occurs when the following three criteria connect:



It can be very hard for children and young people to speak out about abuse. Often, they fear there may be negative consequences if they tell anyone what's happening to them. Some may delay telling someone about abuse for a long time, while others never tell anyone, even if they want to. *It's vital that children and young people are informed and feel safe enough to raise any worries or concerns, that they can speak out and that whoever they tell takes them seriously and takes appropriate action regarding what they've been told.*

Even if a child or young person doesn't tell someone verbally about what's happened to them,

there may be other indicators that something is wrong. *People who work with children need to be able to recognise the signs and know how to respond appropriately.*

Abuse happens when a person harms a child. It can be physical, sexual or emotional, and can involve neglect. *Children and young people could be abused by anyone.* Children and young people who have been abused may want to tell someone, but not have the exact words to do so. They may attempt to disclose abuse by giving adults clues, through their actions and by using indirect words.

Waiting for a child to be ready to speak about their experiences could mean that the abuse carries on and they, or another child, are put at further risk of significant harm. Not taking appropriate action quickly can also affect the child's mental health. This may discourage them from seeking help in the future and make them distrust adults. *Raising concerns does not require a direct disclosure.*

4.1 SIGNS OF ABUSE

Children and young people experiencing abuse often experience more than one type of abuse over a period of time and may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion. Many of the signs of abuse are the same regardless of the type of abuse. *Anyone working with children or young people need to be able to recognise the signs.* These include but are not limited to the following:

- being afraid of particular places or making excuses to avoid particular people
- knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/or sexual behaviour
- having angry outbursts or behaving aggressively towards others
- becoming withdrawn or appearing anxious, clingy or depressed

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- self-harming or having thoughts about suicide
- showing changes in eating habits or developing eating disorders
- regularly experiencing nightmares or sleep problems
- regularly wetting the bed or soiling their clothes
- running away or regularly going missing from home or care
- not receiving adequate medical attention after injuries

Also refer to the Child Development and Trauma Guide

<https://www.dcp.wa.gov.au/ChildProtection/ChildAbuseAndNeglect/Documents/ChildDevelopmentAndTraumaGuide.pdf>

These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents – *however they are enough to raise concerns with an appropriate person at the School or Service.*

4.2 UNHEALTHY RELATIONSHIPS

Abuse usually occurs in the context of an unhealthy relationship. Being in an unhealthy relationship negatively affects a person's wellbeing and places them at risk of harm.

Children and young people may not always understand that a relationship is unhealthy. If they have been groomed for example, they may believe they are in a healthy relationship. If they are in an unhealthy or abusive family relationship, they may never have known any different. This means children and young people may not always speak out about unhealthy relationships.

If a person is worried:

- *about a child or young person's relationship with another person, or*
- *another person's behaviour is encouraging an unhealthy relationship to develop*

it is important to raise concerns with an appropriate person at the School or Service.

5. MANAGING DISCLOSURES

Practitioner Resource: Responding to children and young people's disclosures of abuse

<https://aifs.gov.au/cfca/publications/responding-children-and-young-people-s-disclosures-abu>

Responding to a child's disclosure of abuse (video)

<https://youtu.be/bvJ5uBlGYgE>

Disclosure is the process by which children and young people start to share their experiences of abuse with others. This can take place over a long period of time. Children may disclose directly or

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indirectly and sometimes they may start sharing details of abuse before they are ready to put their thoughts and feelings in order.

Where a disclosure is made, or a person has a reasonable suspicion that a child is being subjected to abuse or harm, the steps and processes outlined in section 2 must be followed. *All disclosures should be taken seriously. It takes extraordinary courage for a child to go through the journey of disclosing abuse and it's vital that anyone who works with children and young people undertaking this journey, is able to provide them with the support they need.*

Children and young people may disclose abuse in a variety of ways, including:

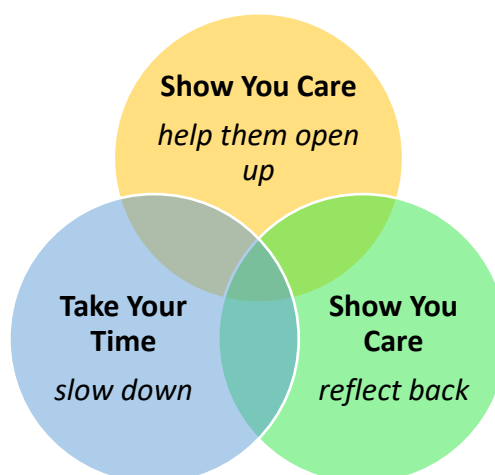
- Directly: making specific verbal statements about what's happened to them
- Indirectly: making ambiguous verbal statements which suggest something is wrong
- Behaviourally: displaying behaviour that signals something is wrong
- Non-verbally: writing letters, drawing pictures or trying to communicate in other ways.

Children and young people may not always be aware that they are disclosing abuse through their actions and behaviour. Sometimes children and young people make partial disclosures of abuse. This means they give some details about what they've experienced, but not the whole picture. They may withhold some information because they:

- are afraid they will get in trouble with or upset their family
- want to deflect blame in case of family difficulties as a result of the disclosure
- feel ashamed and/or guilty
- need to protect themselves from having to relive traumatic events.

Research about how adults can better respond to a child who is disclosing abuse found three key interpersonal skills that help a child feel they are being listened to and taken seriously:

1. *Show you care*, help them open up: Give your full attention to the child or young person and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases such as 'you've shown such courage today' help.
2. *Take your time*, slow down: Respect pauses and don't interrupt the child – let them go at their own pace. Recognise and respond to their body language. Remember that it may take several conversations for them to share what's happened to them.
3. *Show you understand*, reflect back: Make it clear you're interested in what the child is telling you. Ask 'tell me more about that'. Reflect back what they've said to check your understanding – and use their language to show it's their experience.



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If a child tells you they are experiencing abuse, *it's important to reassure them that they've done the right thing in telling you. Make sure they know that abuse is never their fault.*

The people the child chooses to disclose to, need to listen, understand and respond appropriately so the child gets the help, support and protection they need.

5.1 NON-BIASED APPROACH

It's vital that any child who is trying to disclose abuse feels that they are being listened to and taken seriously. There can be a risk that, if professionals react inappropriately, this can lead to unfair bias against the child or young person, or the alleged abuser as formal investigations progress. *This means it's important to maintain an unbiased approach when responding to disclosures and follow the Policy and these Procedures to ensure each case is treated in a fair and transparent manner and that the child gets the protection and support that they need.*

This also means that any person who has a role in the management of the matter, needs to declare identified, actual or perceived, conflicts of interest, so as wherever possible, decisions are not made, or the management of matters are not influenced by, the person with that conflict.

5.2 PEER SUPPORT

For children and young people, friendship and support from peers is important to help children and young people feel safe and less isolated. Important considerations for Schools and Services regarding peer support include:

- Providing clear communication and support to children and young people about their ability to talk with an appropriate adult if they are concerned for either their, or another child or young person's, safety. This includes their role as bystanders or witness to behaviours of concern, including peer risk taking behaviour
- Providing support to both children and young people who make or receive disclosures.

5.3 PROTECTIVE INTERRUPTING

Where children or young people disclose in front of peers, or at another inappropriate time, it may be appropriate to use strategies labelled 'protective interrupting', these include:

1. Gently interrupt the child by acknowledging them and preventing further disclosure. For example, "thank you, it sounds as though you have something really important to talk about..."
2. Be supportive and gently indicate that the child or young person can talk in a more private situation. For example, "...why don't we have a chat at recess?" or ask the student if they would like to leave the classroom to continue the conversation
3. Arrange to see the child as soon as possible in an appropriate location.

Note: for injuries seek appropriate medical assistance immediately.

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6. CONSULTATION AND SUPPORT

In addition to internal supports within Schools and Services, support and advice can be sought from other appropriate persons, such as the ASC's Child Safety Advocate and other ASC staff, lawyers, support services (section 13) and statutory authorities (section 2).

7. INFORMATION GATHERING

It is appropriate for Nominated Supervisors, Student Protection Officers, Principals, and at times, another person with Appropriate Authority, when they have developed or receive a concern, to identify and gather information that will assist in determining the most appropriate response to the concerns. In doing so, the following will be considered:

- In these circumstances, what information is reasonable to be sought and from what source?
- What information gathering is not appropriate given its potential impact on an investigation by a statutory authority (e.g. Child Safety or Police)?
- The reporting threshold for most statutory authorities (including in particular the Police and Child Safety) is 'reasonable suspicion' and it is the role of those authorities to investigate such suspicions, as relevant to either a child's need for protection, or criminal offences. Mindful of this, Schools and Services do not need be certain to report (in most cases only a reasonable suspicion is required) nor are they required to investigate concerns themselves in most cases.
- Any School or Service investigation regarding concerns (e.g. those directly associated with the School or Service environment) will occur in a carefully planned manner, as coordinated by the Principal or Nominated Supervisor and the governing body's delegate, in consultation with any relevant statutory authority and any other appropriate support (see section 2 and 6).
- In most cases Schools and Services do not need to photograph injuries. If required, Police or Child Safety will arrange for photographs.
- Schools and Services are to seek medical attention for known injuries as appropriate to the circumstance and will document such, using written notes and diagrams. School and Service staff will not seek to sight any injuries in an area normally covered by underwear, unless it occurs in another appropriate context and as per approved policy and procedure (e.g. such as providing to the physical care needs of an infant in a Service).

8. MATTERS RELATED TO PEERS WITHIN THE SCHOOL OR SERVICE

8.1 SCOPE

Where concerns relate to peers within a School or Service, the Policy and these Procedures are intended to compliment and work alongside local processes for behavioural guidance and management. When concerns relate to peers within a School or Service, the focus of the Policy and these Procedures is on:

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- Assessing risk of harm to children and young people whilst in the care, supervision or control of the School or Service and implementing reasonable strategies for managing such risk (see sections 9 and 10).
- Complying with law and any related reporting obligations, as described within the Policy and these Procedures (see section 2).

8.2 SEXUALISED BEHAVIOUR IN CHILDREN

Where the concerns relate to sexualised behaviour, the School or Service will engage with evidence-based resources and, where necessary, seek specialist advice, to assist in the management of such behaviour. It is important to remember that there is sexual behaviour that:

- is developmentally explainable;
- is cause for concern; or
- Indicates or causes harm.

The focus will be on identifying, understanding and responding to the behaviour in a way that manages the safety needs of all children and young people, with particular regard given to foreseeable danger.

[Traffic Lights: Sexual behaviours in children and young people](#), published by True Relationships and Reproductive Health

- [Traffic Lights App](#) (Apple)

[Recognising and Responding to Harmful Sexual Behaviours](#) Fact Sheet, the [Changing Futures Program](#) and other resources by the [Daniel Morcombe Foundation](#).

[Problem sexual behaviours and sexually abusive behaviours in Australian children and young people](#), published by Child, Family, Community, Australia.

9. RISK MANAGEMENT

Taking action to reduce any reasonably foreseeable danger to a child or young person is of paramount importance.

Schools and Services recognise that despite implementation of best practice approaches, risk always exists for children and young people when accessing organisations. To assist in mitigating this, Schools and Services adopt a risk management approach that aims to act in a preventative manner and reduce the likelihood of risks becoming realised. This same approach is applied when managing particular concerns or incidents.

There are criminal repercussions for individuals who fail to protect a child from a child sexual offence and civil penalties for organisations who breach the duty of care they owe to children in their care.

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When a concern is identified and throughout the management of a concern, risks to children and young people's physical and emotional/psychological safety are to be assessed and managed through appropriate actions, noting the following:

- Independent of the response from Police or Child Safety, a Nominated Supervisor, Student Protection Officer, Principal or other Appropriate Authority within the School or Service, will consider what actions are necessary and reasonable in the circumstances, to reduce risk of harm. This particularly applies if they relate to the School or Service's duty of care responsibilities. In these circumstances it may be particularly appropriate to consult with the Child Safety Advocate (ASC), Police, lawyers or other supports.
- Where it is reasonable to suspect immediate danger, School and Service staff are to contact the Police (e.g. call '000'). This is to occur within the context of the School or Services' localised processes to manage critical incident incidents.
- Where a response is believed to be required that day, a phone call is to be made to Police or Child Safety, to complement any written report (noting the phone call can occur before the written report is submitted). This call will usually be made by a Nominated Supervisor, Student Protection Officer, or the Principal. See [Key Contacts](#).

- Section 229BB of the *Criminal Code 1899*: Failure to protect
- Section 33D and E of the *Civil Liability Act 2003*: Duty to prevent child abuse

10. SAFETY AND SUPPORT PLANNING FOR CHILDREN AND YOUNG PEOPLE

Where children and young people are under the care, supervision, control or authority of a School and Service, Schools and Services are responsible for identifying reasonably foreseeable risks and putting strategies in place to reduce both the likelihood and impact of harm on children and young people. This risk management can often be assisted by developing safety and support plans. A 'plan' will be documented and usually has the following characteristics.

- Is customised to the safety and support needs of a particular child or group of children:
 - where there is a reasonable suspicion their behaviour may have caused, or place other children or young people at risk of, harm, or
 - where there is a concern for a child or young person's safety whilst in a relevant School or Service environment
- Respectfully describes the concern or worry in sufficient detail
- Describes any relevant strengths or actions already taken to address the concern or worry
- Considers all environments the child or young person is located within as part of attending the School or Service, e.g. classes, accessing toileting facilities, play areas, and after school care or activities.
- Reflects the relevant emotional/psychological and physical safety needs of relevant children and young people; and details of actions planned for those needs to be met.
- Includes actions that are reasonable to implement in the circumstances, proactive and preventative where at all possible, and reactive if necessary.

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- Allocates a person responsible for implementing each action, noting this may be a child or young person, or any other relevant stakeholder.
- Allocates an appropriate staff member responsible for developing, communicating, monitoring and reviewing the plan. Where possible and appropriate to the circumstances, this will be undertaken in collaboration with the child or young person, their family, relevant staff and other relevant stakeholders (other children, external professionals etc).
- Is communicated to relevant stakeholders who need to know the information to support the plan's success (section 12).
- Has a review timeframe and will be reviewed earlier if required due to changing circumstances.
- Agreed to by an appropriate representative of the School or Service, and where appropriate to the circumstances, the child or young person, their parent, carer or guardian and any other person responsible for taking action.

Note, this type of planning can also be used with children and young people when talking about safety and support strategies that may help them in other environments.

11. RECORDING AND RETAINING RECORDS OF CONCERNS

- [Protection Form](#)

All concerns that are reported to a Nominated Supervisor, Student Protection Officer or Principal are to be recorded on a [Protection Form](#). This form, and all supporting information/records, are to be stored appropriately. A key goal of the [Protection Form](#) is to provide a record that reflects and supports the decision-making process.

Where the concerns relate to:

- *physical or sexual abuse, or likely sexual abuse, that may require reporting to Police or Child Safety or*
- *inappropriate behaviour by a staff member or volunteer*

and it is practicable, the [Protection Form](#) is to be commenced by the staff member who first identifies, or otherwise receives, the concerns.

Given the additional roles and responsibilities that Nominated Supervisors, Student Protection Officers and Principals have, it can be difficult to identify whether a [Protection Form](#) is required. **A [Protection Form](#) is required to be commenced if the matter meets the definition of concern: *Information of whatever nature and from whatever source, that leads to a reasonable suspicion of circumstances that may have posed, or continues to pose, a risk to the physical or psychological safety of a child or young person.*** Some indicators may include:

- The matter requires or required reporting to a statutory authority (such as Police, Child Safety, Department of Education or the Queensland College of Teachers), or

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- There is relevant decision making to be recorded regarding, for example, decisions to not report the concerns to a statutory authority, or
- A safety and support plan is required to be developed, or
- The information may be required to be referred to in the future, for example, due to a pattern or escalation of concerns; or to meet responsibilities regarding the recording and sharing of information.

If there is any doubt as to whether a [Protection Form](#) is required, a [Protection Form](#) should be completed.

In retaining Protection Forms, Schools and Services, noting the sensitive and personal nature of the information recorded, will:

- have a record keeping system that provides access to necessary staff for reference, for example, if further concerns arise, or the school is required to account for actions taken.
- manage the form in keeping with the School or Service's record keeping and retention requirements, as well as in accordance with its privacy obligations.

Consistent with the Royal Commission into Institutional Responses to Child Sexual Abuse recommendation (8.4), Schools and Services' actions will be in keeping with the following principles for records and recordkeeping:

- Principle 1: Creating and keeping full and accurate records relevant to child safety and wellbeing is in the best interests of children and should be an integral part of institutional leadership, governance and culture.
- Principle 2: Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing.
- Principle 3: Records relevant to child safety and wellbeing should be maintained appropriately.
- Principle 4: Records relevant to child safety and wellbeing, should only be disposed of in accordance with law or policy.
- Principle 5: Individuals' existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent.

In addition to regulatory requirements, the ACSQ requires Schools and Services to maintain suitable record keeping as per the approved ACSQ Retention Schedule.

- ACSQ [Records Retention Schedule](#) for Anglican Schools

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12. PARTICIPATION, COMMUNICATION AND INFORMATION SHARING

12.1 INFORMATION SHARING

Section 176 of the *Education (Accreditation of Non-State Schools) Act 2017*

Australian Privacy Principles: <https://www.oaic.gov.au/privacy/australian-privacy-principles>

Information sharing by Schools is compliant with section 176 of the *Education (Accreditation of Non-State Schools) Act*. Additionally, both Schools and Services are required to comply with the Australian Privacy Principles in privacy legislation and any relevant supporting policy and procedures. Specific to these Procedures, the following should be noted.

12.1.1 WHERE CONCERNS RELATE TO CHILD SEX OFFENCES

Section 229BC of the *Criminal Code 1899*

Where the concern identified by an adult student, visitor, volunteer or staff member causes the person to believe on reasonable grounds that a child sexual offence is being or has been committed against a child by another adult, the person who has identified the concern is required to disclose the concern to the Police. A report to Police may not be required in certain circumstances, including where the person who identified the concern believes on reasonable grounds that the concern has already been disclosed to the Police.

Accordingly, the Principal (School), Nominated Supervisor (Service), or another delegate of the governing body is to inform the person when their concern has been reported to Police – refer to section 2.3 of these Procedures.

12.2 COMMUNICATION WITH CHILDREN AND YOUNG PEOPLE

While a concern is being managed, consideration must be given to the children or young people involved.

Where possible, one person is to be identified to be responsible for liaising with the child or young person throughout the entire process. This person is to be someone appropriate and trusted by the child or young person. Schools and Services will be particularly mindful to:

- Listen to what children and young people say without judgement and take their views seriously
- Ask children and young people about the types of support they need to participate and develop a plan for involving them
- Be honest and open about the things children and young people have control over or a say in, and those where they do not
- Never dismiss or give less value to children's or young people's views simply because they are not adults

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- Not necessarily prioritise an adult's opinion over that of a child or young person where they may differ
- Recognise that the most marginalised children and young people are often more vulnerable, and in doing so implement strategies for effective engagement. Specific consideration will be given to diversity associated with culture, disability, sexual and gender identity.

12.3 COMMUNICATION WITH ALL STAKEHOLDERS

Where allowed to by law, relevant stakeholders are to be kept informed of the progress and outcome of a matter. This includes, but may not be limited to:

- Children and young people
- Their parents, carers and guardians
- People who raise or receive concerns
- People whose behaviour the concerns relate to
- Broader cohorts within the School or Service community
- People or organisations identified as necessary to reduce risk of harm to a child or young person

Such information sharing will be to:

- Assist in the safety and wellbeing of children or young people
- Assist in the successful operations of the School or Service

Communication of complex matters will often require consultation and support (section 6).

Where allowed by law, and where the sharing of such information will not cause harm, relevant stakeholders will:

- Be informed of the potential outcomes for certain types of complaints, as well as the final outcome and the reasons for it.
- Be informed of what action was taken to deal with the concern.
- Receive reasons for decisions that affect them, and advice about avenues for review of decisions.
- Explain, where relevant, how complaints can be made regarding the management of the matter. These may include internal and external options (refer to the Policy for information regarding complaints).

Finding out about the management of a concern may be traumatic for a relevant stakeholder, irrespective of the outcome. This doesn't mean the information shouldn't be shared, however consideration is required as to the most appropriate way to communicate information to the relevant person, and the support they might require.

When managing a concern, Schools and Services will proactively consider how relevant stakeholders will be appropriately supported. This includes monitoring for and managing inappropriate adverse consequences.

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12.4 INFORMATION SHARING WITHIN THE QUEENSLAND CHILD PROTECTION SYSTEM

Chapter 5A and Section 186 of the *Child Protection Act 1999*

12.4.1 CHILD SAFETY INFORMATION SHARING GUIDE

Information Sharing Guidelines: <https://www.cyjma.qld.gov.au/resources/dcsyw/protecting-children/child-family-reform/information-sharing-guideline.pdf>

Information Sharing Guidelines are issued by the Queensland Government under Section 159C of the *Child Protection Act*. They aim to support and guide organisations and agencies within the Queensland child protection and family support system, including government and non-government organisations to:

- understand their obligations when they share information under the Act
- outline what information can be shared, the circumstances in which it may be shared and who may share information
- define when information must be shared with Child Safety
- support the legislative framework for information sharing
- provide practical guidance about how to store and manage personal information

12.4.2 CONFIDENTIALITY OF NOTIFIER DETAILS

When reporting to Child Safety, the identity of the person who is listed as the Notifier is protected. This means their identity will not be disclosed by Child Safety or the Police unless the person provides their consent, or it is otherwise required to be provided by law. This also means that Schools and Services should be careful to not disclose the identity of a Notifier to a third party unless confident that to do so is lawful. This includes where responding to a subpoena. Consult and seek support as required (section 6).

12.5 INFORMATION SHARING WITH POLICE

Information is to be shared with a Law Enforcement Agency (e.g. Queensland Police Service or Australian Federal Police) where the sharing is necessary for the prevention, detection, investigation, prosecution or punishment of a criminal offence or a breach of a law imposing a penalty or sanction.

Section 176(e) of the *Education (Accreditation of Non-State Schools) Act 2017*

12.6 NOTIFICATION TO INSURERS

Where a concern is associated with a School or Service and there may be a need to make an insurance claim, either now or into the future, it is likely (due to relevant clauses in insurance policies) that the School or Service's insurer will need to be notified of the matter. This decision will

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be made by the Principal or Nominated Supervisor in collaboration with the governing body's delegate. Consultation and support may be required to inform this decision (see section 6).

Where this occurs, the School or Service should inform the insurer of the precise facts or circumstances that it reasonably believes might give rise to a claim against it and other information requested by the insurer.

13. REFERRALS

Chapter 5A of the *Child Protection Act 1999*

Where a concern is identified, it is often appropriate to refer children and young people, or the family, to support services. By referring to support, Schools and Services can help concerns to be addressed before they escalate further.

Referrals will usually be undertaken by a Student Protection Officer in Schools or a Nominated Supervisor in Services. In Services, referrals to support require the family's consent. In Schools, consent is preferred, however Principals can make referrals without consent. Note the following support options.

13.1 FAMILY AND CHILD CONNECT (FaCC)

<https://www.familychildconnect.org.au/professionals>

Call: 13 32 64 (13 FAMILY)

Funded by the Queensland Government, FaCC has locations all across Queensland that can provide:

Information and advice: Information and advice on how you could respond. This may include advice on how to keep the family engaged and *information on local support services*. Note, you don't need a family's consent to access this option if you do not identify the family to FaCC.

Referral to a support service: Help you refer the family to a support service.

Active engagement and referral: Where families have multiple or complex needs, FaCC will engage them in a more detailed needs assessment and seek their consent to be referred to an Intensive Family Support service, or other service options.

An experienced Child Protection Practitioner is also based at each FaCC location to help identify and respond to more serious concerns.

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13.2 DOMESTIC AND FAMILY VIOLENCE (DFV)

DV Connect: <https://www.dvconnect.org/>

The Queensland Government also publishes the following information on domestic and family violence support: <https://www.qld.gov.au/community/getting-support-health-social-issue/support-victims-abuse/domestic-family-violence>

Local support services can be found: <https://www.qld.gov.au/community/getting-support-health-social-issue/support-victims-abuse/domestic-family-violence/find-local-support>

Helplines include:

- DVConnect Womensline: 1800 811 811
- DVConnect Mensline: 1800 600 636
- 1800RESPECT: 1800 737 732 (24/7 information, referral and counselling for sexual assault and DFV).

13.3 MENTAL HEALTH SUPPORT FOR CHILDREN AND YOUNG PEOPLE

raisingchildren.net.au is a high-quality source of information for parents and professionals.

Headspace: headspace.org.au. Headspace is the National Youth Mental Health Foundation providing early intervention mental health services to 12-25 year olds. Headspace can help young people with mental health, physical health (including sexual health) alcohol and other drug services, and work and study support.

Kids Helpline: <https://kidshelpline.com.au/> or call 1800 551 800. Kids Helpline is Australia's only free, confidential 24/7 online and phone counselling service for young people aged 5 to 25. Qualified counsellors at Kids Helpline are available via WebChat, phone or email anytime and for any reason.

Child and Youth Mental Health Service (CYMHS):

<https://www.childrens.health.qld.gov.au/chq/our-services/mental-health-services/>. CYMHS specialises in helping infants, children and young people up to the age of 18 who have complex mental health needs. They provide community and hospital-based services, outreach and telepsychiatry programs, early intervention, forensic and other specialty services.

In emergencies, it may be appropriate to call an ambulance, or access a hospital emergency department. In non-emergencies, it may be appropriate to ask families to engage with their GP for appropriate intervention and referral.

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13.4 ONLINE SAFETY

Where concerns relate to online abuse, guidance can be sought from the eSafety Commissioner <https://www.esafety.gov.au/>. The eSafety Commissioner has powers relating to cyberbullying, image-based abuse, and illegal and harmful online content.

To guide appropriate actions, the eSafety Commissioner also publishes the following Toolkit for schools: <https://www.esafety.gov.au/educators/toolkit-schools>

<https://www.thinkuknow.org.au/> is an education program led by the Australian Federal Police focused on preventing online child sexual exploitation.

13.5 ABORIGINAL AND TORRES STRAIT ISLANDER FAMILIES

The Queensland Government funds *Aboriginal and Torres Strait Islander Family Support Services* with an explicit goal of making it easier for Aboriginal and Torres Strait Islander families in communities across Queensland, to access culturally responsive support to improve their social, emotional, physical and spiritual wellbeing, and build their capacity to safely care for and protect their children.

For information on local service options visit:

<https://familysupportreferral.org.au/>

<https://www.cyjma.qld.gov.au/protecting-children/child-family-reform/meeting-needs-requirements-aboriginal-torres-strait-islander-children-families-communities/aboriginal-torres-strait-islander-family-wellbeing-services>

14. REVIEW AND CONTINUOUS IMPROVEMENT

Each School and Service will have processes in place to analyse the management of each concern to check:

- processes are being followed
- timeframes are being met
- complaint trends/patterns and risks relating to certain individuals, are identified
- systemic problems are detected and mitigated by the organisation

This will usually be undertaken through the administration of the Child and Youth Risk Management Committee. Relevant issues will be reported through quarterly and annual reporting (section 19).

[Working with Children in Anglican Education Policy, Guidelines and Procedures](#)

[National Principles for Child Safe Organisations](#)

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PART C: PREPARING TO RESPOND

[Working with Children in Anglican Education Policy, Guidelines and Procedures](#)

[National Office of Child Safety, including the Complaint Handling Guide](#)

[National Principles for Child Safe Organisations](#)

Sections 171 and 172 of the *Working with Children (Risk Management and Screening) Act 2000* and section 4 of the *Regulation 2020*

Whilst Schools and Services take all reasonable steps to prevent abuse of a child or young person (refer to the Working with Children in Anglican Education Policy), concerns for the physical and psychological safety of children and young people will continue. As such Schools and Services also take reasonable steps to prepare for responding appropriately to these concerns.

15. CULTURE AND ENVIRONMENT

To be able to respond appropriately to concerns, Schools and Services foster a culture and care environment that encourages concerns to be raised. Schools and Services, for example, through their Child and Youth Risk Management Committee, have a plan in place for doing so, including through operationalising the following on a local level.

15.1 RAISING CONCERNS

It's important to create an environment where children and young people are comfortable about speaking out if anything is worrying them. They particularly need to:

- have access to reliable, consistent adults
- be cared for in environments where their wellbeing is prioritised
- be able to recognise potential abuse and know it is wrong
- know who they can talk to about abuse or potential abuse

Many children and young people will seek help because they know where to go and believe that it will make a difference. Others may not have the confidence to seek support or may be too scared to ask for help. They may not get the help they need until they reach crisis point.

The people they choose to disclose to need to listen, understand and respond appropriately, so the child gets the help, support and protection they need; and Schools and Services need to make it as easy as possible to find and take up the offer of help.

Schools and Services can, for example:

- Embed practical strategies that demonstrate wellbeing is prioritised through positive role modelling and leading by example.
- Reinforce positive messages about those who seek help – seeking help is a sign of strength.
- Encourage parents to support their children and young people in seeking help.

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- Be positive about children and young people, their capacity for change and their resilience. Engage with young people both in terms of their strengths and their challenges.
- Build trust by treating children and young people with respect.
- Communicate effectively about the strategies you implement - lack of awareness is a significant barrier to people seeking help.

15.2 ADVERSE CONSEQUENCES

Schools and Services need to support people to raise concerns and be clear that no one will be penalised or suffer adverse consequences for doing so. At the very least, this means:

- Communicating this commitment through information sharing, inductions and training relevant to the Policy, or the School/Service's behavioural expectations.
- Proactively considering how people who raise concerns will be supported and how this will be monitored when a matter is being managed.
- Having systems in place to assess, investigate and performance manage any behaviour that could be perceived as creating such adverse conditions towards the person who raised a concern.

15.3 PARTICIPATION

Facilitating effective participation from children and young people, and their families, serviced by the School or Service, will substantially increase the success associated with implementing the Policy. In developing strategies to achieve effective participation, Schools and Services will:

- Apply a 'child friendly', inclusive approach.
- Seek, listen to and value feedback from children and young people (and their families).
- Recognise that the most marginalised children and young people are often more vulnerable, and in doing so implement strategies for effective engagement. Specific consideration will be given to diversity associated with culture, disability, sexual and gender identity.
- Ask children and young people about the types of support they need to participate, and develop a plan for involving them.
- Be honest and open about the things children and young people have control over or a say in, and those where they do not.
- Help children and young people to help each other, by seeking to equip them with the skills and tools to support their peers. This includes appropriate actions as a bystander.

15.4 ADDRESSING BARRIERS

Schools and Service need to consider what barriers may be in place for any child and young person to raise concerns, and make reasonable adjustments to meet their needs. Barriers may be those caused by:

- an environment, such as online learning, or the physical location of appropriate staff, that impacts on successful access to appropriate support; and

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- marginalisation through, for example, culture, language, disability, or sexual or gender orientation.

Some children and young people are reluctant to seek help because they feel they don't have anyone to turn to for support. They may have sought help in the past and had a negative experience, which makes them unlikely to do so again. They may also, for example:

- feel that they will not be taken seriously;
- feel too embarrassed to talk to an adult about a private or personal problem;
- lack trust in the people around them (including parents) and in the services provided to help them;
- worry about confidentiality;
- fear the consequences of asking for help;
- worry they will be causing trouble and making the situation worse;
- find formal procedures overwhelming.

It is also important to note that not all children and young people realise they have experienced abuse, for example if they have been groomed.

15.5 MULTIPLE PATHWAYS

Schools and Services will provide various ways for children and young people to raise concerns. Key considerations are:

- Children and young people's feedback about how they prefer to communicate;
- Variety of developmental stages, and the diversity of children and young people attending the school or service;
- Helping children and young people to identify adults they can trust and ways to access them;
- Sharing information about the role of Student Protection Officers (in Schools) and appointing a sufficient number of suitable persons to create various access options for all children and young people;
- The use of technologies. These should be complementary to other ways of supporting children and young people.

15.6 BEHAVIOURAL EXPECTATIONS

[Our Commitment, Creating and environment for children and young people to thrive: Code of Conduct for Anglican Schools and ECS](#)

Schools and Services must ensure all persons acknowledge their agreement to comply with any required behavioural expectations (and have evidence of this). This includes, but is not limited to:

- any applicable Code of Conduct or similar requirement.

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- any role they have in assisting with the implementation of the School or Service's policy implementation and, responsibilities to provide care and manage risk of harm to children and young people. Refer to section 17 of these Procedures.

15.7 PROFESSIONAL BOUNDARIES

[Professional Boundaries: A Guideline for Queensland Teachers](#)

Schools and Services will implement specific strategies to have staff and volunteers maintain professional boundaries, including:

- Acknowledging their agreement to comply with behavioural expectations (see section 14.6)
- Provide training regarding professional boundaries, reporting requirements and the consequences of any failure to report;
- Monitoring and policing boundary violations, including disclosing any concern, including those related to themselves, whether current or historic, to an Appropriate Person (section 1);
- The consequences of failing to maintain boundaries or make reports.

Maintaining appropriate personal, professional and protective boundaries and behaviours, i.e. how staff and volunteers present themselves, their interactions and general conduct; helps keep children and young people safe from harm and reduces the risk of allegations of harm.

Staff and volunteers are in a unique position of trust, care, responsibility and influence regarding children and young people. This means there is an inherent power imbalance. Boundaries shape staff and volunteer relationships with children and young people, families, care-givers and colleagues. This does not mean relationships are detached; authentic and supportive relationships can be developed without placing children and young people at risk.

Applying expectations about behaviour and boundaries is similar to herd immunisation. Large numbers of people are immunised to protect a population, particularly our most vulnerable, from the adverse consequences of various viruses. Similarly, larger numbers of people monitoring and policing boundaries can help protect children and young people from the adverse consequences of abuse, through limiting the opportunity for offenders to act. As discussed in section 3, *'calling out' behaviour that may be inconsistent with requirements or not in the best interests of children or young people's safety or wellbeing, is expected, valued and sought to be normalised.*

Offenders, or potential offenders, are difficult to detect. They not only groom children and young people, but also the adults around them. Offenders focus on reducing any suspicion towards themselves and creating opportunities to abuse. A common attribute of offenders is a proclivity to prelude abusive behaviour with habitual rule breaking and boundary violations which often help to create an environment that enables abuse to be perpetrated. Monitoring and policing boundaries across all staff and volunteers helps discourage offenders and creates an environment where the likelihood of abuse is reduced (known as a disabling environment).

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16. UNDERSTANDING THE DIFFERENCES BETWEEN A SERVICE, COMPARED TO A SCHOOL

It is important to understand the differences between a Service and a School, as related to the Policy. This is particularly important where Services and Schools are co-located, but can also be especially challenging when staff work across both the Service and the School.

These differences are due to variation in law and regulation, such as:

- Services are separate registered businesses and types of regulated employment, under the *Working with Children (Risk Management and Screening) Act*.
- Services must meet the requirements in *Education and Care Service National Law and Regulations* (including all reporting obligations from the Approved Provider to the Regulatory Authority), while Schools (Prep to Yr. 12) are required to comply with the *Education (Accreditation of Non-State Schools)*, *Education (General Provisions)* and *Education (Queensland College of Teachers) Acts and Regulations*.
- All Service staff over 18 years are mandatory reporters under the *Child Protection Act* (see section 2).
- Also, within the child protection system, under the *Child Protection Act* the Principal of a Non-State School (Prep to year 12) (as a 'particular Prescribed Entity') has a different role in information sharing than a person in a Service, including an Approved Provider (see section 12).

16.1 IMPLICATIONS

16.1.1 ROLES

Given Student Protection Officers (SPOs) are a requirement under *Education (Accreditation of Non-State Schools) Regulations*, Service staff are not appointed as SPOs unless they are also employed in a different role at the School (e.g. a role servicing P to 12 children not including OSHC/Vacation Care).

The roles and responsibilities of staff in Services are based on their positional responsibilities within the Service (e.g. Responsible Person, Nominated Supervisor) as defined in the *Education and Care Service National Law and Regulations*. All Nominated Supervisors, Directors/Coordinators and other appropriate persons are offered Child Protection Leader Induction Training, to support them to meet the Services' responsibilities regarding child protection and is pertinent to their governing legislation.

Where professional development is topic based relevant School and Service staff will be invited to the same sessions.

16.1.2 REPORTING

For relevant matters, Services must ensure they meet the reporting obligations of the Approved Provider to the Regulatory Authority (see section 2).

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16.1.3 INFORMATION SHARING AND REFERRAL TO SUPPORTS

Service staff are not to receive personal information from the School about individual families where a child is not enrolled in their Service (e.g. is enrolled at the School and not at the Service) unless the sharing of information is necessary to enable the School or Service to take appropriate action for the safety of a child (at risk or in need of protection). If the child does not attend the Service, the chance of this occurring is remote.

Services are classified in legislation as a 'service provider' and the ability to share information without a family's consent is limited. Information can be shared where the Service:

- is reporting to or sharing relevant information with a statutory authority such as Police, Child Safety or the regulatory authority;
- they reasonably believe that the sharing of relevant information is necessary to:
 - allow either the Service or the School to decide if a report to Child Safety is appropriate
 - help decrease the likelihood of the child becoming in need of protection
 - keep a record about giving a report to Child Safety

This means families, with children who only attend the Service and not the School cannot be referred to other support services without the family's consent, whereas Principals of Schools can refer families without consent to other support services (although consent remains preferred).

17. STUDENT PROTECTION OFFICERS (SPOs)

- Appendix D of the Policy: Notification of appointment of Student Protection Officers
- SPO Poster templates

In accordance with section 16 (3) of the *Education (Accreditation of Non-State Schools) Regulation*, there must be at least two stated staff members in each school.

SPOs are staff members appointed by a Principal in a School. Principals must have at least two staff appointed to this role, however more are usually necessary. In appointing SPOs the Principal must be sure that these staff members understand and have capacity to adhere to the Policy and these Procedures, and their related roles and responsibilities.

The following key attributes are to be considered when appointing SPOs:

- *Trustworthy*. Children and others need to feel they can trust the person they are talking with.
- *Contemporary knowledge* of child safety and the role of the School/ECS in the safety and wellbeing of children, and ability to apply this knowledge to meet the responsibilities of the role.
- Ability to work *collaboratively* with all stakeholders towards the achievement of child safety and wellbeing outcomes.

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- Ability to *communicate effectively*, including approaching and responding to child safety issues with appropriate *sensitivity* and appreciation of the impact of these issues on individuals.
- *Sufficient authority* within the School, including leadership skills and the ability to direct other staff, where appropriate, and manage upwards.

Prior to commencing in the role, the staff member will have:

- Read the Policy and these Procedures
- Complete the SPO Induction, administered by the ASC

To maintain the role of SPO the staff member will, where practicable, attend professional development as arranged by the ASC.

18. INFORMATION PROVISION, INDUCTION AND TRAINING

- Child friendly versions of the Policy
- Additional Resources
 - Training material on relevant processes and responsibilities in the Policy and these Procedures
- Working with Children in Anglican Education Policy, Guidelines and Procedures (including Statement of Commitment)

In accordance with the *Work, Health and Safety Act*, Schools and Services are to provide information, instruction and supervision, necessary to protect the children and young people they service.

The *Working with Children (Risk Management and Screening) Regulations* require Schools and Services to provide communication and support for implementing the risk management strategy, including written information about the risk management strategy for, and where the strategy may be accessed by:

- Persons employed or otherwise engaged, and
- Children, or parents of children, who receive a service or take part in an activity associated with the School or Service.

Schools and Services need to make the Policy and these Procedures available, and ensure relevant changes are notified to any relevant stakeholder, including, as is developmentally appropriate, children and young people; parents, carers and guardians; and staff, volunteers and visitors. At minimum, as described in the Policy:

- The Policy and these Procedures are published on the ASC, and each respective School or Service website. This includes child friendly versions of the Policy.
- Each School or Service will detail their localised approach to providing access to the Policy and these Procedures within their respective Child and Youth Risk Management Strategies.

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Schools and Services are required to provide information, training and instruction, necessary to protect children and young people from risks to their safety.

How this is implemented is a School or Service's operational responsibility, will vary across differing cohorts within the School or Service, and is to be described within the School or Service's Child and Youth Risk Management Strategy.

The following minimum requirements apply, and Schools/Services are responsible for being able to evidence their implementation.

18.1 CHILDREN AND YOUNG PEOPLE

Schools and Services are to provide developmentally applicable, and culturally safe and appropriate information on how children and young people can seek assistance and report any concerns. This includes, but may not be limited to:

- what safety and wellbeing means;
- the organisation's commitment to their safety and wellbeing, and how this is implemented in operations. This includes who to talk to within the School or Service, and any relevant information about the School or Service's risk management strategy;
- their rights and responsibilities, e.g. regarding safety, information and participation;
- safe environments and protective strategies.

In part, this may occur using developmentally appropriate abuse prevention and respectful relationships programs/content.

National Code of Practice for Providers of Education and Training to Overseas Students: Standard 5 (legislated instrument)

18.2 VISITORS

Schools and Services are to provide visitors with information on responsibilities relevant to the Policy and these Procedures. The nature of this information will be determined by the School or Service, as relevant to the purpose of the person's role and responsibilities, and:

- will first occur prior to the person commencing their intended role;
- can occur through either verbal presentation or through written material (including, for example, information provided and agreed to on sign-in to the School or Service);
- will occur on at least an annual basis.

18.3 VOLUNTEERS AND STAFF

Schools and Services will provide volunteers and staff with information on responsibilities relevant to the Policy, and access to the Policy and these Procedures. The nature of this information will be determined by the School or Service, as relevant to the purpose of the person's role and responsibilities, and:

- will first occur prior to the person commencing their intended role;

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- can occur through either verbal presentation or through written material;
- will occur on at least an annual basis.

Volunteers and staff must acknowledge in writing that they have read and agree to the Policy and these Procedures, that they will report any suspected abuse and that they will advise immediately should an allegation of abuse be raised against them.

Schools and Services will enable volunteers and staff to be equipped, through ongoing education and training as relevant to their role, with the knowledge, skills and awareness to help children and young people have their safety needs met.

Schools and services will provide information to support volunteers and staff, proportionate and relevant to their role and responsibilities, to understand matters related to the school or service's child and youth risk management, and the role they have in helping to manage risks, such as:

- helping to create environments that reduce the opportunity for abuse or harm to occur;
- being attuned to signs of harm and helping identify risks of harm to children and young people, including harm caused by other children and young people;
- helping facilitate child-friendly ways for children and young people to express their views, participate in decision making and raise their concerns;
- helping handle disclosures or suspicions of harm to children;
- supporting colleagues who disclose harm;
- understanding the existence and application of applicable law and any obligations that they may have under that law; and
- effectively implementing the organisation's relevant policies and related processes, focused on responding effectively to issues regarding child safety and wellbeing.

For volunteers and short term/seasonal and new staff, this information will be made available through induction (required on at least an annual basis), whereas for staff in continuous service this will occur through annual training (discussed below).

The *Working with Children (Risk Management and Screening) Regulations* require Schools and Services to provide communication and support for implementing the risk management strategy, including:

- Training materials for persons employed or otherwise engaged:
 - to help identify risks of harm to children
 - to help handle disclosures or suspicions of harm to children
 - about matters included in the risk management strategy

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18.3.1 ADDITIONAL CONSIDERATIONS FOR STAFF AND MEMBERS OF SCHOOL COUNCIL/ ECS MANAGEMENT COMMITTEE

In addition to the above, each School and Service will ensure staff and members of the School Council/ ECS Management Committee are trained annually in:

- using training material provided by the ASC, processes detailed in the Policy and these Procedures, and
- information on local implementation as provided by the School or Service.

In accordance with section 16 (4)(c) of the *Education (Accreditation of Non-State Schools) Regulations*, governing bodies must ensure all staff are trained annually in implementing these processes.

18.3.2 ADDITIONAL CONSIDERATIONS FOR STUDENT PROTECTION OFFICERS (SCHOOLS) AND NOMINATED SUPERVISORS (SERVICES)

In addition to the above, each School and Service will ensure Student Protection Officers (Schools) and Nominated Supervisors (Services) participate in:

- Schools: Student Protection Officer Induction (administered by the ASC) prior to commencing in the role;
- Services: Child Protection Leadership Induction (administered by the ASC);
- Professional development as arranged by the ASC.

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PART D: ASSURANCE ACTIVITIES

19. ASSURANCE

[Working with Children in Anglican Education Policy, Guidelines and Procedures](#)

[National Office of Child Safety](#)

[National Principles for Child Safe Organisations](#)

Schools and Services will participate in quality assurance processes, as directed by the ACSQ or a regulatory authority. This includes, but may not be limited to, reporting undertaken by the Child and Youth Risk Management Committee, on a quarterly basis to the Principal and School Council or Nominated Supervisor and Service Management Committee, and annual reporting to the School or Service's governing body (or delegate).

Reporting will include, but may not be limited to:

- issues relevant to:
 - a. evidencing effective implementation of the Policy and these Procedures
 - b. learnings from the application of the Policy and related matters, to the management of the School or Service, including strategic risks;
- details of staff allocated and systems in place to support operations related to the Policy;
- details of how relevant people within the School or Service community are made aware of, given access to and trained in implementing the Policy and these Procedures, as described in the Policy;
- the number of concerns raised and matters reported to each statutory authority; and
- any issues in the management of these matters that are relevant to the leadership and governance associated with developing and maintaining a child safe culture.

Note: Where a School or Service is controlled by the ACSQ a copy of the annual report is to be provided to the Executive Director, ASC.

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20. VERSION CONTROL

These Procedures replace both the Student Protection in Anglican Schools and the Child Protection in Anglican Education & Care Services Procedures.

Version	Date	Document owner	Comments
1.0	16/12/2021	Anglican Schools Commission	Approved
1.0	18/01/2022	Anglican Schools Commission	Hyperlinks inserted for protection form and key contacts
1..1	11/04/2022	Anglican Schools Commission	Clarification e.g. correct references

21. SOURCES

The following external sources have been used to inform these Procedures:

[Bullying No Way](#)

[Child, Family, Community Australia, Australian Institute of Family Students, Australian Government.](#)

The Child Family Community Australia (CFCA) information exchange's mission is to be the primary source of quality, evidence-based information, resources and interactive support for professionals in the child, family and community welfare sector. It plays a critical role in closing the gap between research, policy and practice. CFCA's long term vision is to contribute to improved outcomes for children and families in need of support and/or protection.

[Daniel Morcombe Foundation](#)

[Department of Children, Youth Justice and Multicultural Affairs, Queensland Government](#)

[Department of Communities, Government of Western Australia](#)

[Growing and Developing Healthy Relationships, Department of Health, Government of Western Australia](#)

[NAPCAN: National Association for the Prevention of Child Abuse and Neglect \(AUS\)](#)

[NSPCC: National Society for the Prevention of Cruelty to Children \(UK\)](#)

[Queensland Legislation](#)

[Queensland College of Teachers](#)

[Queensland Police Service](#)

[The Australian Human Rights Commission](#)

[The National Office of Child Safety](#)

[True Relationships and Reproductive Health](#)

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PART E: APPENDICES

APPENDIX 1: KEY TERMS AND DEFINITIONS

Abuse: Behaviour that causes, or could reasonably be expected to cause, harm. It can be a single incident, or several incidents that take place over time. For the purpose of the Policy and these Procedures, examples of Abuse include:

(a) A SEXUAL OFFENCE COMMITTED AGAINST, WITH OR IN THE PRESENCE OF A CHILD

- (i) Sexual offences refer to criminal conduct of a sexual nature and includes:
 - (A) sexual assault
 - (B) indecent acts
 - (C) production or possession of child abuse material
 - (D) 'grooming' a child in order to commit a sexual offence. Grooming concerns predatory conduct undertaken to prepare a child for sexual activity at a later time.

(b) SEXUAL MISCONDUCT

- (i) Sexual misconduct includes behaviour, physical contact, speech or other communication of a sexual nature, inappropriate touching, grooming behaviour, and voyeurism. This captures a broader range of inappropriate behaviours of a sexual nature that are not necessarily criminal. Examples of sexual misconduct include:
 - (A) an adult developing a close and inappropriate relationship with a child which crosses professional boundaries
 - (B) an adult inappropriately discussing sex and sexuality with a child
 - (C) other overtly sexual acts that could lead the ASC to take disciplinary or other action.

(c) PHYSICAL VIOLENCE

- (i) Physical violence includes an act that causes physical injury or pain. Examples of physical violence can include:
 - (A) hitting/kicking/punching
 - (B) pushing/shoving/grabbing/throwing/shaking
 - (C) using an object to hit or strike
 - (D) using restraint or excessive force that is inappropriate to the situation.
- (ii) Physical violence does not include lawful behaviour. For example:
 - (A) reasonable steps taken to protect a child from immediate harm, such as taking a child's arm to stop them from going into oncoming traffic
 - (B) medical treatment given in good faith by an appropriately qualified person, such as a senior first aid officer administering first aid.

(d) BEHAVIOUR THAT CAUSES SIGNIFICANT EMOTIONAL OR PSYCHOLOGICAL HARM TO A CHILD

- (i) Examples of behaviours that may cause emotional or psychological harm include:
 - (A) exposure to violence or threats of violence, including family violence
 - (B) persistent hostility/rejection
 - (C) humiliation/belittling

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- (D) scapegoating.
- (ii) Please note the following does not constitute behaviour that causes significant emotional or psychological harm to a child:
 - (A) a person takes reasonable steps to protect a child from immediate harm
 - (B) a person with responsibility for discipline takes lawful and reasonable disciplinary action, such as sending a child to sit in 'time out' for a period of time, in line with organisational policy
 - (C) the conduct is related to providing medical treatment or care given in good faith, such as a first aid officer administering first aid.
- (e) SIGNIFICANT NEGLECT OF A CHILD
 - (i) The neglect:
 - (A) must be more than minor and insignificant
 - (B) does not need to have a lasting or permanent effect
 - (C) may be an ongoing situation or a one-off incident, as long as it is not minor in nature.
 - (ii) Examples of different types of neglect include:
 - (A) supervisory neglect, which is the absence or inattention of a person which places the child at risk of physical harm or injury, sexual abuse or allows other criminal behaviour towards the child
 - (B) physical neglect, which is the failure to provide basic physical necessities for a child, such as adequate food, clothing and housing
 - (C) medical neglect, which is the failure to provide for appropriate medical care for a child, including a failure to acknowledge the seriousness of an illness or condition, or deliberately withholding appropriate care.

Also see: <https://aifs.gov.au/cfca/publications/what-child-abuse-and-neglect>

The Queensland Government publishes the following information on child abuse: <https://www.cyjma.qld.gov.au/protecting-children>. This information is referenced here as it is published by the Department that administers the *Child Protection Act 1999*, including the requirement for relevant persons to notify reportable suspicions a child is in need of protection from physical or sexual abuse.

Adult student: a person enrolled as a student of a School who is 18 years or older.

All persons: All children and young people, **staff, volunteers** and **visitors** in the School or Service.

Appropriate Authority:

An Appropriate Authority in a School refers to members of the senior or executive leadership team who include, but are not limited to:

- The Principal.
- The Deputy Principal, Heads of 'Schools' (e.g. Junior, Middle, Senior), Assistant Heads, Deputy Heads, Deans and Directors.

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An Appropriate Authority in an ECS refers to the Director/Coordinator or Nominated Supervisor of the Service.

In some circumstances (e.g. complaints), Schools owned or controlled by ACSQ or ECS for which ACSQ is the Approved Provider, the Chair of a school council or ECS management committee or the Executive Director, Anglican Schools Commission may be considered as an Appropriate Authority. For other Anglican Schools or ECS, the Chair of the School's governing body or ECS management committee may be considered an Appropriate Authority.

Appropriate Person: the term 'Appropriate Person' will differ depending on the person who is reporting a concern. Please see the table below to ascertain who the 'Appropriate Person' would be in different circumstances.

<i>Person with concern</i>	<i>Appropriate persons to share information with</i>
<i>Children and young people</i>	<p>Children and young people are asked to raise any concerns (impacting either themselves or their peers) with <u>an adult they trust</u>, so that the adult can help.</p> <p>Student Protection Officers (in Schools) and Responsible Persons and Nominated Supervisors (in Services) are particularly available to help</p> <p>It is also recognised that friendship and support from peers is important to help children and young people feel safe and less isolated.</p>
<i>Visitors, including parents and carers</i>	<ul style="list-style-type: none"> • In Schools: A Student Protection Officer or person with Appropriate Authority • In Services: A person with Appropriate Authority
<i>Volunteers and staff</i> <i>(staff are also to refer to relevant sections below regarding statutory reporting obligations)</i>	<ul style="list-style-type: none"> • In Schools: A Student Protection Officer or the Principal • In Services: A Nominated Supervisor or the Approved Provider <p>Where required to guide the application of the Policy, volunteers and staff are also able to share information with staff from:</p> <ul style="list-style-type: none"> • The Anglican Schools Commission • The Office of the Director of Professional Standards (regarding sexual misconduct)

Approved Provider: Holds provider approval for the Education and Care Service under the *Education and Care Service National Law 2018*.

As soon as practicable: As soon as is able to be done (often immediately).

ASC: the Anglican Schools Commission.

Archbishop and Bishops: Refers to the Archbishop of Brisbane and the ACSQ Regional Bishops, as well as the Bishop of the North Queensland Diocese.

Child Abuse: Please see definition of *Abuse*.

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Child and Youth Risk Management Strategy: Sections 171 and 172 of the *Working with Children (Risk Management and Screening) Act 2000* requires our Schools and Services to have a Child and Youth Risk Management Strategy that implements employment practices and procedures to promote the wellbeing of a child affected by the regulated employment or regulated businesses undertaken as part of the School or Service and to protect the child from harm.

Child safe principles: [National Principles for Child Safe Organisations](#) as published by the Australian Human Rights Commission.

Child Safety: Refers to the Queensland Department of Children, Youth Justice and Multicultural Affairs.

Children and young people: Consistent with the *Child Protection Act 1999*, a child means anyone under the age of 18 years. In addition to this, in this context, the terms child and/or young person are used. This includes young people who are 18 years or older where they are enrolled in an Anglican School. Children and young people are also commonly referred to as students (defined below).

Note: for the purpose of the Policy and the Procedure, requirements related to students apply to any child or young person associated with the School or Service or where the concern is obtained through a person's engagement with a School or Service.

Child sexual offences: Are detailed within the *Criminal Code 1899*.

Concern: Information of whatever nature and from whatever source, that leads to a reasonable suspicion of circumstances that may have posed or continues to pose a risk to the physical or psychological safety of a child or young person. This includes, but may not be limited to:

- incidents or allegations of sexual, physical, or other abuse or inappropriate behaviour;
- matters that are recent or historical in nature.

Conflict of interest: A conflict of interest is a situation in which someone in a position of trust or responsibility has competing professional or personal interests. A conflict may exist even if no unethical or improper acts result. A conflict can create an appearance of impropriety that can undermine confidence in the person or the School or Service.

Director of a school's governing body: As defined in section 9 of the *Education (Accreditation of Non-State Schools) Act 2017*. See Appendix A of the Policy for more information.

Education and care professionals: An individual, other than a volunteer or an individual under the age of 18, who is:

- (a) any of the following under the *Education and Care Services Act 2013*:
 - i. an approved provider;
 - ii. a supervisor for a QEC approved service;
 - iii. an educator for a QEC approved service; or
- (b) any of the following under the *Education and Care Services National Law (Queensland)*:

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- i. an approved provider;
- ii. a nominated supervisor for an approved education and care service;
- iii. an educator for an approved education and care service;
- iv. a family day care co-ordinator for an approved family day care service;
- v. a family day care educator for an approved family day care service.

Grooming: As defined in the *Professional Standards Canon*, means the cultivation of a relationship in order to:

- (a) initiate or hide sexual assault or abuse;
- (b) facilitate the procurement of a child to engage in a sexual act; or
- (c) expose, without legitimate reason, a child to any indecent matter.

In the case of child sexual abuse, an offender may groom not only the child, but also the child's parents or guardians, colleagues or other persons.

Harm: As defined in section 9 of the *Child Protection Act 1999* and the *Education (Queensland College of Teachers) Act 2005*: Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. Harm can be caused by a single act, omission or circumstance; or a series or combination of acts, omissions or circumstances.

In need of protection: As defined in section 10 of the *Child Protection Act 1999* a child in need of protection is a child who:

- (a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and
- (b) does not have a parent able and willing to protect the child from the harm.

Inappropriate behaviour:

- (a) is **sexual** in nature, including **grooming**, or
- (b) regardless of the nature of the behaviour, where it is reasonable to suspect this behaviour has placed a child or young person at risk of harm, caused harm, or there is a **likelihood of future harm**. For example, this includes behaviour defined as **abuse**.

Information: As defined in Professional Standards Canon, information of whatever nature and from whatever source relating to:

- (a) alleged conduct of a Church Worker wherever or whenever occurring involving sexual harassment or assault, or sexually inappropriate behaviour, grooming or the possession, making or distribution of child exploitation material;
- (b) alleged inappropriate or unreasonable conduct or omission of a Church Worker who had knowledge of (a); or
- (c) an alleged process failure.

Licensed persons: A person ordained to the order of bishop, priest or deacon within the Anglican Church of Australia. These are known as Holy Orders.

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Likelihood of future harm: Relates to harm where it is reasonable to believe it will present later in a person's development. This includes harm that is likely to occur should the alleged inappropriate behaviour of concern continue.

Mandatory Reporter: Pursuant to s 13E of the *Child Protection Act 1999* a mandatory reporter is any of the following:

- (a) a doctor;
- (b) a registered nurse;
- (c) a teacher;
- (d) a police officer who, under a direction given by the commissioner of the police service under the *Police Service Administration Act 1990*, is responsible for reporting under this section;
- (e) a person engaged to perform a child advocate function under the *Public Guardian Act 2014*;
- (f) an early childhood education and care professional.

Nominated Supervisor: Means an individual who is nominated by the Approved Provider of the Service under the *Education and Care Service National Law 2017* to be a Nominated Supervisor of that Service; and who has provided written consent to that nomination.

Parent: Consistent with the *Child Protection Act 1999* and *Working with Children (Risk Management and Screening) Act 2000*, a parent is the child's mother, father or someone else having or exercising parental responsibility for the child, other than on a temporary basis.

Peers: a child or young person of similar age. For example, for a year 10 student, other high school students are their peers.

Principal: Consistent with the *Education (General Provisions) Act 2006*, the person responsible for the school's day-to-day management. Also known as a Head of the School, Headmaster/mistress or other similar title.

Procedures: Means the *Protecting Children and Young People in Anglican Education Guidelines and Procedures*

Policy: Means the *Protecting Children and Young People in Anglican Education Policy*

Reasonable belief: Means believes on grounds that are reasonable in the circumstances.

Reasonable suspicion: Means suspects on grounds that are reasonable in the circumstances.

Registered nurse: Consistent with the *Child Protection Act 1999* means a person registered under the *Health Practitioner Regulation National Law*:

- (a) to practise in the nursing profession, other than as a student; and
- (b) in the registered nurse's division of that profession.

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Responsible Person: Consistent with the definition within section 162 of the Education and Care Service National Law, a Responsible Person includes:

- (a) the approved provider, if the approved provider is an individual or, in any other case, a person with management or control of an education and care service operated by the approved provider;
- (b) a nominated supervisor of the service;
- (c) a person in day-to-day charge of the service.

Safety: the condition of being protected from harm.

Sexual abuse: Sexual abuse is defined in section 364 of the *Education (General Provisions) Act 2006* as including sexual behaviour involving the student and another person, where:

- (a) The other person bribes, coerces, exploits, threatens or is violent toward the student; or
- (b) The student has less power than the other person; or
- (c) There is a significant disparity between the student and the other person in intellectual capacity or maturity.

Serious Incident: A Serious Incident includes:

- the death of a child at the ECS, or following an incident at the ECS
- any incident involving serious injury or trauma to a child where it could be reasonably expected the children required urgent medical attention from a registered medical practitioner, or attend a hospital (e.g. broken limb)
- any incident involving serious illness, where a child ought reasonably to have attended a hospital (e.g. anaphylaxis)
- any emergency for which emergency services attended
- any circumstance where a child appears to be missing or cannot be accounted for
- any circumstance where a child appears to have been taken or removed from the premises in a manner that contravenes Regulations, or
- any circumstance where a child is mistakenly locked in or locked out of the premises or any part of the premises.

Staff: A staff member is a person who is employed by the School or Service.

Student: Consistent with the *Education (General Provisions) Act 2006*, includes a student under 18 years attending the School; a kindergarten age child registered in a kindergarten learning program at the School; or a person with a disability who is being provided with special education at the School.

Student Protection Officers: A person appointed by the Principal under section 10.6 of the Policy. See section 17 of these Procedures for further information.

Teachers: An approved teacher under the *Education (Queensland College of Teachers) Act 2005* employed at a school.

Visitors: Any person visiting the School or Service.

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Volunteers: Consistent with the *Working with Children (Risk Assessment and Screening) Act 2000*, a person undertaking work for a School or Service without receiving financial reward. 'Undertaking work' is understood to mean holding a position or performing a function with the actual or apparent authority of the School or Service.

Working with Children in Anglican Education Policy: As published by the Anglican Schools Commission

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APPENDIX 2: LAW AND CANON

The following is a description of notable law or canon and where it is applied within the *Protecting Children and Young People in Anglican Education Policy*.

Law or Canon	Summary	Most relevant sections of the Policy	Person's responsible
<i>Child Protection Act 1999 and Regulation 2011</i>	<ul style="list-style-type: none"> S13E: Mandatory reporters (teachers, all adult ECS staff, registered nurses) must report a 'reportable suspicion' to Child Safety. A reportable suspicion is a reasonable suspicion a child is in need of protection from sexual or physical abuse. <p>The following information is prescribed in the Regulation for inclusion in the relevant person's report:</p> <ol style="list-style-type: none"> the child's name and sex; the child's age; details of how to contact the child; details of the harm to which the reportable suspicion relates; particulars of the identity of the person suspected of causing the child to have suffered, suffer, or be at risk of suffering, the harm to which the reportable suspicion relates; particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates. <ul style="list-style-type: none"> S13A: Any person may inform the chief executive if the person reasonably suspects: <ol style="list-style-type: none"> a child may be in need of protection; or an unborn child may be in need of protection after he or she is born. 	<p>10.3</p> <p>10.4 (d) and 10.5.3 (d)</p>	<p>Mandatory reporters to Child Safety (e.g. ECS adult staff, teachers, nurses, doctors)</p> <p>Student Protection Officers, Nominated Supervisors and Principals</p>
<i>Civil Liability Act 2003 and Regulation 2014</i>	<ul style="list-style-type: none"> S33D Duty to prevent child abuse: An institution has a duty to take all reasonable steps to prevent the abuse of a child by a person associated with the institution while the child is under the care, supervision, control or authority of the institution. <p>S33E Proof of whether duty was breached:</p>	Assisted by implementation of this Policy	Governing body

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<i>Law or Canon</i>	<i>Summary</i>	<i>Most relevant sections of the Policy</i>	<i>Person's responsible</i>
	<ol style="list-style-type: none"> 1) This section applies if a person associated with an institution abuses a child while the child is under the care, supervision, control or authority of the institution. 2) The institution is taken to have breached its duty under section 33D unless the institution proves it took all reasonable steps to prevent the abuse. 3) In deciding whether the institution took all reasonable steps to prevent the abuse, the matters that are relevant include: <ol style="list-style-type: none"> (a) the nature of the institution; and (b) the resources that were reasonably available to the institution; and (c) the relationship between the institution and the child; and (d) the position in which the institution placed the person in relation to the child, including the extent to which the position gave the person: <ol style="list-style-type: none"> i. authority, power or control over the child; or ii. an ability to achieve intimacy with the child or gain the child's trust. 		
<i>Criminal Code 1899 (Schedule 1)</i>	<ul style="list-style-type: none"> • 229BB makes it an offence for certain persons associated with institutions, including Anglican Schools and Services, to fail to protect a child from child sexual offences in relation to the child. <p>An adult associated with the School or Service (other than a regulated volunteer), commits an offence if:</p> <ol style="list-style-type: none"> (a) the person knows there is a significant risk that another adult (the alleged offender) will commit a child sexual offence in relation to a child; and (b) the alleged offender: <ol style="list-style-type: none"> i. is associated with an institution; or ii. is a regulated volunteer; and (c) the child is under the care, supervision or control of an institution; and (d) the child is either: <ol style="list-style-type: none"> i. under 16 years; or ii. a person with an impairment of the mind; and 	10.1(e) to (i) 10.2 (d) to (e) 10.5.1 (b) 10.5.3 (b) to (c), (e) and (h)	

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Law or Canon	Summary	Most relevant sections of the Policy	Person's responsible
	<p>(e) the person has the power or responsibility to reduce or remove the risk; and</p> <p>(f) the person wilfully or negligently fails to reduce or remove the risk.</p> <ul style="list-style-type: none"> 299BC makes it an offence for any adult in Queensland to fail to report to police information about a child sexual offence. <p>An adult commits the offence if:</p> <p>(a) the 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 against a child by another adult; and</p> <p>(b) at the relevant time, the child is or was:</p> <ol style="list-style-type: none"> under 16 years; or a person with an impairment of the mind. <p>Reasonable excuses for not reporting information to a police officer include, but may not be limited to:</p> <p>(a) the adult believes on reasonable grounds that the information has already been disclosed to a police officer; or</p> <p>(b) the adult has already reported the information under any of the following provisions, or believes on reasonable grounds that another person has done or will do so:</p> <ol style="list-style-type: none"> the <i>Child Protection Act 1999</i>, chapter 2, part 1AA; the <i>Education (General Provisions) Act 2006</i>, chapter 12, part 10; the <i>Youth Justice Act 1992</i>, part 8 or 9; or <p>(c) the adult gains the information after the child becomes an adult (the alleged victim), and the adult reasonably believes the alleged victim does not want the information to be disclosed to a police officer; or</p> <p>(d) both of the following apply:</p> <ol style="list-style-type: none"> the adult reasonably believes disclosing the information to a police officer would endanger the safety of the adult or another person, other than the alleged 	<p>10.1 (c) to (i)</p> <p>10.2 (e)</p> <p>10.5.3 (a) to (c)</p>	<p>All adults</p>

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Law or Canon	Summary	Most relevant sections of the Policy	Person's responsible
	<p>offender, regardless of whether the belief arises because of the fact of the disclosure or the information disclosed;</p> <p>ii. failure to disclose the information to a police officer is a reasonable response in the circumstances.</p>		
<i>Education (Accreditation of Non-State Schools) Act 2017</i>	<ul style="list-style-type: none"> s 176: A person who is, or was, involved in the administration of this Act including, for example, as a public service employee, must not disclose information if the information is about a child and identifies, or is likely to identify, the child. There are a limited number of circumstances in which such information can be disclosed. including where: <ul style="list-style-type: none"> disclosure is in the performance of functions under the Act; a parent or guardian of the child to whom the information relates has given their written consent; the information is otherwise publicly available; disclosure is authorised or permitted under an Act or required by law; or the information is disclosed to a law enforcement agency where the person disclosing the information is reasonably satisfied that disclosure is necessary for the prevention, detection investigation or punishment of a criminal offence or a breach of a law. 	11 12.1	Governing body All staff
<i>Education (Accreditation of Non-State Schools) Regulations 2017</i>	<ul style="list-style-type: none"> S16 (1) A school must have written processes about how the school will respond to harm, or allegations of harm, to students under 18 years; and the appropriate conduct of the school's staff and students. S16 (2) these written processes must include a process for: <ul style="list-style-type: none"> (a) reporting by a student to a stated staff member of the conduct of another staff member that the student considers inappropriate (b) how the information reported to the staff member must be dealt with by that staff member (c) reporting sexual abuse and likely sexual abuse as per the <i>Education (General Provisions) Act 2006</i> sections 366 and 366A, and (d) reporting a reportable suspicion under the <i>Child Protection Act 1999</i>, section 13E 	<p>The policy and these Procedures</p> <p>10.1.(c) to (e) 10.2, 10.3, 10.4, 10.5.3</p>	Governing body

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<i>Law or Canon</i>	<i>Summary</i>	<i>Most relevant sections of the Policy</i>	<i>Person's responsible</i>
	<ul style="list-style-type: none"> S16 (3) for the processes detailed in 16 (2) a, there must be at least 2 stated staff members. S16 (4) requires governing bodies to ensure: <ul style="list-style-type: none"> (a) the school's staff and students, and students' parents and guardians, are made aware of the processes (b) the processes are readily accessible by staff, students, parents and guardians (c) staff are trained annually in implementing the processes (d) the school is implementing the processes S16 (5) The school must have a written complaints procedure to address allegations of non-compliance with the processes (S 16(1)) S16 (6) The complaints procedure may form part of any other written procedure for dealing with complaints. 	<p>10.6 (a)</p> <p>7, 10.1(j), 10.5.1, 10.5.2, 10.8, 10.9 (h) to (i)</p> <p>5, 10.2 (d) alongside the Complaints Management in Anglican Schools Policy and Procedures</p>	<p>Principals</p> <p>Principals, School Councils and governing bodies</p> <p>Governing body</p>
<i>Education and Care Services National Law and Regulations</i>	<ul style="list-style-type: none"> S84 of the Regulation requires that the Approved Provider of an education and care service must ensure that nominated supervisors and staff members at the service who work with children are advised of: <ul style="list-style-type: none"> (a) the existence and application of the current child protection law; and (b) any obligations that they may have under that law. S167 of the Law requires the Approved Provider and Nominated Supervisor/s of an education and care service to ensure that every reasonable precaution is taken to protect the children being educated and cared for by the service, from harm and from any hazard likely to cause injury. Similarly, sections 167, 170, 171 and 172 of the Regulation requires: <ul style="list-style-type: none"> the Service to have policies and procedures in relation to providing a child safe environment, for policies and procedures to be followed and 	<p>Assisted by implementation of the Policy (notably 10.5.1)</p> <p>Assisted by implementation of the Policy</p>	<p>Approved Provider and Nominated Supervisor/s</p>

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<i>Law or Canon</i>	<i>Summary</i>	<i>Most relevant sections of the Policy</i>	<i>Person's responsible</i>
	<ul style="list-style-type: none"> ○ for policies and procedures to be kept available, with changes to policies or procedures notified to parents of children enrolled at the service. • S176 (2) (C) of the Regulation requires Approved Providers to notify the Regulatory Authority (Qld Department of Education), within 7 days, of: <ul style="list-style-type: none"> ○ Any circumstance arising at the service that poses a risk to the health, safety or wellbeing of a child attending the service. ○ Any incident where the Approved Provider reasonably believes that physical abuse or sexual abuse of a child or children has occurred or is occurring, while the child is being educated and cared for by the ECS. ○ Allegations that physical or sexual abuse of a child has occurred or is occurring while the child is being educated and cared for by the ECS. • S12 of the Law and S176 (2) (a) and (b) of the Regulations require the Approved Provider, within 24 hours of becoming aware of the incident or allegation, to notify the Regulatory Authority (Qld Department of Education) of any serious incidents that occur or are alleged to have occurred (complaints). A Serious Incident includes: <ul style="list-style-type: none"> ○ the death of a child at the ECS, or following an incident at the ECS ○ any incident involving serious injury or trauma to a child where it could be reasonably expected the child required urgent medical attention from a registered medical practitioner, or attend a hospital (e.g. broken limb) ○ any incident involving serious illness, where a child ought reasonably to have attended a hospital (e.g. anaphylaxis) ○ any emergency for which emergency services attended ○ any circumstance where a child appears to be missing or cannot be accounted for ○ any circumstance where a child appears to have been taken or removed from the premises in a manner that contravenes Regulations, or ○ any circumstance where a child is mistakenly locked in or locked out of the premises or any part of the premises 	<p>10.1 (c) to (i) 10.7 (b) to (c) 10.9 (d) and Appendix C</p>	<p>All persons, Nominated Supervisor/s and the Approved Provider</p>

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Law or Canon	Summary	Most relevant sections of the Policy	Person's responsible
	<ul style="list-style-type: none"> Note, other notification requirements may apply, for example, breaches or alleged breaches (complaints) of the Education and Care Service National Law such as incidents involving inappropriate supervision or discipline require notification within 24 hours. 		
<i>Education (General Provisions) Act 2006 and Regulation 2017</i>	<ul style="list-style-type: none"> S366 and 366A: all staff must immediately provide a written report to the Principal or a Director of a school's governing body if they reasonably suspect a student has been, is being or is likely to be sexually abused by another person; and the Principal or Director must immediately provide this report to the Police. Also under this section, if the Principal is the 'first person' with the reasonable suspicion, as well as reporting to the Police, they must provide a copy of the report to a Director. S 364: For the purposes of these sections, sexual abuse includes sexual behaviour where: <ul style="list-style-type: none"> another person bribes, coerces, exploits, threatens or is violent toward the student; the student has less power than the other person; there is a significant disparity between the student and the other person in intellectual capacity or maturity. Written reports must include (S68 and 69 of Regulation): <ol style="list-style-type: none"> the name of the person giving the report (the first person); the student's name and sex; details of the basis for the first person becoming aware, or reasonably suspecting, that the student has been, or is likely to be sexually abused, by another person; details of the abuse or suspected abuse; any of the following information of which the first person is aware: <ol style="list-style-type: none"> the student's age; the identity of the person who has sexually abused, or is suspected to have sexually abused, the student; the identity of anyone else who may have information about the abuse or suspected abuse. 	10.2 (e), 10.5.3 (b), 10.9 (c)	All staff, the Principal, any Director (or delegate)

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<i>Law or Canon</i>	<i>Summary</i>	<i>Most relevant sections of the Policy</i>	<i>Person's responsible</i>
	<ul style="list-style-type: none"> S366B details that the Directors' functions of receiving a report and giving a copy of the report to a police officer under section 366 or 366A, by unanimous resolution, can be delegated to an appropriately qualified individual. This individual cannot be the Principal or any other staff member of the School. 	10.9 (c) and Appendix C	Governing body and delegate
<i>Education Services for Overseas Students Act 2000 (Cth)</i>	<p>Requires Schools (Registered Providers) to comply with the National Code of Practice for Providers of Education and Training to Overseas Students: Standard 5, specifically the welfare requirements for younger overseas students (under the age of 18 years). Relevant to this Policy, this includes that all registered providers who enrol overseas students under the age of 18 must meet certain obligations. They must:</p> <ul style="list-style-type: none"> (a) meet Commonwealth, state or territory legal requirements relating to child welfare and protection; and (b) give younger overseas students important age and culturally appropriate safety information, including what to do and who to contact in an emergency, and how to report any incident or allegation of sexual, physical or other abuse. 	<p>Assisted by implementation of the Policy</p> <p>10.5.1 (e)</p>	Principal
<i>Education (Queensland College of Teachers) Act 2005 and Regulation 2016</i>	<p>Schools (employing authorities) are obliged to inform the Queensland College of Teachers (QCT) about particular allegations:</p> <ul style="list-style-type: none"> S76: Schools (employing authorities) are required to notify QCT as soon as possible, after starting to deal with an allegation of harm or likely harm to a child due to the teacher's conduct. S77: Schools (employing authorities) are required to notify QCT of the outcome (after dealing with an allegation). S78: Schools (employing authorities) are required to notify QCT within 14 days if the school has dismissed a teacher in circumstances that call the teacher's competence to be employed as a teacher into question (regardless of reporting under 76 or 77). 	10.5.3 (g)	Principal

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<i>Law or Canon</i>	<i>Summary</i>	<i>Most relevant sections of the Policy</i>	<i>Person's responsible</i>
	Under this legislation, QCT also have powers regarding information sharing and any complaints or investigations relevant to a teacher's competence and schools have responsibilities associated with assisting their management of such.		
Professional Standards Canon and the ACSQ Protocol for Responding to Child Sexual Abuse and Sexual Misconduct	Staff and volunteers in Schools or Services owned or controlled by the ACSQ meet the definition of Church Worker and as such are required to inform a Responsible Person or the Office of Professional Standards, of any information regarding child sexual abuse. The Responsible Person is then required to report the matter to the Office of Professional Standards.	10.1 (c) to (i), 10.2 (e), 10.5.3 (e) 10.9 (e) to (f) and appendix C	All staff and volunteers in Schools or Services governed or controlled by the ACSQ, and the Principal or Nominated Supervisor (as a Responsible Person).
Safe Ministry to Children Canon	Staff and volunteers in Schools or Services owned or controlled by the ACSQ meet the definition of Church Worker and as such are required to comply with the Our Commitment: Creating an environment for children and young people to thrive – Code of Conduct for Anglican Schools and Education & Care Services.	8.1 (b), 10.5.1 (a)	All staff and volunteers in Schools or Services governed or controlled by the ACSQ
<i>Work, Health and Safety Act and Regulation 2011</i>	1. Schools and ECSs are responsible for ensuring, so far as reasonably practicable, that the health and safety of children and young people is not put at risk by their attendance or enrolment at the school/ECS, or from attending an activity directly associated with their enrolment or attendance at the school/ECS. 2. Schools and ECSs are responsible for providing information, training, instruction, and supervision necessary to protect children and young people from risks to their health and safety resulting from their attendance or enrolment at the school/ECS, or from attending an activity directly associated with their enrolment or attendance at the school/ECS.	Assisted by implementation of the Policy 10	Governing body Principal and Nominated Supervisor/s

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<i>Law or Canon</i>	<i>Summary</i>	<i>Most relevant sections of the Policy</i>	<i>Person's responsible</i>
<i>Working with Children (Risk Management and Screening) Act 2000 and Regulation 2020</i>	<ul style="list-style-type: none"> Requires all regulated businesses, as part of their risk management strategy to have policies and procedures for handling disclosures or suspicions of harm to children, including reporting guidelines. Note this strategy is required to be reviewed on an annual basis (refer to Working with Children in Anglican Education Policy). Relatedly, regulated businesses are also required to provide communication and support for implementing the risk management strategy, including: <ul style="list-style-type: none"> written information about the risk management strategy for, and where the strategy may be accessed by: <ul style="list-style-type: none"> persons employed or otherwise engaged by the responsible person for the risk management strategy children, or parents of children, who receive a service or take part in an activity associated with the regulated employment or regulated business to which the risk management strategy relates training materials for persons employed or otherwise engaged by the responsible person for the risk management strategy: <ul style="list-style-type: none"> to help identify risks of harm to children to help handle disclosures or suspicions of harm to children about matters included in the risk management strategy. 	The Policy	Principals, Approved Providers and governing bodies

Appendix 4

Working with Children in Anglican Education

(incl. Advice on Screening Requirements)



Working with Children in Anglican Education

Guidelines and Procedures

Supporting document for the:
Working with Children in Anglican Education
Policy



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1. Introduction

These Guidelines and Procedures are provided to support the application of the [Working with Children in Anglican Education Policy](#) (the Policy) within the operation of Anglican Schools and Education & Care Services (Services or ECS). The Policy should be read alongside this document.

Implementing the Policy along with these supporting Guidelines and Procedures, helps Schools and Services create safe and nurturing environments through encouraging a child safe culture, adopting strategies and acting to promote the wellbeing of, and identify and mitigate this risk of harm to, children and young people.

This document is published by the Anglican Schools Commission. This is version 1.0, published in August 2020. See section 12: Version Control for further information.

Principles

Where specific guidance is not provided on a matter, decision making and actions are to be informed by relevant drivers (as discussed throughout these guidelines) and the statement of commitment (section 3), together with the following principles:

- *Understanding that a proactive approach to safety and wellbeing is important in assisting children reach their potential as they develop their character and progress towards adulthood.*
- *Applying a holistic and considered understanding to the safety and wellbeing of children, using contemporary, evidence-based knowledge and resources to inform our continuous improvement.*
- *Applying good sense and sound judgement in practical matters.*
- *Working respectfully and in partnership to achieve the best available outcomes for children, strengthening networks to increase safety and support across our communities.*
- *Operating by Gospel Values, emphasising service, inclusivity, integrity, courage, justice, and generosity of spirit.*

Overarching Drivers

The following overarching drivers reflect relevant responsibilities of Anglican Schools and Services to provide a safe environment for children and young people.

These drivers are always to be considered across child and youth risk management.

Topic specific drivers are discussed throughout these Guidelines in the relevant section.

Work, Health and Safety Act 2011

- Requires Schools and Services to ensure, so far as reasonably practicable, that the health and safety of children and young people are not at risk.
- Requires Schools and Services to provide any information, training, instruction or supervision necessary to protect children and young people from risks to their health and safety.
- Risks relate to those resulting from their attendance or enrolment at the School or Service, or from attending an activity directly associated with their enrolment or attendance at the School or Service.

Civil Liability Act 2003

Instils a School or Service's "duty to take all reasonable steps to prevent abuse of a child while the child is under the care, supervision, control or authority of the institution." The School or Service will be taken to have breached this duty "unless the institution proves it took all reasonable steps to prevent the abuse." Abuse relates to sexual abuse, serious physical abuse and psychological abuse perpetrated in connection to the sexual or serious physical abuse, of a child.

Working with Children (Risk Management and Screening) Act 2000

Requires each regulated business or employer of those defined as being in regulated employment to develop and implement a written strategy (or strategies) that:

- implements employment practices and procedures to promote the wellbeing of children affected by the business or employment and to protect the child from harm;
 - are reviewed annually; and
 - includes prescribed matters.
-

Education (Accreditation of Non-State Schools) Act and Regulations 2017

- Requires compliance with the *Work, Health and Safety Act 2011* and the *Working with Children (Risk Management and Screening) Act 2000* as a condition of accreditation.
 - Requires development and implementation of written processes for the conduct of staff and students, and response to harm, as a condition of accreditation.
-

The National Code of Practice for Providers of Education and Training to Overseas Students 2018

- Compliance with the National Code is required for a School to maintain registration to provide education services to overseas students as per the *Education (Overseas Students) Act 2018*.
 - All registered providers who enrol overseas students under the age of 18 must meet certain obligations regarding student safety. Registered providers taking responsibility for the welfare of overseas students under the age of 18 must ensure that the overseas student is in living arrangements which are safe and adequately meet their needs; and take all practical steps to ensure their welfare is always maintained.
-

Education and Care Services National Law and Regulations 2011

- This legislation requires an approved provider and nominated supervisor/s of an education and care service ensure that every reasonable precaution is taken to protect children being educated and cared for by the service, from harm and from any hazard likely to cause injury.
 - This legislation requires an education and care service to implement policies and procedures in relation to providing a child safe environment.
-

National Quality Standard (for Education and Care Services)

The [National Quality Standard](#) (NQS) sets a high national benchmark for early childhood education and care and outside school hours care services in Australia. The NQS includes seven quality areas that are important outcomes for children. Services are assessed and rated by their regulatory authority against the NQS, and given a rating for each of the seven quality areas and an overall rating based on these results.

National Principles for a Child Safe Organisation

In 2019, the Council of Australian Governments (COAG) endorsed the [National Principles for Child Safe Organisations](#). These principles are evidence based and their application seeks to provide a nationally consistent approach to embedding child safe cultures within organisations that engage with children, and act as a vehicle to give effect to the Royal Commission into Institutional Responses to Child Sexual Abuse recommendations related to child safe standards.

In 2019, the National Office of Child Safety (Department of Prime Minister and Cabinet) also published the [Commonwealth Child Safe Framework](#). This Framework recommends Commonwealth entities impose child safety requirements (including the National Principles, risk management, compliance and training) on any organisation they fund to provide services directly to children, or for activities that involve contact with children that is a usual part of, and more than incidental to, the funded activity.

How to use these guidelines and procedures

Sections 2 to 10 of these Guidelines each focus on mandatory requirements within Child and Youth Risk Management Strategies (CYRMS).

To create a more logical flow, these are not in the same order as listed in the Regulations (for example, given their overarching application across the CYRMS, both 'Communication and Support', 'Managing Breaches' are discussed earlier and then integrated where relevant into each subsequent section). See section 2 for further information.

Sections 2 and 8 provide procedures specific to supporting compliance with the *Working with Children (Risk Management and Screening) Act 2000*, as required by section 3 of the *Working with Children (Risk Management and Screening) Regulations 2011*.

Sections 2 to 10 of the Guidelines/Procedures:

- Describes specific **requirements** from the *Working with Children (Risk Management and Screening) Act* and *Regulations* to be met as relevant to that section
- Lists related requirements to also be reflected within a CYRMS, providing an overview of each in **other key drivers**
- Lists **tools**, as well as **related policies, procedures, resources** and **other sources of information**
- Details best practice **outcomes sought** to be achieved, relevant to that section, as described in the National Principles for a Child Safe Organisation and the Human Rights Convention on the Rights of a Child
- Suggests areas of **reflection** and critical analysis, for Schools and Services to consider, comparing their CYRMS to the requirements and best practice approaches, such as those described in the National Principles for Child Safe Organisations.

2. Procedures for implementing and reviewing Child and Youth Risk Management Strategies

Requirements

Known as a Child and Youth Risk Management Strategy (CYRMS), as per sections 171 and 172 of the *Working with Children (Risk Management and Screening) Act 2000* (the Act), Anglican Schools and Education & Care Services (Services) are required to develop and implement a written strategy or strategies. *These Strategies are to detail the employment practices and procedures implemented to promote the wellbeing of children affected by each type of regulated business and regulated employment provided by the School or Service, and to protect children from harm.*

These Strategies are an opportunity for Schools and Services to detail a proactive, consistent and logical framework that outlines how activities work together to create a safe and supportive environment for children and young people.

Anglican Schools may operate multiple regulated businesses as part of the services they provide. Common categories of regulated businesses, for example, include:

- Non-State schools
- Education and care services
- Child accommodation services, including Home Stay

Schools and Services may also engage several people in various categories of regulated employment, for example:

- Schools – boarding facilities
- Schools – employees other than teachers and parents
- Education and care services
- Child accommodation services including home stay
- Churches, clubs or associations involving children

*All regulated businesses and people who are engaged in regulated employment by the School or Service **must** be adequately reflected within one or more CYRMS within the School or Service. Each CYRMS should explicitly state the types of regulated employment and regulated business that the strategy applies to.*

*Note employment includes **any work**, e.g. volunteer/unpaid, paid, full time, part time, casual, individual contract, by formal or informal (such as verbal) arrangement.*

Outcomes sought...

National Principles for a Child Safe Organisation:

9: Implementation of the national child safe principles is regularly reviewed and improved.

10. Policies and Procedures document how the organisation is safe for children and young people.

United Nations Convention on the Rights of the Child:

Article 29: Children's education should help them use and develop their talents and abilities. It should also help them learn to live peacefully, protect the environment and respect other people.

Article 4: Organisations have a responsibility to ensure children's rights are protected. They can help families to protect children's rights and create an environment where children can grow and reach their potential.

Schools or Services often engage other businesses to provide services to children and young people enrolled or provide permission for another business to use the School or Service facilities to deliver their business. Where this occurs, a risk assessment as to the safety of this arrangement for children and young people, is always to be considered in the decision making (*also see section 9 of these Guidelines*). Where this business is *a regulated business*, or employs people in *regulated employment*, they are required to comply with the *Working with Children (Risk Management and Screening) Act 2000* and must therefore have a CYRMS. The quality of this Strategy should be considered by the School or Service as part of the decision to engage with this business and assess any risk this arrangement may pose. Common examples include:

- Private teaching, coaching or tutoring
- Emergency services cadet program
- Sport and active recreation
- Churches, clubs or associations involving children

SUPPORTING TOOLS:

LINK TO APPENDICES:

APPENDIX 2: RECOMMENDED **TEMPLATE FOR CYRMS**. THIS INCLUDES A TEMPLATE FOR AN **ACTION PLAN**

APPENDIX 3: RECOMMENDED **TEMPLATE FOR A TERMS OF REFERENCE** FOR THE CYRM COMMITTEE.

APPENDIX 4: RECOMMENDED **TEMPLATE FOR QUARTERLY REPORTING** BY THE CYRM COMMITTEE.

APPENDIX 5: RECOMMENDED **CHECKLIST FOR ANNUAL REVIEW** OF THE CYRMS.

APPENDIX 6: A TEMPLATE FOR **ANNUAL REPORT** BY HEAD OR NOMINATED SUPERVISOR. (PENDING CONSULTATION FOR 2021 IMPLEMENTATION)

QUEENSLAND GOVERNMENT CYRMS RESOURCES:

INFORMATION CAN BE DIRECTLY SOURCED FROM THE ***WORKING WITH CHILDREN (RISK MANAGEMENT AND SCREENING) ACT 2000***. FOR EXAMPLE, CATEGORIES OF REGULATED EMPLOYMENT AND BUSINESSES ARE DETAILED IN SCHEDULE 1.

<https://www.legislation.qld.gov.au/browse/inforce>

OTHER CYRMS RESOURCES ARE AVAILABLE ON THE QUEENSLAND GOVERNMENT, BLUE CARD SERVICES WEBSITE.

<https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/organisations/compliance/risk-management-strategies-resources>

a) Child and Youth Risk Management Committees

Child and Youth Risk Management Committees assist in:

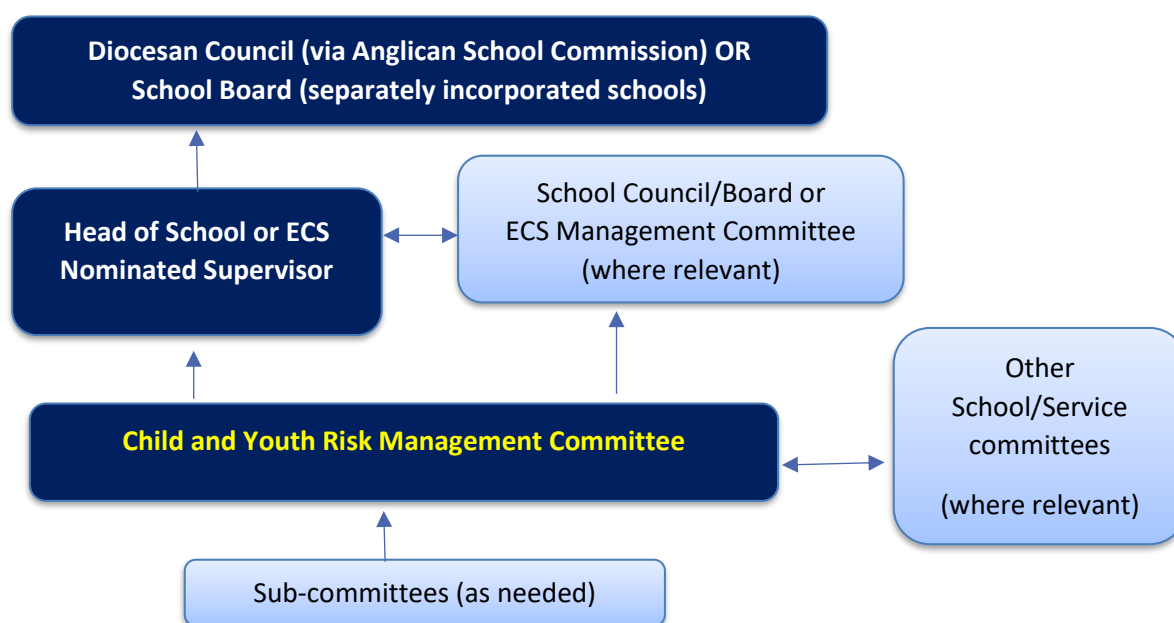
- the implementation of the Working with Children in Anglican Education Policy into School and Education & Care Service operations;
- the application of these Guidelines and Procedures; and
- the development, implementation and review of Child and Youth Risk Management Strategies.

In Schools, the Head of School is responsible for establishing a Child and Youth Risk Management Committee.

In Education & Care Services, the Nominated Supervisor is responsible for establishing the Child and Youth Risk Management Committee. Where a Service is co-located within a School, to support cohesive and effective service delivery, the Nominated Supervisor may use the School's Child and Youth Risk Management Committee, when satisfied this committee can meet the needs of the Service.

Note: Committees may have an alternative name (e.g. Student Safety and Wellbeing Committee), however the requirements continue to apply.

Governance model/ reporting process



Membership

This Committee is to have membership that represent the variety of contexts that the Child and Youth Risk Management Strategy relates and facilitate collaboration with a range of stakeholders from within these contexts, including children, young people, parents, staff and volunteers.

The role of Chairperson, Secretariat and Members are each to be assigned and their responsibilities described in the Committee's Terms of Reference.

Schools and Services are responsible for making the decision about appropriate members and their specific roles based on the structure of their School or Service and the purpose/outcomes of the CYRMS. It is suggested that consideration is given to the following roles as members, noting both the varying structures of Schools and Services, and that people may attend to represent more than one role.

Suggested members	
Senior leadership member (Chairperson)	Dean of Students
Head of each respective school (e.g. Junior / Middle / Senior)	Two Student Protection Officer/s
Director or Nominated Supervisor of ECS	School Counsellor/s and/or Chaplain
Cyber Safety Champion	Position/s responsible for co-curricular activities such as sport or performing arts
Head of Boarding	ECS Responsible Persons (at least one/ECS)
Home Stay Registrar/Coordinator	School Council/Board member or ECS Management Committee member
Risk Management and Compliance Officer	Volunteer parents (consider breadth)
Human Resources Manager	Student representatives (schools)
Blue Card Register Coordinator	Critical Friend (see below)

Roles

Chairperson: Responsible for leading the committee, including ensuring appropriate reporting.

Secretariat: Provides administration support required for the committee to operate effectively, including ensuring recording requirements are met.

Member: Relevant to each member's respective role, to be described in each CYRM Committee's Terms of Reference. Note, members may:

- participate in some or all meetings (where meetings are the most appropriate mechanism)
- achieve their work through another mechanism, such as emails or Microsoft Teams site
- be allocated stakeholders, or other members, that they are responsible for working/consulting with as relevant to the business of the committee
- consult/ provide advice to the committee through another member (e.g. parent or student representatives providing information through a Head of Primary)

Critical friend (Optional): A trusted person, independent of the School or Service, who, as part of the Terms of Reference, agrees to confidentiality and is focused on providing constructive, independent feedback to inform the work of the committee. For example, a graduate of the School, a local academic or a representative from a local community service provider.

Terms of Reference

Each Committee is to have a written Terms of Reference that is provided to each member. See suggested template (appendix 3).

Reporting

Commencing from January 2021, the Chair is responsible for ensuring the Committee, at minimum on a *quarterly* basis, provide a briefing through written reports to:

- For Schools: Head of School and School Council;
- For Education & Care Services: Nominated Supervisors and Management Committee.

See suggested template for recommended reporting content (appendix 4). Note: Consider the contents of this report carefully. Any sensitive information should be only provided to those delegated/ appropriate to receive such information. For example, it may not be appropriate for all members of the CYRM Committee to receive a complete copy of this report. *This reporting is intended to be ISSUES BASED and focused on the needs of those receiving the report, based on their delegated responsibility to lead and govern in a way that develops and maintains a child safe culture.*

Also commencing from 2021, *the Chair is also responsible for supporting the Head or Nominated Supervisor provide an annual report to their governing body*. See appendix 6 for the required template (PENDING). This is required for all owned and subsidiary Anglican Schools and all Services where the Diocese is the Approved Provider (to be provided to the ASC for reporting to Diocesan Council). For other Schools and Services, it is recommended to be provided to respective governing bodies.

Meetings and administration of the committee

Meeting frequency is at the discretion of each School or Service. Meetings, or parts of meetings, may include all or only some members. Schools or Services may also choose alternative ways of consultation and working together as a committee, such as emails or through a Microsoft Teams Site.

Committee records including records of meetings, such as attendees and decisions made, are also to be kept as per approved records retention processes. Best practice is for records to be available for review by relevant members before finalising.

b) Action planning

A strategy is intended to be a forward-facing plan of action, designed to achieve outcomes. As such, it is useful to include an Action Plan within a CYRMS. Quality plans will sufficiently:

- detail the intended action,
- detail the allocation of responsibility for the action,
- identify an intended timeframe for completion, and
- include planning to monitor the completion of actions.

The Policy states that *at minimum, each quarter*, the CYRMS is monitored by the Child and Youth Risk Management Committee, and the Committee reports (for Schools) to Head of School and School Council, or (for Services) to Nominated Supervisors and Management Committees. It is recommended this monitoring and reporting includes analysing progress of and updating the Action Plan.

At any time, new actions can be developed as part of the Committee's work and, at the relevant time, actions yet to be completed can be integrated into the following year's CYRMS. This process can support the timely identification and management of matters and inform the annual review process. *Accepted recommendations from Child Safety Audits, or other key reviews (such as Non-State School Accreditation or those associated with CRICOS approval) should be added into this Action Plan for monitoring and reporting purposes*.

See Appendix 4: a recommended *template for quarterly reporting* by the CYRM Committee.

c) Approval

Schools

For Anglican Schools who are owned by or subsidiary of ACSQ, the Diocesan Council is the governing body. Diocesan Council delegates implementation of the [*Working with Children in Anglican Education Policy*](#) to:

- The Head of each Anglican School. Specifically, the Head of School (Principal) is responsible for meeting the obligations associated with regulated employment undertaken by a person engaged by the School or any regulated businesses owned or controlled by the School. This includes **approving** the Child and Youth Risk Management Strategy/Strategies.
- The School Council, who are responsible for supporting the Head of School to meet these obligations, including **endorsing** the Child and Youth Risk Management Strategy/Strategies.

- The Anglican Schools Commission, who are responsible for providing stewardship and support to implement this Policy. This includes providing oversight in the management of matters relating to breaches in legislation.

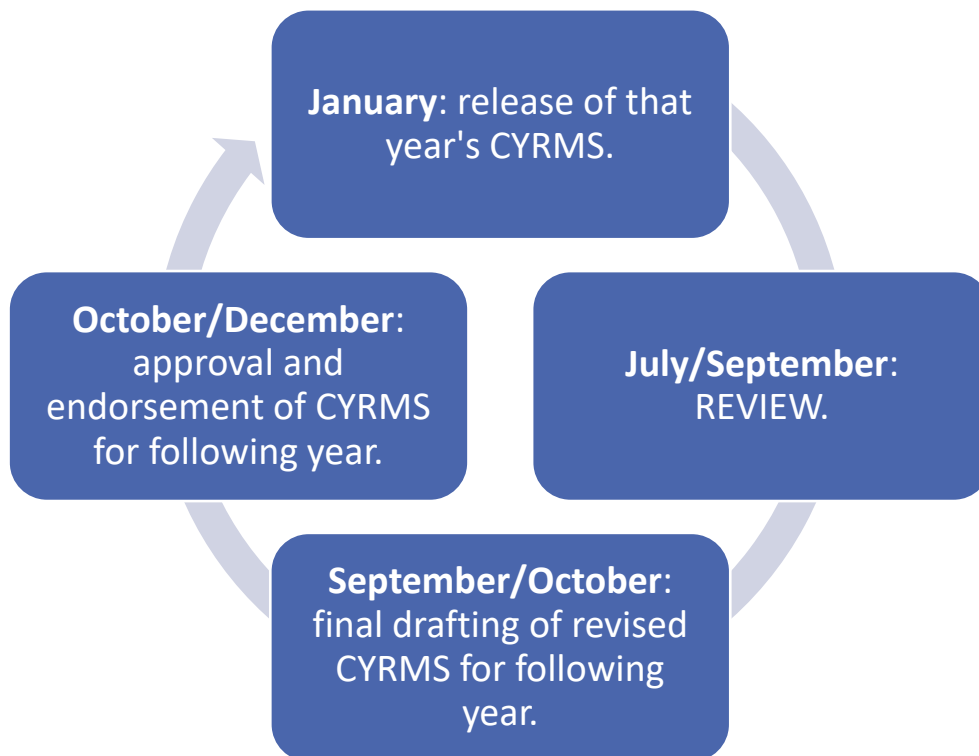
Education & Care Services

Where ACSQ is the Approved Provider of the Service, delegation for the implementation of the [*Working with Children in Anglican Education Policy*](#) is made to:

- The Nominated Supervisor/s of the Service. Specifically, a Nominated Supervisor is responsible for meeting the obligations associated with:
 - the Service as a regulated business and
 - regulated employment undertaken by a person engaged by the Service.
 This includes **developing** the Child and Youth Risk Management Strategy.
- The Executive Director, Anglican Schools Commission, who is responsible for **approving** the Child and Youth Risk Management Strategy.
- The Management Committee of the Service, who are responsible for supporting the Nominated Supervisors to meet their obligations and for **endorsing** the Child and Youth Risk Management Strategy.
- The Anglican Schools Commission, who are responsible for providing stewardship and support to implement this Policy. This includes providing oversight in the management of matters relating to breaches in legislation.

d) Annual review

The *Working with Children (Risk Management and Screening) Act 2000* states these strategies **must** be reviewed annually. A suggested lifecycle is:



See Appendix 5: a **checklist for annual review** of the CYRMS.

e) Prescribed matters for Child and Youth Risk Management Strategies

As per section 3 of the *Working with Children (Risk Management and Screening) Regulation 2011*, every CYRMS **must** include the following prescribed matters. Each are discussed in detail within these Guidelines.

Prescribed Matter	Section of these Guidelines
1. A statement of commitment to the safety and wellbeing of children and the protection of children from harm	3
2. A code of conduct for interacting with children	6
3. Procedures for recruiting, selecting, training and managing persons engaged or proposed to be engaged by the School or Service, as the procedures relate to the safety and wellbeing of children and the protection of children from harm	7
4. Policies and procedures for handling disclosures or suspicions of harm , including reporting guidelines	10
5. A plan for managing breaches of the risk management strategy.	4 And integrated within each relevant section.
6. Policies and procedures for compliance with the Act	Integrated within all relevant sections.
6. Policies and procedures for compliance with the Act, including: a) implementing and reviewing the risk management strategy	2
6. Policies and procedures for compliance with the Act, including: b) keeping a written record of matters under the Act, relating to each person engaged by the School or Service , for example: i. whether or not the School or Service considers the person must apply for a prescribed notice or exemption notice ii. whether or not a prescribed notice application or exemption notice application has been made iii. if a positive notice has been issued, the date of expiry of the notice	8
7. Risk management plans for high risk activities and special events	9
8. Strategies for communication and support	5 And integrated within each relevant section.
8. Strategies for communication and support , including: a) written information for parents and persons engaged by the School or Service that includes details of the risk management strategy or where the strategy can be accessed .	5
8. Strategies for communication and support, including: a) training materials for persons engaged by the School or Service to: i. help identify risks of harm and how to handle disclosures or suspicions of harm; ii. outline the risk management strategy.	7 And integrated within each relevant section.

Reflection: CYRMS

1. Is your CYRMS comprehensive? These Guidelines and the National Principles for a Child Safe Organisation can be used as a point of reference.
2. Is your CYRMS, and related documents easy to understand and accessible? Think about the language and format used.
3. Does the Strategy and how it is developed and implemented reflect:
 - a. a 'best practice' approach? Is the focus on achieving relevant outcomes in addition to meeting requirements?
 - b. that leadership champions and models compliance and participation?
 - c. that all relevant people know about and use applicable policies and procedures?
4. Is the CYRMS reviewed in a meaningful way? Does the review process:
 - a. identify what is done well, as well as areas for improvement?
 - b. include collaboration by CYRM Committee members, and consider consultation with/ feedback from other relevant stakeholders? Is the membership of the CYRM Committee effective?
 - c. demonstrate a continuous improvement approach, where actions are planned and implemented?
 - d. include reflection, assessment or audit of performance across all areas of regulated business and employment? If areas of practice are not reflective of, or not consistent with, child safe practices, are actions to address this developed and implemented?
 - e. include the analysis of complaints, concerns and safety incidents to identify causes and systemic issues? If any issues identified are they incorporated into actions and reflected in the CYRMS?
 - f. consider feedback from children and young people, their families and other stakeholders? Does this feedback show awareness of and confidence in the School or Service's child safe practices? What child safe indicators are reflected in this feedback? What risk areas are reflected?
 - g. consider feedback from leaders, staff and volunteers? Does this feedback show a high level of understanding of child safe requirements and practices within the School or Service? What child safe indicators are reflected in this feedback? What risk areas are reflected?
5. Does the School or Service actively engage with the Anglican Schools Commission (ASC), particularly in the review of policies and procedures? Is there relevant feedback to provide to the ASC?
6. For Services particularly, consider how Quality Area 7, governance and leadership, applies.

3. Statement of Commitment

Requirements

The intent of the Statement of Commitment is to reflect and influence culture. Whilst ACSQ details, within the [*Working with Children in Anglican Education Policy*](#), a Statement of Commitment, each CYRMS is to reflect how the Statement of Commitment is implemented, or will be implemented, in the operations of the School or Service; and how this implementation can be evidenced.

As detailed in the *Working with Children in Anglican Education Policy*, the following Statement of Commitment seeks to provide a foundation to reflect, encourage and support a child safe culture.

The Statement is expected to be proactively implemented by all persons within an Anglican School or Education and Care Service.

Anglican Schools and Education & Care Services are committed to providing environments where children and young people receive the highest standard of care, where their rights are supported, and they have the opportunity to thrive and be fruitful. Such environments nurture and safeguard the intelligence, dignity, safety and wellbeing of each child or young person, by placing them at the centre of thought, values and actions.

As reflected in our Ethos, our vocation is education, driven by a vision of humanity, shaped by the image of God made visible in Jesus, present in every human being.

- *Every child: made in the image and likeness of God.*
- *Every child: loveable and loved, unique and unrepeatable.*
- *Outstanding education for the flourishing of people and the good of community.*

Our faith is lived. We are hospitable and welcoming communities, who embody compassion, kindness, fairness, justice and love, and where exceptional pastoral care is practised.

Working and serving the best interests of children and young people is in everyone's best interest. This is achieved through sustaining living and learning environments that are safe, supportive and stimulating. Specifically, we:

- *place emphasis on genuine engagement with children and young people;*
- *create conditions that reduce the likelihood of harm to children and young people;*
- *create conditions that increase the likelihood of identifying harm; and*
- *respond to any concerns, disclosures, allegations or suspicions.*

This commitment is sought to be consistently reflected through the decisions and behaviour of all persons within the School or Service, who are guided by effective governance, policies, tools and processes. This fosters a child safe culture, where acting in children and young people's best interests is at the heart of what we do.

Outcomes sought...

National Principles for a Child Safe Organisation:

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

United Nations Convention on the Rights of the Child:

Article 3: All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children.

Reflection: statement of commitment

Consider how the School or Service does, or can better:

- Publicly communicate its commitment to child safety
- Champion a child safe culture and model this culture at all levels. For example, how is the School or Service friendly and welcoming for children and young people?
- Use governance arrangements to facilitate the implementation of the CYRMS and associated policy and documents

For Services particularly, consider how Quality Area 7, governance and leadership, applies.

Managing breaches

Consider and reflect how people within the School or Service are held to account for upholding this Statement. How is this prioritised and managed?

Communication and support

What activities does, or can, the School or Service participate in, that reflects this Statement in action? For example:

- displaying the Statement of Commitment in prominent places where everyone (staff, children and young people, parents and visitors) can be reminded of this specific commitment
- detail the Statement of Commitment in other key documents, such as duty statements/job descriptions, performance agreements and review processes
- written reporting, monitoring, reflection and analysis of the CYRMS at School Council/Management Committee meetings
- promote child safety through activities to mark Child Protection Week or Children's Week

Consider diversity. How does, or can:

- Council members, employees and volunteers champion attitudes and behaviours that respect the human rights of all children and young people, and are inclusive, well informed and responsive to diverse needs
- Council members, staff and volunteers reflect on how discrimination and exclusion, whether intentional or unintentional, may work against a safe and inclusive culture and develop proactive strategies to address this
- The School or Service reflect on ways in which the physical environment might promote cultural safety

4. A plan for managing breaches of the risk management strategy

Requirements

Each CRYMS **must** reflect a plan to manage any action or inaction by a person within the School or Service that fails to comply with the policies, procedures and planning detailed within the CYRMS.

It is recognised that there may be different approaches to managing a breach based on the relevant matter. Given this, managing breaches related to particular topics within the CYRMS are discussed in each relevant section of these Guidelines, and the sample template for the CYRMS (appendix 2) integrates managing breaches into each relevant section.

Broader than this, the approval, endorsement, reporting and monitoring of the CYRMS, including the Action Plan, act together as a plan to provide assurance that the CYRMS is being implemented.

Any changes to the approved Action Plan, including failure to deliver on intended actions within agreed timeframes, are to be detailed by the CYRM Committee in their quarterly reporting. Heads and School Councils, or Nominated Supervisors and Management Committees, are to consider these changes and take appropriate action. Where failure to deliver on intended actions indicates a performance issue of individual/s, it is to be managed as such, using approved performance management processes.

For Schools or Services owned/controlled by the ACSQ: serious matters are to be briefed in writing to the Executive Director, Anglican Schools Commission as soon as practicable. This briefing will be undertaken by either the Head or Nominated Supervisor and will include the Chair of School Council/Management Committee in this correspondence.

Serious matters include but are not limited to those that indicate a breach of law, or create a post mitigation, high (or greater) level of risk within the School or Service.

5. Communication and Support

Requirements

Each CRYMS is required to reflect strategies for communication and support to relevant stakeholders.

It is recognised that there may be different approaches to communication and support based on the relevant matter. Given this, approaches related to particular topics within the CYRMS are discussed in each relevant section of these Guidelines, and the sample template for the CYRMS (appendix 2) integrates communication and support into each relevant section.

These strategies **must** include:

- written information for parents and persons engaged by the school that includes details of the risk management strategy or where the strategy can be accessed; and
- training materials for persons engaged by the school to:
 - i. help identify risks of harm and how to handle disclosures or suspicions of harm; and
 - ii. outline the risk management strategy(also see section 9 of these Guidelines)

Other key drivers:

Education (Accreditation of Non-State Schools) Regulation 2017

- Requires the School's governing body to ensure:
 - (a) the school's staff and students, and students' parents and guardians, are made aware of the processes for the conduct of staff and students, and response to harm
 - (b) the processes are readily accessible by staff, students, parents and guardians
 - (c) staff are trained annually in implementing the processes
 - (d) the school is implementing the processes
-

The National Code of Practice for Providers of Education and Training to Overseas Students 2018

- Requires Schools to provide overseas students with important age and culturally appropriate safety information, including what to do and who to contact in an emergency, and how to report any incident or allegation of sexual, physical or other abuse.
-

Education and Care Services National Law and Regulations 2011

- Requires approved providers to ensure nominated supervisors and staff members at the service who work with children are advised of:
 - the existence and application of the current child protection law; and
 - any obligations that they may have under that law.
 - Requires the ECS to have policies and procedures in relation to providing a child safe environment, policies and procedures are to be followed, kept available, and changes to policies or procedures are to be notified to parents of children enrolled at the service.
-

National Principles for Child Safe Organisations

- Indicators of Principle 1 (Child safety and wellbeing is embedded in organisational leadership, governance and culture) being applied includes:
 - The organisation can demonstrate they have **publicly available**, current documents such as a child safety and wellbeing policy, practice guidance, information sharing protocols, staff and volunteer codes of conduct and risk management strategies

- Leaders promote sharing good practice and learnings about child safety and wellbeing
- Staff, volunteers, children and young people have a sound knowledge of children's rights, including their rights to feel safe and be heard, and the accountabilities that accompany these rights
- In addition to these, Principles 2, 3 and 4 are discussed below.

Communicating with children, young people, families and community

Consider contemporary best practice regarding the involvement of children and young people, their families and community in creating safe environments.

Outcomes sought...

National Principles for a Child Safe Organisation:

2: Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously

3. Families and communities are informed, and involved in promoting child safety and wellbeing

4. Equity is upheld, and diverse needs respected in policy and practice.

United Nations Convention on the Rights of the Child:

Article 12: Children have the right to give their opinion, and for adults to listen and take it seriously.

Article 5: Families have the responsibility to help children learn to exercise their rights and to ensure that their rights are protected.

Article 2: All children have rights, no matter who they are, where they live, what their parents do, what language they speak, what their religion is, their sex or gender, what their culture is, whether they have a disability, whether they are rich or poor.

SUGGESTED READING

SHIER'S PATHWAY TO PARTICIPATION: <http://myd.govt.nz/documents/engagement/shier.pdf>

Shier, H (2001). Pathways to Participation: Openings, Opportunities and Obligations. *Children & Society*, 15: 107-117. DOI: 10.1002/CHI.617

STUDENT WELLBEING HUB: STUDENT VOICE

<https://studentwellbeinghub.edu.au/educators/framework/>

PROTECTIVE BEHAVIOUR & RESPECTFUL RELATIONSHIPS RESOURCE EXAMPLES

- THE TRUE ALL SCHOOL PROGRAM (QLD): <https://www.true.org.au/Education/allschool>
- DANIEL MORCOMBE CHILD SAFETY CURRICULUM: <https://www.scootle.edu.au/ec/p/home>
- OUR WATCH RESPECTFUL RELATIONSHIPS EDUCATION: <https://education.ourwatch.org.au/a-whole-of-school-approach/support-for-staff-and-students/>
- TASMANIAN DEPARTMENT OF EDUCATION RESPECTFUL RELATIONSHIPS RESOURCE PACKAGE: <https://respectfulrelationships.education.tas.gov.au/about/>
- VICTORIAN DEPARTMENT OF EDUCATION: RESILIANCE, RIGHTS AND RESPECTFUL RELATIONSHIPS LEARNING MATERIALS: <http://fuse.education.vic.gov.au/ResourcePackage/ByPin?pin=2JZX4R>

Other examples also include those offered by:

- **NSPCC** (<https://learning.nspcc.org.uk/safeguarding-child-protection-schools/teaching-resources-lesson-plans/>)
- **Bravehearts** (<https://bravehearts.org.au/education/>)
- **Act4Kids** (<https://www.actforkids.com.au/our-services/education-services/learn-to-be-safe-with-emmy-and-friends/>)
- **NAPCAN** (<https://www.napcan.org.au/Programs/love-bites/>)

Reflection: families and community

Consider how families are, or can, be better encouraged to participate in decisions affecting their child.

Consider how the School or Service does, or can better:

- engage and openly communicate with families and the community about its child safe approach and ensure relevant information is accessible
- create opportunities for families and communities to be involved in relevant School or Service operations, including encouraging their children's participation and feedback
- provide clear and accessible information for families and communities about the organisation's operations, approach and policies relevant to children's safety, including Code of Conduct, record keeping practices and, complaints and investigation processes, e.g. publishing information on the School or Services website
- provide opportunities for comment on the School or Service's approach to child safety, including seeking periodic feedback from families and communities on issues of child safety and wellbeing and, providing families and communities with a say in the development and review of the CYRMS, as well as related policies, procedures and processes
- inform families and the community about the relevant operations and governance of the School or Service
- be responsive to the needs of the families and community they serve
- support approaches that build cultural safety through partnerships and respectful relationships.

For Services particularly, consider how Quality Area 6, collaborative partnerships with families and communities, applies.

Reflection: children and young people

Consider how children and young people are, or can be better:

- informed about who to talk to if they are feeling unsafe and know what will happen
- involved in decision-making in the organisation, including in relation to safety issues and risk identification
- informed about their rights, including safety, information, and participation
- encouraged to seek support (including from peers) to help them feel safe and less isolated; and be informed about their role in helping in the safety and wellbeing of their peers
- provided with age appropriate platforms to regularly provide their views and encourage participation in decision-making
- supported to connect with information, support and complaints processes, in ways that are accessible and easy to understand – mindful of individual's needs, such as developmental and cultural needs
- provided with timely feedback. This includes reporting back on incidents, concerns or complaints.

Consider what programs and resources are used, or can be used, to educate children and young people regarding:

- their rights, including their rights to safety and to be listened to
- identifying trusted adults and friends
- safe online applications to learn, communicate and seek help.

Are materials used child friendly? Are they produced in accessible language and formats that promotes inclusion and informs all children and young people of the support and complaints processes available to them?

Consider contexts where it is appropriate to offer access to developmentally suitable abuse prevention education or programs, particularly related to sexual abuse, and building practical skills to assist in strengthening self-protective skills and strategies. Specific focus should include power dynamics and educating children that no one has the right to invade their privacy and make them feel unsafe.

Consider how everyone in the School or Service is supported to understand children and young people's diverse circumstances, and specific supports and responses available to those who are vulnerable. Noting to:

- Give specific attention to the needs of Aboriginal and Torres Strait Islander children, children with a disability, children from culturally and linguistically diverse backgrounds, those who are unable to live at home, and sexually diverse children and young people.
- Consider specific policies to promote equity and respect diversity, and their focus on safety and wellbeing.

For Services particularly, consider how Quality Area 5, relationships with children, applies.

6. Code of Conduct for interacting with children

Requirements

CYRMS are **required** to reference the expected standards of behaviour for **all persons** who interact with children and young people, as a result of their enrolment at the School or Service, including:

- Employees
- Volunteers
- Children and young people
- Parents
- Council/board/committee members
- Students on placement/trainees/work exp.
- Visitors/spectators
- Consultants/contractors

Examples of topics regarding conduct include:

Behaviour management	Transportation
Supervision of children	Health and safety
Supervision of adults	Illness and injury management
Drop off/pick up: times and expectations	Photography
Physical contact	Technology/social media
Consent, e.g. medical care	Confidentiality/privacy
Language	Role specific expectations
One on one contact	Consequences/conditions
Relationships	Conflicts of interest

Note: *Our Commitment: Code of Conduct for Anglican Schools and Education & Care Services*, referenced below, meets these requirements for staff and volunteers. Additional role specific expectations may also be detailed in other School or Service documents, e.g. a home stay handbook.

Other key drivers:

Education (Accreditation of Non-State Schools) Regulation 2017

- Requires the School's governing body to ensure:
 - (a) the school's staff and students, and students' parents and guardians, are made aware of the processes for the conduct of staff and students, and response to harm
 - (b) the processes are readily accessible by staff, students, parents and guardians
 - (c) staff are trained annually in implementing the processes
 - (d) the school is implementing the processes

Safe Ministry to Children Canon

Responsibilities for Schools and Services which are Church Bodies, to implement a code of conduct for interacting with children, consistent with the standards and guidelines detailed in section 5 of *Faithfulness in Service* and approved by the Standing Committee of the General Synod of the Anglican Church of Australia.

Outcomes sought...

National Principles for a Child Safe Organisation:

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

United Nations Convention on the Rights of the Child:

Article 3: All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children.

OUR COMMITMENT: CREATING ENVIRONMENTS FOR CHILDREN AND YOUNG PEOPLE TO THRIVE

FOR STAFF AND VOLUNTEERS, THIS CODE IS REQUIRED TO BE IMPLEMENTED (FOR SCHOOLS AND SERVICES OWNED BY/SUBSIDIARY OF THE ACSQ). THIS MEETS SAFE MINISTRY TO CHILDREN CANON RESPONSIBILITIES.

- OUR COMMITMENT: [CODE OF CONDUCT](#)
- [ACKNOWLEDGEMENT OF AGREEMENT FORM](#) (FOR USE WHERE ACKNOWLEDGEMENT HAS NOT BEEN INTEGRATED INTO ANOTHER DOCUMENT SUCH AS EMPLOYMENT CONTRACT OR VOLUNTEER AGREEMENT)

IMPLEMENTATION RESOURCES:

- QUICK REFERENCE GUIDE
- FREQUENTLY ASKED QUESTIONS
- KEY TOPIC: IMPLEMENTATION
- KEY TOPIC: BOUNDARIES AND WHY THEY'RE IMPORTANT FOR EVERYONE
- KEY TOPIC: MANAGING CONFLICTS OF INTEREST
- PRIVATE CHILD CARE ARRANGEMENTS

OTHER RESOURCES

- CHILDREN'S RESOURCE: [WE WANT KIDS TO FEEL SAFE AND WELL!](#)
- INDUCTION OVERVIEW FOR NEW STAFF AND VOLUNTEERS ([SCHOOLS](#) AND [ECS](#))

OTHER RESOURCES

PROFESSIONAL BOUNDARIES: A GUIDE FOR QUEENSLAND TEACHERS:

<https://www.qct.edu.au/pdf/Professional%20Boundaries%20-%20A%20Guideline%20for%20Queensland%20Teachers.pdf>

STUDENT PROTECTION IN ANGLICAN SCHOOLS [POLICY AND PROCEDURES](#) & CHILD PROTECTION IN ANGLICAN ECS [POLICY AND PROCEDURES](#)

THESE POLICY AND PROCEDURES DETAIL THE PROCESS FOR MANAGING THE FOLLOWING CIRCUMSTANCES THAT MAY INDICATE A BREACH OF EXPECTED CONDUCT:

- ALLEGATIONS OF INAPPROPRIATE BEHAVIOUR OF STAFF OR VOLUNTEERS WHERE A CHILD OR YOUNG PERSON HAS BEEN HARMED OR PLACED AT RISK OF HARM
- SUSPICIONS A CHILD OR YOUNG PERSON HAS BEEN SEXUALLY ABUSED OR IS LIKELY TO BE SEXUALLY ABUSED

COMPLAINTS MANAGEMENT IN ANGLICAN SCHOOLS POLICY AND PROCEDURES & COMPLAINTS MANAGEMENT IN ANGLICAN ECS POLICY AND PROCEDURES

THESE POLICIES AND PROCEDURES DETAIL THE PROCESS FOR COMPLAINTS MANAGEMENT, INCLUDING THOSE RELATED TO BREACH OF CONDUCT EXPECTATIONS FOR STAFF AND VOLUNTEERS.

Reflection: code of conduct

Consider how, or how can, expected standards of behaviour and responsibilities:

- be explicit, clearly outlining behaviours towards children that the institution considers unacceptable
- cover all relevant cohorts who engage with children at the School or Service
- cover all relevant physical and online environments
- clearly include specific requirements about who to report concerns about possible breaches to, both internally and, where required (either by law or policy), externally.

For Services particularly, consider how Quality Areas 2, children's health and safety, and 4, staffing arrangements, applies.

Managing breaches

CYRMS need to reflect the School or Service's plan for managing breaches of expected conduct for interacting with children, for all relevant cohorts. Consider:

- What systems and supports are in place to actively support a culture where the naming and managing of potential transgressions in behaviour is encouraged and facilitated?
- How are people who raise concerns in good faith protected?
- When a concern is raised, what processes are used to manage these? Ensure these processes are consistent with policy.
- What documents reflect these plans?

Communication and support

Consider how the School or Service creates a culture where appropriate conduct is understood, and the naming and management of potential transgressions is encouraged?

Consider how all relevant cohorts are:

- well-informed about their roles and responsibilities, reporting and privacy obligations, and processes for responding to disclosures
- supported to feel empowered and assisted to appropriately draw attention to and challenge behaviours of concern, including possible breaches of the Code of Conduct
- provided with a safe and supportive environment to disclose harm or risk to children and young people, including advice on protection available where disclosures, reports or concerns raised, are made in good faith.

Consider how those delegated with responsibility for managing concerns are supported to meet these responsibilities to a high standard.

7. Policies and procedures for the recruitment, selection, training and management of persons

Requirements

*Schools and Services **must** have documented localised, operational policies and procedures, and related systems/processes in place to know about and manage **all** persons, paid and unpaid, engaged by the School or Service as related to the safety and wellbeing of children and protection of children from harm.*

These documents **must** reflect:

- Recruitment
- Selection
- Training, and
- Management

Within the CYRMS, consider and reflect the relevance of these guidelines to **all** types of people engaged by the School or Service, paid or unpaid (volunteers). Common types of paid roles include full time, part time, casual and those on individual contracts. All these various roles are referred to as 'staff'.

Strategies should be sufficiently catered to and referenced for each role and can be proportional to the contact the person will have with children. For example, strategies used for a supervised classroom volunteer will differ from a home stay host.

Consider **all persons** who have contact with children and young people as a result of their enrolment with or attendance at the School or Service. Specifically consider how these people are engaged and managed by the School or Service. Where not directly engaged as a staff member or volunteer (e.g. other students, tutors paid by a parent, persons residing on school grounds, visitors to Schools and Services) alternative risk management assessments, management and controls **must** be put in place (see section 11 of these guidelines), noting 'fringe' entry points are high risk. Controls may include some of the strategies discussed here in section 9, such as various screening mechanisms and training opportunities.

Outcomes sought...

National Principles for a Child Safe Organisation:

5: People working with children and young people are suitable and supported to reflect child safety and wellbeing in values and practice.

United Nations Convention on the Rights of the Child:

Article. Children should feel confident about the standards established in an organisation, particularly in the areas of safety, health, number and suitability of staff, as well as supervision.

Management

Every role, in a School or Service, paid and unpaid, needs to be actively managed. For each role, this management needs to be delegated to an appropriate person/s and include responsibility for performance management of the person/s engaged and oversight of the role. Oversight includes, but may not be limited to:

- Being an appropriate authority in the School to provide line management.
- Facilitating or being sufficiently assured recruitment, appropriate to the role, is undertaken.
- Facilitating or being sufficiently assured responsibilities associated with initial screening and the maintenance of screening/registration requirements are met.
- Actively managing conduct expectations and performance, including performance management and review processes. This includes probation periods and using these as an opportunity to review.
- Providing or being sufficiently assured appropriate induction and training requirements have been met.

It is strongly recommended that for each role type (paid and unpaid) relevant information, requirements (screening, registration, qualifications etc), responsibilities and related documents are detailed in a role description or duty statement, including details of the position/s responsible for management/oversight of each role. These can then be referenced within the CYRMS.

Where Schools and Services require a Working with Children Authority (WWCA) or other type of registration to be maintained as a condition of engagement, this should be clearly identified in the relevant employment contract or agreement. Schools and Services are also expected to have localised processes in place to ensure a person whose WWCA is suspended or cancelled do not continue to work in regulated employment. Note: for staff if a WWCA is suspended, seek appropriate advice related to the individual's employment rights.

Recruitment and Selection, including Screening and Probation

Other key drivers

Working with Children (Risk Management and Screening) Act 2000

- Every (potential) person engaged by the School or Service should not commence, or immediately stop working in their role if they are, or become, a 'restricted person' under Working with Children legislation. This person and the School or Service may be committing offences under this legislation, if a person works with children while meeting the definition of a restricted person.
- Each person engaged by the School or Service (staff and volunteers) is to be listed on a register (see section 11 of these guidelines).
- Each person engaged by the School or Service in "regulated employment" or conducting a "regulated business" is required to have a Working with Children Authority (WWCA - Blue Card or Exemption Card) prior to commencing in their role and to maintain their WWCA whilst engaged by the School or Service.
- In the majority of circumstances, persons engaged by the School or Service who require a WWCA are to be appropriately linked to the School or Service with Blue Card Services prior to commencing their role. This link is to be removed when the person is no longer engaged.

- The School or Service is to confirm and monitor the registration of each Approved Teacher, and each Registered Health Practitioner engaged by the School or Service in a function related to their role as a health practitioner.

Education (Queensland College of Teachers) Act 2005

- Each person engaged by the school as an Approved Teacher is registered or has permission to teach (PTT) through the Queensland College of Teachers (QCT) and the teacher is linked to the school with QCT.
-

Professional Standards Canon

Each prospective employee, prior to being offered employment, is to be checked against the National Professional Standards Register and the result of this check is considered prior to being offered employment.

RECRUITMENT AND SELECTION IN ANGLICAN SCHOOLS POLICY AND PROCEDURES

THESE POLICY AND PROCEDURES SUPPORT EFFECTIVE RECRUITMENT AND SELECTION OF STAFF AS A PREVENTATIVE APPROACH TO CHILD SAFETY.

Recruitment and Selection Guidance

Recruitment, including advertising, referee checks and screening, is to emphasise child safety and wellbeing. Effective recruitment and selection support a preventative approach to child safety.

Abuse is more likely to occur in institutions where particular factors are present. We can reduce the likelihood of abuse by targeting these factors. Recruitment and selection are a key area of importance. We want to discourage potential offenders from our services and encourage people who understand and prioritise children's safety and wellbeing.

For all persons, staff and volunteers, consider the applicability of the following:

- Use recruitment and selection processes to assess applicant's values, motives and attitudes for compatibility with a culture that sees children's safety and wellbeing as paramount.
- Assess core attitudes to children, e.g. understanding of professional boundaries, importance of listening to children, and the importance of adults having shared personal responsibility for the safety of children and young people.
- Understand professional boundaries are critical to maximising children's safety.
- Apply a critical eye. Be thorough and consider information carefully – look for red flags. Is there any information that indicates issues with boundaries, or other issues (such as rules breaking) impacting children's safety or wellbeing?

Vacancy Management

- Advertising: placing information up front about the School or Service's commitment to children's safety detracts potential offenders.
- Note the benefit of role descriptions/duty statements reflecting the School or Service's commitment to child safety, including relevant expectations specific to that position.
- Provide the Code of Conduct as part of the information package for the position, and require it to be read and agreement documented, as part of submitting an application.
- Suggested selection criteria for staff: 'must be able to demonstrate an understanding of appropriate professional boundaries and standards when working with children and young people', or similar.

Code of Conduct

Also see section 6 of these Guidelines. While assessing a person's suitability for a role, consideration should also be placed on their understanding and commitment to conduct expectations, especially regarding interactions with or about children and young people. Including this as part of the selection processes assists in engaging people who will contribute to creating a safe and supportive environment.

As identified within s4.13 and 4.14 of the [Our Commitment Code of Conduct](#), prior to accepting a position, the applicant should be asked to disclose if they:

- are currently charged with or convicted of an offence against a child
- have been acquitted of a charge of an offence against a child
- have had a charge of an offence against a child not proceed
- have had a prohibited status under applicable 'working with children' screening legislation lifted, or
- have been the subject of any disciplinary proceedings involving child abuse

If at any time during the recruitment process, information is received that any of these points apply the appropriate authority in the School or Service is to ensure the following occurs:

- consultation with relevant people (as detailed in the Code of Conduct)
- a documented risk assessment, and
- determination that no child will be at an increased risk of harm from this appointment

Interviews

Conducting structured interviews provides further opportunity to receive insight into an applicant's attitudes, values and understanding of professional boundaries and accountability. This is important in assessing their suitability to work in a School or Service environment. Use interviews to consider how the applicant's values and attitudes complement the School or Service's focus on child safety and wellbeing. Important areas to address during the interview process are:

- motivation to work in the School or Service
- understanding of children's development and needs
- values and attitudes towards children, including attitudes to children's rights and how they can be upheld
- understanding of professional boundaries
- reasons for leaving current or previous job

An open-ended style of behavioural-based questioning will give insight into the applicant's values, attitudes, and understanding of professional boundaries and accountability. Some useful questions may include:

- Tell us about why you want to work with children?
- How would the children and young people you have worked with previously describe you?
- Describe a time when you had to manage an interaction with a child whose behaviour you found challenging.
- Tell us about a time when you have had to comfort a distressed child.
- What boundaries are important when working with children and young people?
- If you were concerned about the actions or behaviour of a co-worker towards children or young people, how would you respond?

Note: not 'knowing' the answers to the above doesn't rule out applicants – not knowing is better than an inappropriate response as you can then train/model correct behaviour.

Referee checks

- Does the applicant provide appropriate referee options?
 - For staff consider all places where the applicant has worked with children - especially the last 5 years. Is the applicant able to nominate referees from each place of employment, who were in a line management position to the applicant?
 - For volunteers, particularly home stay hosts and any other role having significant contact with children and young people (such as unsupervised), seek, at least, two personal referee checks, and consider the nominated referee's suitability.
- Always check referees and use as part of the suitability assessment.
- Take action to confirm identity of referees.
- Have mandatory and consistent questions for referees.
- When contacting the referee, establish the relationship to the applicant, including how long the applicant and referee worked together, the specifics of the positions, and seek information about:
 - the details of the relationship between the referee and the applicant (length of time and nature of relationships)
 - knowledge of the applicant's work or interactions with children and families, including feedback on any observations
 - opinion on the applicant's suitability for the position and context, including any concerns about the applicant's attitudes or conduct
 - the applicant's perceived strengths and weaknesses.
 - whether the referee would hire the person again, particularly in a role working with children, and
 - whether they have any concerns about the applicant working with children.
- Take note of any pauses in the referee's responses as this may indicate hesitation. Ask, for example, 'I noticed you paused, any particular reason?'

Screening

- Always verify applicant's identity, qualifications, professional registration and relevant screening checks prior to entering into an employment agreement or similar.
- Ensure people who require a Working with Children Authority (WWCA - Blue Card or Exemption Card) have a current authority **prior to commencement**, noting substantial penalties can apply for the individual and the School or Service. **Do not engage a person until all relevant screening has been completed.**
- Recognise that WWCA and checking the Anglican Church's National Professional Standards Register can detect only a subset of people who are unsuitable to work with children, and that these checks are only one part of a suite of recruitment and selection practices.
- Consider any need for a National Police Clearance or international criminal history checks.
- Complement these with referee checks as discussed above.
- Ask applicants to disclose if something is going to come up (to help assess their suitability and understand how long check may take).

APPENDIX 1:

ADVICE ON SCREENING REQUIREMENTS IN SCHOOLS AND SERVICES

THIS APPENDIX PROVIDES DETAILED ADVICE ON SCREENING REQUIRED BY ROLE TYPE.

SCREENING DISCUSSED INCLUDES:

- RESTRICTED PERSONS
- WORKING WITH CHILDREN AUTHORITY
- APPROVED TEACHERS
- REGISTERED HEALTH PRACTITIONERS
- ANGLICAN CHURCH PROFESSIONAL STANDARDS REGISTER
- NATIONAL POLICE CHECKS
- REFEREE CHECKS

Working with Children Requirements

The Working with Children (Risk Management and Screening) Act 2000 requires diligent screening of relevant persons engaged (employed or volunteering) within a School or Service. Penalties can often apply to individuals and organisations who do not comply with these requirements.

Key screening obligations include:

- If the School or Service has reason to suspect a person who they are considering engaging or have engaged to work with children is a restricted person, they **must not** engage them until this suspicion is sufficiently investigated and found to be incorrect.*
- If a person is required by their role to have a Working with Children Authority, they **must not** commence at the School or Service until the Working with Children Authority is obtained and the person is linked to the School or Service with Blue Card Services. See Appendix 1 for further information.*

Working with Children Risk Management and Screening Act 2000 and Regulation 2011

A CURRENT COPY OF IN FORCE LEGISLATION IS AVAILABLE ONLINE:

<https://www.legislation.qld.gov.au/browse/inforce>

This legislation outlines strict requirements regarding the eligibility of people to work in child-related employment. Decisions about WWC applications are made in order to secure the welfare and best interests of children, and create a safe and supportive service environment.

Responsibility for implementing Working with Children screening ultimately rests with the Head of a School or Nominated Supervisor of a Service, however implementation is commonly delegated according to the requirements of the School or Service. Delegations are to be appropriately documented. *See section 8 of these Guidelines for further information.*

Categories of regulated employment and businesses are detailed in Schedule 1 of the Act. The Act also details certain exemptions and definitions that apply (for example frequency of regulated employment, and regulations defining the usual functions of employment). Schools and Services are also to consider alternative or additional screening, appropriate to the role. *See Appendix 1 for further guidance.*

BLUE CARD SERVICES

THE QUEENSLAND GOVERNMENT'S BLUE CARD SERVICES, MANAGES WORKING WITH CHILDREN SCREENING AND AUTHORITY, AND PROVIDES APPROPRIATE INSTRUCTION VIA THEIR WEBSITE:

<https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card-services>

BLUE CARD SERVICES, PROVIDES SUPPORT FOR ORGANISATIONS USING THEIR PORTAL:

<https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/organisations/portal>

BLUE CARD SERVICES, PROVIDES SPECIFIC ADVICE ON ELIGIBILITY TO HOLD A WORKING WITH CHILDREN AUTHORITY, INCLUDING DISQUALIFYING OFFENCES:

<https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/eligible>

Example of relevant content in a Volunteer Agreement regarding 'restricted employment':

"In keeping with relevant Queensland law, XXX requires that all volunteers be **eligible** to hold a Working with Children Authority (WWCA, Blue Card or Exemption Card), even though they may be exempt from **requiring** a WWCA, e.g. parents of a child who regularly attends XXX, volunteers under the age of 18, etc.

In submitting this volunteer registration form you must acknowledge that you:

- Do not currently have a suspended WWCA or hold a Negative Notice.
- Are not a disqualified person as detailed in *the Working with Children (Risk Management and Screening) Act 2000*.
- Are not currently charged with or have been convicted of a serious or disqualifying offence as detailed in *the Working with Children (Risk Management and Screening) Act 2000*.

Further information about who is eligible to hold a Blue Card as well as a list of serious and disqualifying offences can be found on the Blue Card Services website:

<https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/eligible>.

I acknowledge that I have read the above information and confirm that I do not currently have a suspended WWCA or hold a Negative Notice, am not a disqualified person and am not currently charged with or have been convicted of a serious or disqualifying offence.

I also acknowledge and accept my responsibility to immediately cease my volunteering role if I become a 'restricted person'."

Supporting applicants

If a WWCA applicant is having issues with Blue Card Services (BCS) and their application, nominated staff at the School or Service can engage with BCS on their behalf, providing that the applicant has provided appropriate consent to BCS.

Probation

- Probation is a valuable period of assessment regarding a new staff member or volunteer's capability.
- Taking probation seriously reinforces the School or Service's commitment to its people delivering high standards of care.
- Seeking feedback from others and undertaking direct observation are opportunities for managers/supervisors to gather information to inform an assessment of the person's strengths and weaknesses.
- Probation is an opportunity to act early, seeking to identify issues and prevent them from escalating.

Induction and Training

Other key drivers

Working with Children (Risk Management and Screening) Act 2000

- Strategies **must** include reference to training materials for persons engaged by the school to:
 - a) help identify risks of harm and how to handle disclosures or suspicions of harm; and
 - b) outline the risk management strategy
-

Education (Accreditation of Non-State Schools) Regulation 2017

- Requires the School's governing body to ensure:
 - (a) the school's staff and students, and students' parents and guardians, are made aware of the processes for the conduct of staff and students, and the response to harm
 - (b) the processes are readily accessible by staff, students, parents and guardians
 - (c) staff are trained annually in implementing the processes
 - (d) the school is implementing the processes
-

Education and Care Services National Regulations 2011

- Require the Approved Provider of an education and care service **must** ensure that nominated supervisors and staff members at the service who work with children are advised of:
 - a) the existence and application of the current child protection law, and
 - any obligations that they may have under that law
-

Induction and Training Guidance

Induction and training are critical to supporting the people engaged by Schools and Services to provide effective child safe responses and practices.

Schools

Most new staff are required to successfully complete the online module, Safeguarding our Students. Staff should be enrolled at the earliest possible intake and should complete the module within 30 days of enrolment. It may not be realistic for very short-term workers (e.g. 8 weeks or less), who are unlikely to return, and seasonal staff (such as coaches), to be enrolled in the course.

All new staff, including short term workers, as well as seasonal workers and volunteers should receive an induction in student protection, child and youth risk management and the Code of Conduct. An Induction Overview has been provided to assist this briefing. The annual child protection refresher session may also provide useful content to assist in these inductions.

The annual child protection refresher session should be provided to all continuing staff each year.

Services

All new staff, including short term workers, as well as seasonal workers and volunteers should receive an induction in student protection, child and youth risk management and the Code of Conduct. Induction material has been provided by the Anglican Schools Commission.

Both

The Anglican Schools Commission usually provides school-based Student Protection Officers and service based Nominated Supervisors and Directors with annual professional development. This is provided in a 'train the trainer' format to be delivered to relevant School and Service staff during that year.

The Anglican Schools Commission is commencing a project to develop and implement a plan for how the child protection education and information needs for student, staff and volunteer, and parent/caregiver cohorts can best be met. Consultation and collaboration will occur with Schools and Services during 2020 and 2021.

TRAINING TOOLS FOR STAFF AND VOLUNTEERS

SAFEGUARDING OUR STUDENTS COURSE INFORMATION (NEW SCHOOL STAFF ONLY):

- GUIDANCE PAPER FOR COMPLIANCE TRAINING MANAGERS
- SAI GLOBAL LMS GUIDE
- SAI GLOBAL FAQs

CHILD PROTECTION REFRESHER MATERIAL ([SCHOOLS](#))

CHILD PROTECTION REFRESHER MATERIAL ([ECS](#))

ADDITIONAL RESOURCES ([SCHOOLS](#) AND [ECS](#))

Reflection: management of persons

Are the relevant procedures for recruitment, selection, training and management of persons engaged/proposed to be engaged, sufficient and consistently applied?

What evidence shows:

- recruitment, including advertising, referee checks and staff and volunteer pre-employment screening, emphasise child safety and wellbeing?
- duty statements, selection criteria and referee checks demonstrate children and young people are valued and respected, and a serious commitment to child safety and wellbeing is required?
- training requirements are met?
- staff and volunteers facilitate child-friendly, developmentally and culturally appropriate, ways for children to express their views, participate in decision-making and raise their concerns; including the involvement of families in advocating for their children?
- staff and volunteers are attuned to and recognise possible indicators of harm?
- staff and volunteers respond effectively when issues of child safety and wellbeing or cultural safety arise?
- all concerns of child harm or risk of harm are taken seriously?
- ongoing supervision and people management is focused on child safety and wellbeing?
- ongoing staff support, supervision and performance management processes, involve child safety elements?

Consider all cohorts of staff and volunteers across the School or Service. Where issues are identified or gaps exist, what action can be taken?

For Services particularly, consider how Quality Areas 2, children's health and safety, and 4, staffing arrangements, applies.

Communication and support

Consider how does, or how can, the School or Service provide regular opportunities to educate and train staff on child safety and wellbeing policies and procedures, and evidence-based practice. What opportunities are there for staff to understand best practice approaches to child safety?

Consider how, or how can, the School or Service be confident, through appropriate:

- induction
- training
- information
- support, and
- supervision
- that **all staff and volunteers** are aware of/understand their responsibilities to children and young people, particularly regarding implementation of child safety policy and procedures, including the following obligations:
 - reporting
 - information sharing
 - record keeping

Who to share information with, when to share information, what information to share, how to share the information and how that information sharing will be recorded and stored?

Reflection: management of persons continued

- that **all staff and volunteers** are aware of/understand how to recognise indicators of harm or risk of harm to children and young people, including:
 - physical and behavioural indicators of trauma and harm
 - characteristics of harmful behaviour in various cohorts and contexts.
Cohort examples: caregivers and relatives, unrelated adults, and other children or young people
 - the school or service's behavioural expectations and how to identify and act on inappropriate behaviour which may be abusive or a precursor to abuse, including grooming
- that each staff person or volunteer, **proportional** to their role and associated responsibilities:
 - has sufficient knowledge of the different way children and young people express concerns or distress and disclose harm
 - has sufficient understanding of children and young people's developmental needs
 - understand their obligations on information sharing and record keeping
 - is trained to recognise and respond effectively to children and young people with diverse needs
 - is trained and has access to information on how to build culturally safe environments for children and young people
 - has received training on the rights of children and young people in relation to records being created about children and young people and their use of those records.

Managing breaches

Are effective complaints management and performance management policy, procedure and processes in place for all role types (paid and unpaid)?

Are effective assurance and oversight mechanisms in place to ensure supervisors/managers or those with related responsibilities are meeting expectations?

8. Policies and procedures for compliance with the Working with Children (Risk Management and Screening) Act and the keeping written records of matters about each person engaged by the School or Service

Requirements

CYRMS **must** include policies and procedures for compliance with the *Working with Children (Risk Management and Screening) Act* (the Act), including keeping a written record of matters under the

Outcomes sought...

National Principles for a Child Safe Organisation:

5: People working with children and young people are suitable and supported to reflect child safety and wellbeing in values and practice.

United Nations Convention on the Rights of the Child:

Article. Children should feel confident about the standards established in an organisation, particularly in the areas of safety, health, number and suitability of staff, as well as supervision.

QUEENSLAND GOVERNMENT: INFORMATION FOR ORGANISATIONS EMPLOYING BLUE CARD WORKERS

<https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/organisations>

BLUE CARD SERVICES (BCS), PROVIDES SUPPORT FOR ORGANISATIONS USING THEIR PORTAL:

<https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/organisations/portal>

Act, relating to each person engaged by the School or Service, for example:

- a) whether or not the School or Service considers the person must apply for a Working with Children Authority (WWCA – Blue card or Exemption Card).
- a) whether or not a WWCA application has been made
- b) if a WWCA has been issued, the date of expiry of the notice.

The Working with Children in Anglican Education Policy and sections 9 and 10 of these Guidelines and Procedures are intended to assist in meeting this requirement. Localised documents are also required to effectively implement this requirement in the School or Service's operations.

APPENDIX 1: ADVICE ON SCREENING REQUIREMENTS IN SCHOOLS AND SERVICES

THIS APPENDIX PROVIDES DETAILED ADVICE ON SCREENING REQUIRED BY ROLE TYPE.
SCREENING DISCUSSED INCLUDES:

- RESTRICTED PERSONS
- WORKING WITH CHILDREN AUTHORITY
- APPROVED TEACHERS
- REGISTERED HEALTH PRACTITIONERS
- ANGLICAN CHURCH PROFESSIONAL STANDARDS REGISTER
- NATIONAL POLICE CHECKS
- REFERREE CHECKS

Notifiable/Contact Person/s

The Act requires a regulated business to nominate a 'Notifiable Person' with Blue Card Services (BCS). This person becomes the primary 'Contact Person' for BCS. In Schools and Services, the notifiable person is the employing authority (e.g. Head of School or Nominated Supervisor of the Service).

The Notifiable Person should nominate a second Contact Person to BCS to cover absences of the primary Contact Person. In identifying a suitable person, be mindful they require sufficient authority within the School or Service and may receive sensitive information about persons engaged by the School or Service that is required to be appropriately managed.

BCS requires the current details of the Contact Person/s in each School or Service. It is imperative that these details are kept current with BCS.

Responsible Person and Organisational Representative/s

One person is to be allocated as a Responsible Person, expected to provide oversight to the WWC Register and internal compliance. This includes ensuring the WWC Register is current.

Contact People and/or other staff members can be delegated the role of Organisation Representative. Delegation to roles such as WWCC Coordinator, Home Stay Coordinator, Volunteer Coordinator or Sports Coordinator may be particularly sensible.

Consideration should also be given to **business continuity** should a Responsible Person or Organisational Representative be unavailable. The following responsibilities are required to be met by these roles:

- *Document and apply local work instructions/processes consistent with the Working with Children in Anglican Education Policy, with consideration given to these Guidelines and Procedures.*
- Implement and meet the School or Service's responsibilities regarding Working with Children Authorities and complete/accurate Working with Children Registers. Recommendations on how to do so are provided below.

Online Validation and Linking of WWCA

These Guidelines seek to be consistent with changes to the Working with Children legislation that came into effect on the 31 August 2020. These changes will mean a person can apply for a paid Blue Card without being linked to an organisation. Volunteers seeking a card at no cost will still be required to be linked to an organisation. This can occur through the organisations interface with the online portal.

Prior to a person who requires a Working with Children Authority commencing, the School or Service **must both confirm the validity of a WWCA and link** that person to their organisation. This assures the School or Service that the person has a current WWCA and ensures the School or Service will be notified by BCS of any change in that person's police information or eligibility status.

Exception: the exception to linking a person is where the person is a trainee student or pre-service teacher, who is recorded on the Register of the Registered Training Organisation (the education provider). This should be confirmed with the Education Provider prior to the trainee's commencement. The trainee or pre-service teacher is also placed on the School or Service's Working with Children Register.

*Prior to notifying BCS about the employment or proposed employment, a School or Service **must** take reasonable steps to verify the person's identity and that this identity is consistent with their Working with Children Authority.*

Working with Children (WWC) Register (also known as Blue Card Register)

Prior to their commencement, all employees, volunteers, and regulated businesses **must** be placed on the WWC Register for the regulated business or employer by whom they have been engaged by (see section 4 of these guidelines), regardless of whether they are required to apply for a WWCA.

Once a person is engaged by the School or Service and entered onto the Register, this entry is not to be deleted, even if the person ceases their engagement.

Note: WWC Registers can also be used to record additional information such as contact details, completion of induction/training, and/or acknowledgement of Code of Conduct or other relevant policies.

EXAMPLE TEMPLATE: WWC REGISTER

Maintaining WWCA: Renewals

It is in the School or Service's best interest to actively support people engaged to maintain their WWCA. *Schools or Service's may be committing an offence under the Act if the person remains engaged, but their WWCA has expired and a renewal application has not been made prior to expiry.*

Localised processes are required to outline the actions to be taken in these circumstances.

Applicants can apply to renew their WWCA 16 weeks from expiry. Changes to personal contact details can be updated at any time, online.

The WWC Register is to clearly identify the expiry date of each WWCA. The Register and local processes should support an internal alert warning at least 16 weeks prior to an expiry date.

It is preferable that the alert is automated and provides alerts to the card holder and the Organisational Representatives responsible for the Register. Follow-up processes should outline actions taken to ensure the WWCA is applied for/ renewed prior to the expiry date.

Note: The date of birth (DOB) of residents in the home of a home stay provider, or other School or Service volunteers who are nearing their 18th birthday, can be recorded on the Register as an expiry date and used as the 'expiry' alert to notify that a WWCA is required, prior to their birthday.

Leaving an Organisation

Once an employee or volunteer leaves the School or Service, BCS are to be notified as soon as practicable.

The WWC Register is to be updated to reflect that the person is no longer linked with the School or Service at BCS and that the person is no longer with the School or Service. The person's WWCA status is updated to 'inactive'. Note this is important to ensure legislated privacy obligations are met.

Change in Police or Disciplinary Information

A person with a WWCA no longer has an obligation through the Act to advise their employer of any change to their police information. If a School or Service wishes to require an employee to disclose this information, alternative mechanisms need to be considered, such as localised conditions of employment.

BCS receive information on changes to people's information, e.g. from Queensland police. BCS will determine whether the situation changes the applicant's eligibility to work with children and young people (e.g. suspension or cancellation of WWCA).

Note: BCS are only notified of changes to Queensland history. Interstate history is only checked during initial application and renewal application processes.

Cancellation, Suspension, or Negative Notice

BCS will notify the School or Service in the event of any suspension or cancellation of a person's WWCA, only when their card has been correctly linked to the School or Service.

BCS will notify the Contact Person in the event of a negative notice as a result of a change in police or disciplinary information.

*A person with a suspended WWCA or negative notice **cannot** continue in 'regulated employment'. See section 9 of these Guidelines for further information.*

The School or Service WWC Register is to be updated to note the notification received from BCS, and appropriate action taken to protect children at the School or Service.

Audit

The Responsible Person is responsible for oversight of the internal localised processes for the management of WWCA and the WWC Register. As such, the Responsible Person is recommended to facilitate/undertake monthly internal audits to ensure the integrity of the process within the School or Service. (Note: BCS have the legislative authority to audit regulated organisations).

The outcomes of these Audits are to be reported:

- Immediately to the Head of School or Nominated Supervisor if a breach of law is identified
- Quarterly, within the CYRM Committee report to the Head of School/School Council or Nominated Supervisor/Management Committee.

Key matters to check at time of the Audit are:

- All relevant information is recorded in the WWC Register (look for missing cells)
- All new people engaged have been added to the WWC Register (preceding months)
- That alert dates are 16 weeks prior to a Card's Expiry
- Identification of alert dates where cards are due to expire or a volunteer/ or (for Home Stay) an adult household member is due to turn 18 years old within 16 weeks

- For alert dates within 16 weeks, appropriate action has been taken to support the person to apply for their renewal/ WWCA.

In addition to the Blue Card Service's Online Portal, careful consideration is to be given as to what localised systems can be cross referenced with the WWC Register, such as payment and sign in systems and information databases to ensure all relevant persons are recorded on the WWC Register. For example, in addition to staff on payroll, careful consideration should be given to:

- Home stay hosts and their residents
- Volunteers
- Coaches
- Tutors
- Regulated Businesses engaged by the School (see section 9 and 11 of these Guidelines), particularly sole operators

Managing Breaches

For owned and subsidiary Schools, or ECS where the ACSQ is the Approved Provider, the Executive Director ASC, is to be immediately notified in writing by the Head of School or Nominated Supervisor of all reported or identified breaches of 'the Act'. This includes, but may not be limited to:

- If the School or Service engages a person who is required to have a WWCA and does not.
- If the School or Service continues to engage a person whose WWCA has expired and an application for renewal was not made prior to their expiry.
- If the School or Service engages a person they reasonably suspect or know is a Restricted Person.

This written notification is to include:

- what actions lead to the breach
- what actions have been/ are being taken to remedy the matter
- what actions are being taken to prevent a similar breach into the future

Reflection: Policies and Procedures for Keeping Written Records

Consider the School or Service's approach. Are:

- these Procedures consistently applied?
- localised processes for compliance sufficient?
- localised processes documented?
- sufficient quality assurance, accountability and business continuity strategies in place to support local systems to be robust and of a high standard?
- are all areas of the School or Service engaging with the process – particularly volunteer management, for example, in home stay, sports and classrooms?
- are there issues or risks that require identification, documentation and/or planning?
- are there improvements to be made?

For Services particularly, consider how Quality Area 4, staffing arrangements, applies.

Communication and Support

- Are the people who use the system given an opportunity to provide feedback and suggest improvements?
- How do key stakeholders know about the process and how to use it? Are there improvements needed?

Managing Breaches

Have breaches occurred? If so, has a root cause analysis been completed and causal issues addressed?

9. Risk management plans for high risk activities and special events

Requirements

CYRMS **must** refer to risk management plans for high risk activities and special events. Matters that are identified as high risk or as a special event require a documented risk management plan.

Many activities undertaken in a School or Service are both high risk and ongoing in nature, e.g. the online environment; particular physical environments, such as a swimming pool, or child accommodation; or events such as regular outings/excursions or sporting activities. Where these occur, it is strongly recommended that those Risk Management Plan are referred to specifically within the CYRMS.

Outcomes sought...

National Principles for a Child Safe Organisation:

8: Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed

United Nations Convention on the Rights of the Child:

Article 3.3. Children should feel confident about the standards established in an organisation, particularly in the areas of safety, health, number and suitability of staff, as well as supervision.

Risk assessment

Risk assessment is integral to identifying high risk activities. *All activities undertaken by or within the School or Service require risk assessment.* Children and young people are often exposed to a variety of **environments, activities and people** related to their enrolment at a School or Service. Schools and Services are responsible for analysing these circumstances to identify risks and plan accordingly.

Effective management of risk can support the safety of children and young people, while creating worthwhile opportunities. *All staff need to be supported to understand their responsibilities for proactively assessing the risks associated with all contexts and putting effective strategies in place to manage those risks.* It is important those with appropriate authority approve these arrangements, with specialist advice sought where needed.

Key questions for all matters:

- Does this create any potential risk to the safety of children and young people? Consider the environment, activities and people children could reasonably be foreseen to be exposed to.
- Are there effective controls in place to adequately reduce these risks?
- Do the people who need to implement these controls understand their responsibilities to do so?
- Are risk assessments and plans (including controls) recorded in a way that enables the School or Service to evidence that all action that could be reasonably expected has been taken to protect children from harm?
- Are effective quality assurance strategies in place to be confident this is happening?

RELEVANT ACSQ POLICY AND PROCESSES

[RISK MANAGEMENT FRAMEWORK FOR OWNED AND SUBSIDIARY SCHOOLS \(2020: IMPLEMENTATION UNDERWAY\)](#)

[RISK ASSESSMENTS FOR EDUCATION AND CARE SERVICES](#)

SECTION 2.1 OF THE COMMONWEALTH CHILD SAFE FRAMEWORK:

<https://pmc.gov.au/sites/default/files/files/pmc-child-safe-framework.pdf>

Common and inherently high-risk activities

Procurement of a Business, or Hiring out use of School//Service Facilities

One of the Key Action Areas of Principle 8 for Child Safe Organisations, is that *“organisations that contract facilities and services from third parties have procurement policies that ensure the safety of children and young people.”*

Schools or Services often engage other businesses to provide services to children and young people enrolled or provide permission for another business to use the School or Service facilities to deliver their business. Where this occurs, a risk assessment as to the safety of this arrangement for children and young people, is always to be considered as part of the approval decision.

Proactively consider the risks posed where the School or Service is engaging a business or contractor to provide an activity on the School or Service’s behalf, or they are using the School’s premises or facilities. *Often these engagements create increased risk for the School or Service, as responsibility for the safety of children and young people is retained however the School or Service may have decreased knowledge or control of the activity being provided.* Consider what:

- questions can be asked
- information can be obtained
- strategies can be put into place

to be assured the business is assessing and controlling risk and applying practices that foster a child safe culture. It may be appropriate for the school to actively support the business or contractor to provide a safe service to students, e.g. through using strategies detailed in the School or Services’ own CYRMS.

Where this business is a regulated business, or employs people in regulated employment, they are required to comply with the *Working with Children (Risk Management and Screening) Act 2000* and must therefore have a Child and Youth Risk Management Strategy (CYRMS). The quality of this Strategy is to be considered by the School or Service as part of the decision to engage with this business and assess any risk this arrangement may pose. In these circumstances, obtain a copy of the business’ CYRMS, and referenced documents (e.g. Code of Conduct or WWCA Register) prior to engagement. Review this CYRMS and referenced documents and seek to be satisfied of their quality, asking for additional assurance if needed. Common examples include:

- Private teaching, coaching or tutoring
- Emergency services cadet program
- Sport and active recreation
- Churches, clubs or associations involving children

Key considerations

- a) (Usually in the procurement stage of seeking to engage the business) assess the level of risk to children and young people, and, where applicable (e.g. a high-risk activity or special event), ensure a risk management plan is developed, documented and implemented.
- b) Consider whether engagement of this business should be considered as the School or Service engaging a person in work and therefore the person is managed as an employee – either paid or unpaid (for the purposes of child and youth risk management). This means that the school/service should be able to reference and have a relevant CYRMS for managing this person/role similar to what they need to have for any other employee. Examples may be where a music tutor is engaged and invoices the School or Service for payment; or where a work hire

company provides a particular person to undertake work for the School or Service (i.e. the school/service may pay the work hire company not the person directly). See sections 7 & 8 of these guidelines for further advice.

- c) Where (b) does not apply, if the business is a regulated business or employs people in regulated employment:
1. review the business' CYRMS as part of the school's procurement process
 2. require compliance with the *Working with Children (Risk Management and Screening) Act 2000* as a condition of engagement
 3. verify the business operator's Working with Children Authority (WWCA) prior to commencement and on, at least, an annual basis. This should be recorded on the School or Service's WWC Register
 4. where the business operator is a sole operator, wherever possible, link their WWCA to the School or Service to provide real time monitoring and oversight.
- d) Where (b) and (c) do not apply, the business operator's details and reasons for not requiring a WWCA, is to be recorded on the School/Service's WWC Register.

Note, give careful consideration to whether engagement of a business is actually engagement of a person in regulated employment (e.g. schools, ECS etc.) – refer to frequency rules and applicable definitions of regulated employment (including for example, schedule 1 in the Act and definitions of usual functions of employment) – if so (b), above, applies. See sections 7 and 8, and appendix 1 of these guidelines for relevant advice.

Strongly consider seeking a WWCA (Blue Card or Exemption Card) for relevant individuals where these persons (such as guest speakers to children) would require a WWCA if this activity was provided within the School, Service or similar more than 7 days in a calendar year, even if that timeframe is not met for your particular School or Service. Deliberations could include level of supervision provided and whether the individuals commonly provide such services.

International Students, including Home Stay

Other key drivers

The National Code of Practice for Providers of Education and Training to Overseas Students 2018

The Commonwealth's *Education Services for Overseas Students Act* legislates the National Code of Practice for Providers of Education and Training to Overseas Students 2018. This Code is a legislative instrument that applies to international students. Standard 5: Younger Overseas Students is particularly relevant. Of note is the school's responsibility, as a registered provider, to "take all practical steps to ensure welfare (of relevant students) is maintained at all times, regardless of the overseas student's study circumstances". This responsibility **cannot be delegated**. This includes the **requirements** to:

- give age and culturally appropriate safety information to overseas students under the age of 18 years on:
 - What to do and who to contact in emergency situations, including contact numbers of nominated staff members or service providers; and
 - How to report any incident or allegation of sexual, physical or other abuse.
- where the School has a CAAW (Confirmation of Appropriate Accommodation Welfare) letter they must have and implement processes for "verifying that overseas student accommodation is appropriate to the overseas students' age and needs:
 - prior to the accommodation being approved; and
 - at least every six months thereafter."

This includes "an initial physical site visit to verify the overseas student's accommodation, prior to the accommodation being approved"; and "rigorous processes" in place for subsequent

verifications, which could include one or more of the following: a physical site visit, a student interview, a student survey, or any other way of confirming that the accommodation still meets the overseas student's needs.

ASSESSMENT GUIDANCE FOR HOME STAY

Guidance

- a) Schools need to be able to evidence the actions taken to both prevent and respond to abuse of young people, including compliance with legal obligations. In Home Stay, processes at the following stages should be particularly considered:
 - Recruitment and screening (suitability assessment) of potential hosts
 - Training of hosts
 - Management of hosts, including review of host suitability
 - Placement matching practices and processes
 - Pre-placement communication to the student
 - Placement support, including six monthly verifications
 - Student support (communication, welfare and care management)
- b) Schools need to be able to evidence the use of thorough and documented processes to assess a host's ability to meet the Home Stay Standards.
- c) Schools also need to document and apply "rigorous processes" for the six-monthly review of each placement. As described in the National Code, this may use various mechanisms, however it must be recorded as a review for the purpose of verifying that each overseas student's accommodation is appropriate to that student's age and needs. The practice of a physical home visit as part of assessing suitability, at least once every twelve months, is recommended.
- d) Schools need to ensure specific quality assurance mechanisms are developed, implemented and embedded in the school's operations, including:
 - Key performance indicators, and appropriate governance and reporting mechanisms for these indicators, for example home stay suitability verifications and WWCA audit outcomes.
 - Having a decision maker for host family approvals and verifications separate to the person who undertakes the assessment. The 'assessor' can make recommendations and could be part of an optional 'group' who considers the application, however should not be the 'decision maker'. The roles of assessor and decision maker should be specifically delegated to relevant positions and this should be reflected in their role descriptions.
 - Specific consideration of the management of the emergency contact arrangements for young people in home stay (e.g. mobile phone number), noting the need for this to be regularly managed by more than one staff member to support business continuity to allow appropriate rest time and assist in ensuring such a key task is not dependent on one individual.
 - A strategy for demand management and the required resourcing, identifying:
 - appropriate ratio of hosts to staffing
 - appropriate ratio of students/ short term young people on tour to staffing
 - A strategy for effective communication with young people and the ability to evidence such, including:
 - culturally and developmentally appropriate information on emergency contacts and reporting abuse is to be given

- methods of written communication used to share information required by law, for example Orientation PowerPoint or emergency contact 'cards', are saved as evidence, including version control and dates used.

Boarding, Billeting and other Overnight Accommodation

Unrelated children, young people and adults in overnight accommodation have inherently high risks. Schools need to be sufficiently satisfied about the ability of adults to provide safe care in overnight accommodation. Particular consideration should be given to high risk circumstances such as where the care is being provided:

- by persons unrelated to the child, or
- by any adult in Australian accommodation (including our boarding houses) who has spent substantial periods of time living overseas (due to the limitations of WWCA) or
- in another country.

The risk of abuse by another child or young person must also be explicitly considered.

All arrangements of this nature must have documented plans that consider the risks to the children or young people and what reasonable action can be taken to mitigate these risks. For example, effective recruitment and selection methods, including screening, together with safety planning, including explicit expectations of care and boundaries, and clear communication to all relevant stakeholders (e.g. students, staff and volunteers, and other organisations).

In billeting environments, examples of risk mitigation include:

- a) all adult household members of billeting families to have a Blue Card (see appendix 1)
- b) adults taking responsibility for the student's care are briefed appropriately (adults engaged by Anglican Schools should also be inducted as volunteers)
- c) students not being the only child/young person in the house and
- d) explicit instructions for young people about standard of care they should receive and who they should talk to if worried or concerned about anything (multiple and immediately accessible options).

Also, a risk assessment and plan should always be in place for all persons residing in School or Service campus accommodation. At minimum, this plan should include a condition that, wherever possible, all adult household members have a WWCA, linked to the School or Service, prior to the commencement of this living arrangement; and if the adult is unable to obtain a WWCA because they are not working or volunteering, or planning to work or volunteer, in regulated employment, then the person, prior to commencement of the living arrangement, is to be asked to:

- Confirm in writing that they are not a restricted person under the *Working with Children (Risk Management and Screening) Act*, and
- Agree in writing to provide the Head of the School or Nominated Supervisor of the Service, information on any changes to their police information, including charges not yet finalised, and
- Provide/agree to a current National Police Clearance (prior to commencement and on at least, an annual basis).

Section 9 of these guidelines may also be useful in helping to identify appropriate risk management controls in these circumstances.

Any decision to ask a person to cease residing on the School or Service grounds, is to be at the Head of School or Nominated Supervisor's absolute discretion.

Online safety

The Online Safety and Digital Wellbeing **Advocate** drives the Anglican School's Commission's work on online safety and supports schools to develop an annual Online Safety and Digital Wellbeing Action Plan. Information on this Plan is available from the Advocate as well as being accessible through each School's Online Safety and Digital Wellbeing Champion.

ONLINE SAFETY RESOURCES

Online Safety Educational Framework: <https://www.esafety.gov.au/sites/default/files/2019-11/Online%20safety%20education%20framework%20-%20fact%20sheet.pdf>

Reflection: Risk Management Plans for High Risk Activities and Special Events

Consider the School or Service's approach.

- Are all relevant contexts adequately and proactively assessed for risk? Give consideration to all online and physical environments, activities and people children and young people are exposed to as a result of their attendance or enrolment at the School or Service.
- Have the risk management assessments and plans applied focused on preventing, identifying, and mitigating risks to children and young people?
- Have controls applied been effective?
- Do the controls applied by staff and volunteers identify and mitigate risks without compromising a child's right to privacy, access to information, social connections and learning opportunities? What have been the challenges? Have challenges been effectively resolved?
- On review of the approach or actual plans, are any learnings or improvements identified? If so, how are these going to be implemented in planning for future matters?

For Services particularly, consider how Quality Areas 2, children's health and safety, and 3, physical environment, applies.

Communication and Support

- How are staff supported to identify the need for and undertake risk assessment and development of a risk management plan?
- Are there a sufficient range of tools and processes in place to identify, monitor and mitigate risk?
- Are risk assessments and plans – especially controls and the people responsible for them – sufficiently communicated to all stakeholders? Give particular consideration to children and young people, staff and volunteers, other businesses, parents and carers.

Managing Breaches

- Is responsibility for risk assessment, planning and implementation of controls detailed in the performance expectations of relevant staff and volunteers?
- Have any failures in risk management been adequately reported?

10. Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines

Requirements

CYRMS **must** reference policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines. Communication and support requirements within the Regulations also require that CYRMS **must** detail how the School or Service provides training materials for persons engaged by the school, to help identify risks of harm and how to handle disclosures or suspicions of harm (noting connection to induction and training in section 9 of these Guidelines and Procedures).

Outcomes sought...

National Principles for a Child Safe Organisation:

6: Processes to respond to complaints and concerns are child focused.

United Nations Convention on the Rights of the Child:

Article 19: Children have the right to be protected from being hurt and mistreated, in body or mind.

Article 42: Children have the right to know their rights! Adults should know about these rights and help children learn about them, too.

Other Key Drivers

Child Protection Act 2000

As per section 13E of the Act, if a relevant person (e.g. education and care professionals, teachers and registered nurses) forms a reportable suspicion about a child in the course of the person's engagement as a relevant person, the person **must** give a written report to the Department of Child Safety, Youth and Women.

Education (General Provisions) Act 2006

As per sections 366 and 366A, a staff member of a school, who reasonably suspects in the course of their employment that a student under 18 or with a disability has been sexually abused or is likely to be sexually abused, **must** immediately provide a written report to the Principal or a Director of the School's governing body (or an appropriate delegate). Certain information must be included in this report. The Principal or Director/Delegate **must** immediately provide this report to the Police.

Education (Queensland College of Teachers) Act 2005

Schools (employing authorities) are obliged to inform the Queensland College of Teachers (QCT) about particular allegations:

- as soon as possible, after starting to deal with an allegation of harm or likely harm to a child due to the teacher's conduct - section 76
- after dealing with the allegation, QCT must also be informed of the outcome - section 77
- notification to QCT within 14 days if the school has dismissed a teacher in circumstances that call the teacher's competence to be employed as a teacher into question (regardless of if the matter has been reported or not under s76 or 77) - section 78

- A school must have written processes about how the school will:
 - respond to harm, or allegations of harm, to students under 18 years; and
 - the appropriate conduct of the school's staff and students.
- The processes **must** include a process for:
 - a) reporting by a student to a stated staff member of the conduct of another staff member that the student considers inappropriate; and
 - b) how the information reported to the staff member must be dealt with by that staff member.
 - c) reporting sexual abuse and likely sexual abuse as per the *Education (General Provisions) Act 2006* sections 366 and 366A
 - d) reporting a reportable suspicion under the *Child Protection Act 1999*, section 13E

For a) and b) there **must** be at least 2 stated staff members.

- The school must have a written complaints procedure to address allegations of non-compliance with the above written processes. The complaints procedure may form part of any other written procedure for dealing with complaints.
 - The School's governing body is required to ensure:
 - a) the school's staff and students, and students' parents and guardians, are made aware of the processes for the conduct of staff and students and responses to harm
 - b) the processes are readily accessible by staff, students, parents and guardians
 - c) staff are trained annually in implementing the processes
 - d) the school is implementing the processes
-

Education and Care Services National Law and Regulations 2011

Within regulated timeframes (varying from 24 hours to 7 days) the Approved Provider is required to notify the Regulatory Authority of:

- any circumstance arising at the service that poses a risk to the health, safety or wellbeing of a child attending the ECS
- any incident where the approved provider reasonably believes that physical abuse or sexual abuse of a child or children has occurred or is occurring while the child is being educated and cared for by the ECS
- allegations that physical or sexual abuse of a child has occurred or is occurring while the child is being educated and cared for by the ECS
- any complaint alleging the Education and Care Service National Law has been contravened
- any Serious Incidents that occurred or are alleged to have occurred

Regulations (section 183) also detail requirements for the storage of records and other documents.

Relevant Policies and Procedures

Student/child protection

- [Student Protection in Anglican Schools Policy and Procedures](#)
- [Child Protection in Anglican Education and Care Services Policy and Procedures](#)

Managing Breaches

- [Complaints Management in Anglican Schools Policy and Procedures](#)
- [Complaints Management in Anglican Education & Care Services Policy and Procedures](#)

Communication and Support

In addition to the detail provided in Section 9 about Induction and Training, Student/Child Protection Resource Sheets are provided to Schools and Services (Student Protection Officers and Nominated Supervisors) to assist in providing people engaged by the School or Service important information about harm to children and young people.

SUPPORTING FORMS

[SCHOOLS](#)

[EDUCATION AND CARE SERVICES](#)

OTHER ASC RESOURCES

[ECS GUIDE TO NOTIFICATIONS TO THE REGULATORY AUTHORITY](#)

[ECS CHILD PROTECTION GUIDE FOR PARENTS](#)

[SCHOOL'S STUDENT PROTECTION GUIDE FOR PARENTS AND STUDENTS](#)

[CHILDREN'S RESOURCE TEMPLATE: WE WANT CHILDREN TO FEEL SAFE AND WELL!](#)

[INDUCTION OVERVIEW FOR NEW STAFF AND VOLUNTEERS \(SCHOOLS AND ECS\)](#)

[ADDITIONAL RESOURCES \(SCHOOLS AND ECS\)](#)

Record Keeping

In addition to regulatory requirements, the ACSQ requires Schools and Services to maintain suitable record keeping as per the approved ACSQ Retention Schedule.

Also, the Royal Commission into Institutional Responses to Child Sexual Abuse recommended (8.4), all institutions that engage in child-related work should implement the following principles for records and recordkeeping, to a level that responds to the risk of child sexual abuse occurring within the institution.

- Principle 1: Creating and keeping full and accurate records relevant to child safety and wellbeing, is in the best interests of children and should be an integral part of institutional leadership, governance and culture.
- Principle 2: Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing.
- Principle 3: Records relevant to child safety and wellbeing should be maintained appropriately.
- Principle 4: Records relevant to child safety and wellbeing, should only be disposed of in accordance with law or policy.
- Principle 5: Individuals' existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent.

[RECORD RETENTION SCHEDULE](#)

POLICIES AND PROCEDURES REVIEW

Key areas for reflection in the 2020/21 review of Student Protection and Child Protection Policies and Procedures:

Based on Principle 6 for Child Safe Organisations:

- Do they prioritise the safety and wellbeing of children and young people and recognise the role of families and communities in understanding and using the policy?
- Do they demonstrate regard for fairness to all parties to a complaint or investigation including support and information as appropriate?
- Are the policies accessible, clearly outlining the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of matters, relevant breaches of policies or the Code of Conduct, and obligations to act and report?
- Are the processes detailed understandable for children and young people, families, staff and volunteers, are they culturally safe?
- Do they address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and co-operation with law enforcement?
- Are reporting, privacy and employment law obligations met?

Based on recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse:

(7.7) Do policy and procedures cover:

- a) Making a complaint
- b) Responding to a complaint
- c) Investigating a complaint
- d) Providing support and assistance
- e) Achieving systemic improvements following a complaint?

(13.6) Do policy and procedures sufficiently support the managing of complaints about children with harmful sexual behaviours?

(16.39) Relating to the management of actual or perceived conflicts of interest that may arise in relation to allegations of child abuse, does policy cover all individuals who have a role in responding to relevant complaints?

(16.51) Do policy and procedures require that, upon receiving a complaint of child abuse, an initial risk assessment is conducted to identify and minimise any risks to children?

Reflection: handling disclosures/suspensions of harm

Consider matters managed and how the School or Service demonstrate they were taken seriously and responded to promptly and thoroughly. For example:

- Were the immediate safety needs of all relevant children and young people responded to?
- Were sufficient actions taken to lessen the likelihood of occurrence into the future?
- Are there any themes and if so, can any strategies be put in place to help address these themes?
- Have issues that impact on the development and maintenance of a child safe culture been reported to the Head of School/School Council, or Nominated Supervisor/Management Committee, through quarterly reporting of the CYRM Committee?

For Services particularly, consider how Quality Areas 2, children's health and safety, 4, staffing arrangements 5, relationships with children, and 6, collaborative partnerships with families and communities, applies.

Communication and support

Consider the effectiveness of induction, training and information available to all persons engaged (see section 9 of these Guidelines).

Consider how children and young people are, or can be better informed about who to talk to if they are feeling unsafe and know what will happen? (also discussed in Section 5 of these Guidelines).

Managing breaches

Were matters managed according to policy and procedures? If not consider the root cause of this breach. Consider the effectiveness of performance, training and support. What actions are required to help prevent such breaches into the future?

11. Version Control

These Working with Children in Anglican Education Guidelines and Procedures are published by the Anglican Schools Commission (ASC). Should additional information or assistance be required, Schools and Services can contact the ASC's Child Safety and Wellbeing Advocate:

- Phone: 3835 2288
- Email: asc@anglicanchurchsq.org.au
- Website: ascqld.org

The Anglican Schools Commission is part of the Anglican Church Southern Queensland (The Corporation of the Synod of the Diocese of Brisbane ABN 32 025 287 736).

Version:	Date:	Document owner:	Comments:
V1.0	18/08/2020	Anglican Schools Commission	Approved by ASC, as delegated within the Working with Children in Anglican Education Policy.

12. Appendices

APPENDIX 1: ADVICE ON **SCREENING REQUIREMENTS** IN SCHOOLS AND EDUCATION & CARE SERVICES

APPENDIX 2: RECOMMENDED **TEMPLATE FOR CYRMS**. THIS INCLUDES A TEMPLATE FOR AN **ACTION PLAN**

APPENDIX 3: RECOMMENDED **TEMPLATE FOR A TERMS OF REFERENCE** FOR THE CYRM COMMITTEE

APPENDIX 4: RECOMMENDED **TEMPLATE FOR QUARTERLY REPORTING** BY THE CYRM COMMITTEE

APPENDIX 5: RECOMMENDED **CHECKLIST FOR ANNUAL REVIEW** OF THE CYRMS

APPENDIX 6: A TEMPLATE FOR HEADS/ NOMINATED SUPERVISOR **ANNUAL REPORTING** TO GOVERNING BODY (PENDING)

Appendix 1: Advice on screening requirements in Schools and Education & Care Services

Role types	Staff - a person who is employed by the school/service and carries out any work ¹ for a financial reward. E.g. full time, part time, casual or individually contracted persons.				Volunteers - a person who is employed by the school/service and does not carry out any work for financial reward ² .			Governing bodies	
	1. Staff who regularly conduct activities that mainly involve children (direct teaching, care or instruction)	2. Staff who conduct activities at that mainly involve children/conducting activities mainly involving children for short or seasonal periods	3. Staff who provide a service directed mainly to children	4. Staff who don't provide a service directed mainly to children or conduct activities mainly involving children	6. Volunteers who don't provide a service directed mainly to children or conduct activities mainly involving children	7. Volunteers who provide a service directed mainly children or are conducting activities mainly involving children	8. Volunteers providing child accommodation and their adult household members.	9. Members of School Council or ECS Management Committee	10. Members of School Governing Bodies or ECS Approved Providers
Level of supervision	Could be unsupervised for periods of time.	Could be unsupervised for periods of time.	Could be unsupervised for periods of time.	Role does not involve engagement with children but is located on school grounds.	Role does not involve engagement with children and is not unsupervised with children.	Could be unsupervised for periods of time.	Unsupervised.	Role does not involve engagement with children and is not unsupervised with children.	Role does not involve engagement with children and is not unsupervised with children.
Examples:	Teachers, tutors, teacher aides, educators, assistants, some coaches, instrumental music, health bay staff, counsellors.	Seasonal coaches, relief teachers, trainees.	Reception staff, canteen staff, some IT staff, cleaners who clean while students are there, grounds-people who provide a service while children are on the grounds.	Some administrative staff. Suggest a risk averse approach to this cohort, as a potential 'fringe' entry point.	P&F member, BBQ cook/server at community/sports event, archivist, covering library books.	Trainees and pre service teachers , other people (parents, grandparents etc.) engaged for applicable class activities, incursions and excursions, including camps.	Home stay or billeting.	Member of a School Council or ECS Management Committee.	For Schools or Services owned by ACSQ this is Diocesan Council.
Knowledge of people's contact with children and young people	Each Regulated Business (e.g. a Non-State School, ECS, or Child Accommodation Service) MUST have a Register (commonly known and a Working with Children or Blue Card Register) that records <u>all</u> persons engaged. For each role undertaken consider how the school or service has knowledge of and records these people's contact or likely contact with children and young people when they are undertaking their role. The school/service should be able to demonstrate who, when undertaking a role at the school/service, has or is likely to have had contact with children and young people and in what circumstances. This information should be used to accurately meet requirements detailed in this document.								
Restricted persons:	Every person engaged, or being considered to be engaged, by the school or service to work with children is not to commence, or immediately stop working in their role if they are, or become, a 'restricted person' under Working with Children legislation. This person and the School or Service may be committing offences under this legislation if a person works with children while meeting the definition of a restricted person. It does not matter if they are a staff member or volunteer, a parent of a child, under 18 years old, or if any other reason to not require a Working with Children Authority (Blue Card or Exemption Card) applies. A restricted person includes persons who: <ul style="list-style-type: none">• have had their Working with Children Check (application) declined (negative notice holders),• have had their Working with Children Authority (card) suspended,• are disqualified from applying for a Working with Children Authority, or• have been charged with a disqualifying offence and the proceedings have not ended. <i>If the School or Service has reason to suspect a person who they are considering engaging or have engaged in work with children is a restricted person, they must not engage them until this suspicion is sufficiently investigated and found to be incorrect.</i> <i>Schools and Services are to ensure they advise all persons they engage of this requirement.</i> <i>Schools and Services also need to have systems in place to appropriately manage information or allegations that indicates a reasonable suspicion that a person, who they have engaged, or it is reasonably foreseeable that they would engage (e.g. parent or student), may be a restricted person.</i>								

¹ It is immaterial if the agreement to carry our work is written or unwritten, the person's motivation, time engaged, for one occasion or ongoing, regular or irregular. The nature of the work is also immaterial. As defined in the Working with Children (Risk Management and Screening) Act 2000.

² Consistent with the definition in the Working with Children (Risk Management and Screening) Act 2000

<i>Working with Children Authority (WWCA)</i> <i>Aka: Blue Cards (either volunteer or paid), Exemption Cards and Positive Notices</i> Note: when a WWCA is required, it is required <i>prior</i> to commencement and person is required to be linked to the relevant Regulated Business or Employer through Blue Card Services	Not required for: <ul style="list-style-type: none">- Approved Teachers in Schools, including boarding facilities.- Registered Health Professionals providing a service directly related to their profession. Not required (although recommended) for work that is expected to be or is less than 8 days in a calendar year. Required in all other circumstance, including Teachers in ECS. Note: new staff who have previously held a volunteer WWCA must apply to transfer this to a paid card (penalties apply).	Required if the usual function of employment is undertaken in a boarding facility, or while children are being educated and cared for in an ECS premises - unless work is less than 8 days in a calendar year. Recommended in all circumstances given the nature of a School or Service regarding exposure to children or young people.	Not required for: <ul style="list-style-type: none">- Approved Teachers in Schools, including boarding facilities.- Registered Health Professionals providing a service directly related to their profession.- Volunteers under 18 years of age (unless they are a trainee/ pre-service teacher).		Not required for international students who have turned 18 years old, as this accommodation is described as temporary. See BCS resource on Home Stay . Required for all other adult household members where child is unrelated, and accommodation is expected to be or is for more than 7 days in a calendar year. Recommended for all adult household members in all circumstances, unless approval provided by the Head of School after careful consideration and before commencement.	As per column 6.	A WWCA is required as a Director of a Non-State School, or as a Director of a business operating a ECS.
			Required if undertaken in a boarding facility, or while children are being educated and cared for in an ECS premises, unless the person is a parent. Recommended in most circumstances, if able to be legally obtained, given the nature of a School or Service regarding contact with children or young people. Where this is not able to be obtained, alterative checks may be appropriate e.g. police checks.	Required unless: <ul style="list-style-type: none">• the person is a parent, or• engagement is expected to be or is not more than 7 days in a calendar year . Note: trainees/pre-service students do not need to be linked, however their WWCA should be sighted and details placed on the Register. Note: where activity is most closely related to a Club or Association, rather than the School or Service (e.g. a Swim Club where other children not enrolled at the School or Service can attend), parents require a WWCA if they are not providing services or conducting activities that are the same or similar to that being provided to their child. Note: where contact with children is unsupervised by a School or Service employee or involves overnight accommodation with an unrelated adult is involved a WWCA is recommended for all volunteers. Where this is not able to be obtained, alterative checks are recommended to be considered (e.g. police checks).			

<i>Approved Teacher: Teacher registration or permission to teach (Education (Queensland College of Teachers) Act)</i>	<p>QCT registration must be confirmed for all Teachers, and where possible, the Teacher should be linked to the School or Service. Where this is not possible, the Teacher’s registration is to be, at least, be confirmed on commencement, annually and where there has been a break in work with the School or Service for longer than 12 months.</p> <p>Only approved teachers may undertake the duties of a teacher in a Queensland school. Approved teachers include those registered or those approved to teach under Permission to teach (PTT) by the QCT. Duties of a teacher include the delivery and/or assessment of student participation in an educational program which is either based on the national curriculum developed and administered by the ACARA or is a syllabus developed, revised or purchased for a senior subject or P-10 subjects by the QCAA.</p> <p>Note: Some teachers may be employed in roles other than teaching) – for example a coach employed by the School, who is also a registered teacher. In certain circumstances, these teachers may still not require a Working with Children Authority (Blue Card). Where this occurs the person’s teacher registration or PTT should be used and consideration given to additional screening, such as Police history, based on an assessment of the risk posed to children and young people from this person.</p> <p>Registration can be confirmed with the Queensland College of Teachers: https://www.qct.edu.au/</p>			
<i>Registered Health Practitioners</i>	<p>Registered Health Practitioners who are performing activities or providing services related to their functions as a registered health practitioner do not require a WWCA. In these circumstances their registration should, at least, be confirmed on commencement, annually and where there has been a break in work with the School or Service for longer than 12 months.</p> <p>Registration can be confirmed with the Australian Health Practitioner’s Registration Authority: https://www.ahpra.gov.au/</p>			
<i>National Police Check and International Criminal History Check</i>	<p>Working with Children Checks can detect only a subset of people who are unsuitable to work with children, and these checks should be seen as only one part of a suit of screening practices.</p> <p>Where a WWCA is not required and is recommended, but:</p> <ul style="list-style-type: none">- A WWCA not able to be obtained, or- A WWCA is limited in nature because the person has lived overseas for a period of six consecutive months or more as an adult <p>Strongly consider supporting prospective staff and volunteers to seek and provide a Police and/or international criminal history check prior to their engagement.</p> <p>National Police Certificates can be obtained through the Queensland Police Service (online application is facilitated by Australia Post). These Certificates are a document that lists an individual's disclosable court outcomes and pending charges sourced from the databases of all Australian police jurisdictions. This includes traffic and non-police prosecuted matters for the previous 10 years. Convictions, such as spent or certain juvenile convictions, may not be disclosed on a NPC in accordance with the legislation and policies of the various police jurisdictions. National Police Certificates are commonly used for employment purposes.</p> <p>https://www.police.qld.gov.au/documents-for-purchase/national-police-certificates https://smarteform.auspost.com.au/aponlineforms/servlet/SmartForm.html?formCode=QNPC</p> <p>International criminal history suppliers include: Fit 2 Work from Equifax: https://www.equifax.com.au/fit2work/, or AIS International: https://aisintl.com.au/</p> <p>Note: for Health Professionals AHPRA registration includes consideration of the outcomes of international criminal history checks where such history has been declared by the professional, OR the professional has lived overseas for a period of six consecutive months or more as an adult.</p>			
<i>Anglican Church’s National Professional Standards check</i> <i>Note: this check is limited to persons who have been placed on the Anglican Church’s Professional Standards Register due to their conduct in an Anglican organisation in Australia.</i>	<p>Outcome must be considered by Head of School (or Service equivalent) prior to making a formal offer of employment (usual turnaround is 1 to 3 days).</p> <p>Requests for checks are to be sent to the National Register Check Mailbox, managed by the ACSQ Office of the Director of Professional Standards: nationalregistercheck@anglicanchurchsq.org.au</p>	<p>Recommended for roles who have unsupervised contact with children and engagement is expected to be 7 days or more in a calendar year.</p>	<p>Required for all prospective school council members or ECS management committee members where the School is owned by/subsidiary of the ACSQ, or where ACSQ is the approved provider of the Service.</p> <p>For owned schools this is managed by the Anglican Schools Commission.</p>	<p>Required.</p>

<p><i>Referee checks</i></p> <p><i>See section 7 of the Working with Children in Anglican Education Guidelines for further advice.</i></p>	<p>For staff consider all places where the applicant has worked with children - especially the last 5 years. Is the applicant able to nominate referees from each place of employment, who were in a line management position to the applicant?</p>	<p>For volunteers, particularly home stay hosts and any other role having significant contact with children and young people (such as unsupervised), seek, at least, two personal referee checks, and consider the nominated referee’s suitability.</p>	<p>Required for all prospective school council members where the School is owned by/ subsidiary of the ACSQ.</p> <p>For owned schools this is managed by the Anglican Schools Commission.</p>	<p>Required.</p>
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Appendix 5

Recruitment and Selection in Anglican Schools

Related Documents:

☐ Policy

☐ Form

☒ Other Document

Policy

1. POLICY STATEMENT

Through implementing this Policy, Anglican Schools demonstrate their commitment to an equitable, transparent, consistent and merit based approach to recruitment and selection, in order to attract, select, and retain the most capable and suitable people.

All recruitment and selection processes, at all stages of vacancy, applications and short-listing, screening and selection, and appointment, will reflect this commitment.

This policy is a key component of each School's Child and Youth Risk Management Strategy (CYRMS), supporting the legislative requirements of the *Working with Children (Risk Management and Screening) Act 2000* and *Working with Children (Risk Management and Screening) Regulation 2011*. CYRMS are required to detail procedures for recruiting, selecting, training and managing persons engaged or proposed to be engaged by the school, as related to the safety and wellbeing of children and the protection of children from harm.

Creating a safe and supportive environment for students is a shared and ongoing responsibility for all school employees and effective recruitment and selection enables a preventative approach to child safety.

2. SCOPE

This Policy, developed by the Anglican Schools Commission and approved by Diocesan Council, applies to all Anglican Schools in the Diocese of Brisbane and any business associated with the School, including international colleges, with the exception of Education and Care Services.

Other Anglican Schools in Queensland have approval to use this Policy.

This Policy applies to all positions appointed by the School. This policy informs and directs the process of employing teaching and non-teaching staff.

3. GUIDING PRINCIPLES

Anglican Schools are committed to recruiting, supporting, developing and retaining people of the highest calibre based on merit. This calls for an equitable, competitive and timely recruitment and staff selection process. Schools seek to –

- Maintain the principle of selection on the basis of merit to appoint the best candidate/s
- Emphasise child safety and wellbeing
- Provide equal opportunity for all candidates
- Represent in its staffing profile the community it serves
- Ensure that selection procedures are efficient and effective
- Maintain candidate confidentiality

4. SPECIFIC RECRUITMENT AND SELECTION PROCESS REQUIREMENTS

Anglican Schools will manage recruitment and selection for both continuing and fixed term staff appointments in accordance with the following four stage process:

- 1) Vacancy management
- 2) Application process including short listing
- 3) Screening and selection
- 4) Appointment

4.1 Vacancy management

Vacancy management is the preparation stage of the recruitment process. The following key points relate to this stage:

- The Principal or their delegate will authorise any request to recruit prior to advertising, including a suitable information package.

The information package emphasises requirements and expectations of the position; reflect [insert name of school here] commitment to and responsibilities for child safety and wellbeing; and encourage suitable applicants.

- A position description, including a statement of duties and selection criteria must be developed or updated for any vacant position that is authorised to be filled. This is an essential part of the information package as it informs candidates about the school's expectations and is the key to making an equitable selection, based on merit against clearly defined requirements.

This position description will include information detailing the duties and tasks of the role, required and desired qualifications, experiences and attributes of the applicant, information about the level of responsibility and supervision associated with the position and related expectations.

- Our Commitment: Creating environments for children and young people to thrive, a Code of Conduct for Anglican Schools and Education & Care Services (the Code of Conduct), is also a key part of the information package, where candidates are instructed to read and reflect their agreement as part of any subsequent application.
- Generally vacancies will be advertised as a minimum internally by way of an email to 'All Staff' by the HR representative, Principal or their delegate. External vacancies will be advertised on the School's website as a minimum.

There are times when a vacancy may be exempt from being advertised; this decision is at the discretion of the Principal. Examples of such situations may include, but are not limited to:

- When a full recruitment process has been completed and a suitable candidate has not been identified. Suitable candidates may be approached in these circumstances;
- Where a recruitment agency is appointed;
- Where the vacancy is for less than a semester;
- When an appointment is required as a matter of urgency e.g. resignation or illness;
- Where there is a suitable candidate within the school who needs to be redeployed to avoid redundancy;
- Where an employee is in a fixed term contract or casual basis and there is evidence to support a high level of performance in the role, the employee may be reappointed to the same role at the end of the term;
- Where an employee is working at the same level and is willing to take on the additional hours;
- Where an employee is seconded to a role on a fixed term based on their specialised skills or experience.

4.2 Application process, including short listing

The application process, including short listing, identifies potentially suitable candidates. The following key points relate directly to this stage –

- Anglican Schools seek to treat all candidates equitably, with respect and courtesy. This includes where possible acknowledging receipt of job applications and advising unsuccessful candidates as soon as reasonably practicable.

- Applications are treated with confidentiality at all times. As such applications will be stored securely, applications will not be sent via internal mail or be left in areas which are accessible to people other than those they are intended. Discussions in relation to the talent pool should be limited to the selection panel. Breaches of confidentiality will be treated seriously.
- A selection panel will assess candidates against established selection criteria to ensure objectivity and avoid bias in all stages of the selection process. As a general guide the selection panel will include no fewer than two people and no more than four persons. An external consultant maybe invited to be part of the selection panel. All members of the selection panel will be invited to participate in all stages of the recruitment process.
- At any stage of the recruitment process if a member of the selection panel becomes aware of a potential conflict of interest they are to discuss this with the HR representative where applicable or the Principal without delay.
- Internal candidates are welcome to apply for any vacancy for which they are suitably qualified. Such applications will be shortlisted alongside all other applications and treated in a consistent manner. Internal candidates not shortlisted for an interview will be contacted and advised and be provided with relevant feedback. Such feedback should be factual, unbiased and delivered in a courteous and sensitive manner.
- Family members and friends of staff of [insert name of school here] may apply for an advertised position and these applications will be processed in line with all applications. In the situation where there is a perceived and/or real potential for a conflict of interest, such applications will need to be considered carefully. In the interest of transparency and fairness to all it is appropriate that a perceived conflict of interest should be brought to the Principal's attention. It is important to note that in all cases, final recruitment decisions will be based on merit.
- International candidates will provide to the panel relevant Visa documentation supporting their right to live and work in Australia. This information will be verified with the Department of Immigration and Border Protection. Under no circumstances will a candidate be appointed to any position at [insert name of school here] if they do not have the right to live and work in Australia.
- Recruitment and selection agencies may be engaged, with the approval of the Principal.

4.3 Screening and Selection

The screening and selection process seeks to identify the most suitable candidate based on merit. The following key points relate directly to this stage:

- Recruitment methods will be consistent for all applicants. For example, this may include the use of an interview guide which relates directly to the candidates motivation and the selection criteria for the role. All other recruitment tools should also be used consistently. Such tools must be free from unlawful discrimination.
- Accurate notes will be taken at all stages of the recruitment process and securely stored.
- Feedback will not be routinely offered to external candidates. At the discretion of the Principal, feedback may be offered if specifically requested by an external candidate.
- Relevant performance feedback will be gathered in relation to an internal candidate prior to any final decisions on their application are made.
- Process and plans should be established for the handling of unsuccessful internal candidates to encourage a positive culture and working environment for both the unsuccessful and successful candidates.

4.3.1 Selection Criteria

- The selection criteria assists in identifying the key skills, attributes, experience and qualifications that are required to undertake the duties of the position.
- While assessing a candidate's suitability for the role, consideration will also be placed on a candidate's understanding and commitment to the Code of Conduct, especially how it applies to the safety and wellbeing of children attending [insert name of school here]. Including this as part of the selection criteria assists in engaging staff that will contribute to creating a safe and supportive environment.

4.3.2 Screening

- Screening and selection of staff is undertaken by a selection panel appointed by the Principal or their delegate. The panel members must have a sufficient understanding on how to dispense their obligations appropriately and effectively, including identifying indicators that suggest a person is unsuitable to work with children.
- The following screening checks apply:
 - Current Teacher Registration (Queensland) is mandatory for teaching staff. At every interview this criteria will be verified. If this criteria is not met, under no circumstances will a candidate be progressed.
 - Non-teaching staff are required to possess or be eligible for the issue of a positive notice and blue card (Working with Children Check). At every interview this criteria will be verified and if this is not suitably met, under no circumstances will a candidate be progressed.
 - All preferred applicant's (including teachers) details are to be provided to the Director of Professional Standards (DPS), Anglican Church Southern Queensland to be checked against the Anglican Church's National Professional Standards Register. The Principal must consider the result of this check prior to making a formal offer of employment.
 - The above checks are to be complemented by checking the applicant's identity. This includes the verification of consistency with items such as qualifications. This check may include sighting copies of name change documentation such as marriage certifications.
- As identified within s4.13 and 4.14 of the Code of Conduct, if at any time during the recruitment process, information is received that an applicant;
 - is currently charged with or convicted of an offence against a child;
 - has been acquitted of a charge of an offence against a child;
 - has had a charge of an offence against a child not proceed;
 - has had a prohibited status under applicable 'working with children' screening legislation lifted; or
 - has been the subject of any disciplinary proceedings involving child abuse;

The Principal must ensure the following occurs:

- consultation with relevant people (as detailed in the Code of Conduct);
- a documented risk assessment; and
- determination that no child will be at an increased risk of harm from this appointment.

4.3.3 Interview

- Selection panels should only ask questions related to the requirements and context of the position.

- Selection panels have discretion in the relative weighting of selection criteria as per the position description, relevant behaviours demonstrated through the recruitment process, the cultural fit, the judgment of the merits of candidates against the position description and in the assessment of potential or ability to perform other duties. All decisions will be made objectively citing relevant evidence.
- Conducting interviews with short-listed candidates by the selection panel is essential. In addition, the panel will consider other relevant recruitment activities. This may include, for example, work assessment tests, job-related medical assessment, on the job observations, psychometric testing and simulation activities. Reference checks are to be undertaken as a key component of the selection process before reaching a final decision. Interviews may be exempt in the following situations:
 - where there is only one candidate and the candidate's abilities and attributes are well known and evidenced by the selection panel, or
 - where all applicants are internal and there is strong, highly reliable evidence to demonstrate why a candidate is suitable above all others. In this situation this information should be delivered to all candidates in a sensitive and courteous manner.
- Conducting structured interviews with short listed candidates also provides insight into the applicant's attitudes, values and understanding of professional boundaries and accountability. This is important in assessing their suitability to work in a school environment. Use interviews to consider how the applicant's values and attitudes complement the School's focus on child safety and wellbeing. Important areas to address during the interview process are:
 - motivation to work in the School
 - understanding of children's development and needs
 - values and attitudes towards children, including attitudes to children's rights and how they can be upheld
 - understanding of professional boundaries
 - reasons for leaving current or previous job

4.3.4 Reference Checks

- A minimum of two reference checks will be conducted on preferred applicant/s after the interview process. Reference checks are to be conducted by a nominated member of the selection panel, however it is preferable for the supervising manager of the vacant position or HR representative to conduct the reference checks, if possible.
- These checks can be conducted either in person or over the telephone. As a minimum, whenever possible a check should be conducted with the preferred candidate's current and/or immediate past supervisor. Reference checks must be conducted on a confidential basis.
- Verifying the identity of the referee is necessary, as to gauge the legitimacy of their response. If the reference is in writing, directly contact the referee to confirm authenticity.
- In contacting the referee seek information about:
 - the specifics of the relationship between the referee and the applicant (positions, length of time, nature (e.g. direct supervision)
 - knowledge of the applicants work or interactions with children and families, including feedback on any observations
 - opinion on the applicant's suitability for the position and context (school), including any concerns about the applicant's attitudes or conduct
- It is not unreasonable to expect that the Principal may contact a fellow Principal at another school to discuss the candidate. Any decision to contact a referee not listed on

the candidate's resume is at the discretion of the Principal. However, note that in doing so, the Australian Privacy Principles (APPs) are to be considered and taken into account, during any discussions relating to the candidate. This is particularly significant for any discussions undertaken with those outside of the Diocesan owned School network.

- During the reference check process accurate notes must be taken for all referees. Where the referee is located outside of Australia a reference check form can be emailed to the referee to be completed and returned.

4.4 Appointment

The appointment process is the final approval and appointment of the most suited candidate based on merit. The following principles relate directly to this stage:

- The final decision of appointment rests with the Principal. To this end no recruitment decision should be finalised or verbal offer made without the Principal's final approval; this may include a second interview with the Principal. The Principal may choose to delegate this responsibility.
- The Principal or their representative will sign an offer of appointment letter. Unsuccessful short-listed candidates will be dealt with courteously and sensitively.
- All new staff must undergo a minimum period of six months as a probationary period.

5. ADDITIONAL REQUIREMENTS

5.1 Privacy

Anglican Schools are committed to protecting the privacy of individuals and are bound by the Australian Privacy Principles set out in the *Privacy Act 1988*. A candidate's CV and academic transcripts are personal information and Schools must only collect, use or disclose personal information in accordance with the Act and the School's Privacy Policy.

5.2 Document retention

All documentation relating to applicants and the recruitment process and approvals should be retained as outlined within the 2018 Records Retention Schedule for Anglican Schools in the Diocese of Brisbane.

5.3 Review of recruitment decisions

Any concerns about the recruitment and selection process should be referred in the first instance to the hiring manager or the Human Resource (HR) representative if applicable. If the HR representative is unable to resolve the issues, or requires advice or assistance, the matter is to be referred to the Principal or their representative. Alternatively, written complaints may be submitted to the Principal.

6. RELEVANT LEGISLATION, CANON AND RELATED DOCUMENTS

Federal legislation

- *Age Discrimination Act 2004*
- *Disability Discrimination Act 1992*
- *Workplace Gender Equality Act 2012*
- *Australian Human Rights Commission Act 1986*
- *Australian Human Rights Commission Regulations 1989*
- *Racial Discrimination Act 1975*
- *Sex Discrimination Act 1984*
- *Fair Work Act 2009*
- *Privacy Act 1988 including Australian Privacy Principles (APPs)*

Queensland legislation

- *Anti-Discrimination Act 1991*
- *Working with Children (Risk Management and Screening) Act 2000*
- *Working with Children (Risk Management and Screening) Regulation 2011*
- *Education (Queensland College of Teachers) Act 2005*

Canon

- *Diocesan Governance Canon (Brisbane Diocese)*
- *Professional Standards Canon (Anglican Church of Australia)*

Related policy and other documents

- *Our Commitment: creating environments for children and young people to thrive, a Code of Conduct for Anglican Schools and Education & Care Services.*
- *Diocesan Bullying, Harassment and Discrimination Policy and Procedures*
- *Complaints Management in Anglican Schools Policy and Procedures*
- *Anglican Schools Commission Privacy Policy*
- *Student Protection in Anglican Schools Policy and Procedures*
- *2018 Records Retention Schedule for Anglican Schools in the Diocese of Brisbane*
- *The School's Child and Youth Risk Management Strategy*

Related forms

- *Position Description template*
- *Recruitment Approval form*
- *Reference check form*
- *Working with Children check forms:*
- *Blue Card application form;*
- *Authorisation to confirm a valid card / application form;*
- *Volunteer to paid transfer form*
- *Letters of Employment*
- *New Employee pack*

7. DEFINITIONS/ABBREVIATIONS

Transparent:	Processes that are clearly defined, easily understood and easily accessible.
Consistent:	All candidates are treated in a similar way.
Merit:	Merit is the extent to which an applicant demonstrates they have abilities, aptitude, skills, qualifications, knowledge, experience and personal qualities relevant to carrying out the core duties of the role.
Equitable:	Recruitment without hidden or apparent bias on the grounds of gender, relationship status, pregnancy, parental status, breastfeeding, age, race, impairment, political belief or activity, trade union activity, lawful sexual activity, gender identity, sexuality and family responsibilities or association with, or relation to, a person identified on the basis of any of the above attributes.
Internal candidate:	A person who at the time of the recruitment process is employed by the Anglican School with the vacant position.
External candidate:	A candidate who at the time of recruitment is not employed by the Anglican School with the vacant position.
Conflict of Interest:	<p>A situation where an individual has a personal connection with a candidate which may influence their judgment.</p> <p>A conflict of interest is a situation in which someone in a position of trust has competing professional or personal interests. A conflict may exist even if no unethical or improper acts result. A conflict can create an appearance of impropriety that can undermine confidence in the person or the School.</p>
Blue Card:	Suitability card to work with children and young people. Issued after a Working with Children Check has been approved. A positive notice letter and a Blue Card will be issued.
SLT:	Senior Leadership Team.

8. POLICY REVIEW

The Anglican Schools Commission, in consultation with schools, will review this Policy and Procedures biannually, or as required.

Appendix 6

Forms

DOWNLOAD A FILLABLE COPY OF THIS FORM HERE

SECTION 1 – ADMINISTRATION

A. FORM ADMINISTRATION

Date Commenced	Click to enter a date.
School or Service	Choose an item.
Name of School or Service	
Name of Staff Member commencing Form	
Name of Primary Person assisting Staff Member	
Role of Primary Person assisting Staff Member	Choose an item.
	If you selected "other" please enter text here.

Date	Created, amended or completed by <i>Insert full name</i>	Role at School or Service	Brief rationale
Click to enter a date.			
Click to enter a date.			
Click to enter a date.			
Click to enter a date.			
Click to enter a date.			
Click to enter a date.			
Click to enter a date.			

B. CONCERN TYPE

Type of concerns <i>(more than one may apply):</i>	Relevant environments <i>(more than one may apply):</i>
<input type="checkbox"/> Sexual <input type="checkbox"/> Physical <input type="checkbox"/> Emotional/Psychological <input type="checkbox"/> Neglect	<input type="checkbox"/> Home <input type="checkbox"/> School or Service (possible inappropriate behaviour by adult) <input type="checkbox"/> School or Service (possible inappropriate behaviour by child) <input type="checkbox"/> Online <input type="checkbox"/> Community (i.e. not in home, school or online) <i>Please describe: Click here to enter text.</i> <input type="checkbox"/> Unknown

C. LIST ANY ATTACHMENTS OR KEY RELATED DOCUMENTS

Document	Location

D. COMMENTS (OPTIONAL)

Comments (optional)	
------------------------	--

SECTION 2 – RELEVANT PERSONS

E. DETAILS OF RELEVANT PERSONS

Details of Children/Young People directly involved:

- Role is usually 'subject child' or (when over 18 years) 'subject young person'.
- For children and young people suspected of abuse, causing harm or acting inappropriately role is 'possible responsible person'.
- In some matters both the above may apply to the one child or young person.

Name	Age	Sex	Role	Comments (Optional)

Details of Adults to whom concerns directly relate:

Include persons suspected of abuse, causing harm or acting inappropriately as a 'possible responsible person' as well as known relationship to the subject child/young person (e.g. mother)

Name	Age	Sex	Role	Comments (Optional)

List of all persons who provided information about the concerns or other relevant information recorded in this form:

Warning: this information may require legal advice prior to being shared in circumstances outside of reporting to Child Safety or Police, e.g. FOI request or subpoena, with regards to s186 of the Child Protection Act 1999.

Name	Role

Details of other people who may be able to give information about the concern:

Name	Age	Sex	Role	Comments

SECTION 3 – CONCERNS AND RELEVANT INFORMATION

F. DETAILS OF CONCERN RAISED

Include any information known about how staff at the School/Service became aware of the concerns; and the basis of the concerns, including details of the concerns such as, where available:

- any abuse/suspected abuse
- harm/risk of harm
- indicators there is not a parent able or willing to protect a child from harm

Concern first identified by:	Concern:

Other Relevant Information

Include any known strengths, supports or other protective factors; as well as contextual information that may inform the management of the concerns.

Information provided by:	Information

SECTION 4 – STATUTORY REPORTING

G. REPORT TO CHILD SAFETY

A report to Child Safety is made when there is a reasonable suspicion a child is in need of protection.

Has a report been made to Child Safety by a staff person of the School / Service?

☐ No

Is there a need for the School or Service to report to another statutory authority?

e.g. Police, Queensland College of Teachers and/or Department of Education (ECS)

Yes - Go to H (Contact Details)

☒ Yes

If selected **Yes**, please note:

- online report made here: <https://secure.communities.qld.gov.au/cbir/ChildSafety#>
- written (e.g. online) report always required if related to physical and sexual abuse
- written report to include known information about:
 - o the name, age, sex and contact details of the child
 - o basis for reasonable suspicion a child may be in need of protection, including details of harm which the report relates
 - o the identity of the person/s suspected of causing harm
 - o the identity of any other person who may be able to provide relevant information
- it is appropriate for all staff who contributed to a report and named to Child Safety to be listed as Notifiers
- attach/save alongside written report to this Protection Form and not it in section C above
- See: [Key Contacts](#) for Child Safety contact details
- Type of report:
 - o Mandatory report (physical and sexual abuse as per section 13E of the *Child Protection Act 1999*), or
 - o Other report (as per section 13A of the *Child Protection Act 1999*)

Type of report? (only one will apply)

- ☐ Mandatory report (physical and sexual abuse as per section 13E of the *Child Protection Act 1999*), or
- ☐ Other report (as per section 13A of the *Child Protection Act 1999*)

How was the report made? (only one will apply)

- ☐ Written / Online
- ☐ Phone
- ☐ Both – Written/Online & Phone
- ☐ Other Please describe: [Click here to enter text.](#)

Person/s who made the report (warning this information may require legal advice prior to being shared in circumstances outside of reporting to Child Safety or Police, e.g. FOI request or subpoena, with regards to s186 of the *Child Protection Act 1999*):

Name	Role	Workplace email	Workplace phone

Is there a need for the School or Service to report to another statutory authority?

e.g. Police, Queensland College of Teachers and/or Department of Education (ECS)

Yes - Go to H (Contact Details)

H. CONTACT DETAILS

Please refer to Section 2 of this form for a list of all relevant persons.

#	Child/ young person's name	Role	Primary Address	Phone	List parent/guardian and emergency contact details					
					#	Name	Role	Phone	Address	Comments
1					1					
					2					
					3					
2					1					
					2					
					3					
3					1					
					2					
					3					
4					1					
					2					
					3					
5					1					
					2					
					3					

Contact Details for Relevant Adults:

Note: Where the adult is a staff member who is not a 'possible responsible person' contact details can be limited to their workplace contact details.

Name	Role	Known Contact Details

I. ACTION REQUIRED FOR REASONABLE SUSPICIONS OF SEXUAL ABUSE OR LIKELY SEXUAL ABUSE

Protection Form (and relevant attachments) provided to Principal (School) or Nominated Supervisor (Service) or Governing Body's Delegate:

Provided by Whom:

Provided to Whom:

Date:

Click to enter a date.

Evidence (e.g. email):

Protection Form (and relevant attachments) provided by Principal (School) or Nominated Supervisor (Service) or Governing Body's Delegate to POLICE:

Name of person who made report:

Police Contact details:

Date:

Click to enter a date.

Evidence (e.g. email):

Note:

[Key Contacts](#) for Police telephone numbers and email addresses.

Confirmed all adult persons who identified a concern regarding a belief of a child sexual offence committed by an adult have been informed by the Principal or Nominated Supervisor (or Governing Body's Delegate) that the matter has been reported to the Police.

Who Informed	When Informed	How Informed
	Click to enter a date.	
	Click to enter a date.	

<p>Was the concern identified by the Principal (i.e. are they the staff member first raising the concern, or the first receiving the concern from another (non-staff) person)?</p> <p><i>If yes, immediately provide a copy of this Protection Form to governing body's delegate (see Appendix C of the Policy)</i></p>	Choose an item.
Provided to (Name):	
Email Address:	
Date:	Click to enter a date.
Evidence (e.g. email)	
Comments	

J. EDUCATION AND CARE SERVICES ONLY (E.G. LONG DAY CARE, KINDY, PREPREP, OHSC, VACATION CARE)

Do the concerns relate to an Education and Care Service?		Choose an item.	
If Yes, is the matter potential reportable to the Department of Education as the regulatory authority?		Choose an item.	
If Yes or Unknown, does the matter relate to a complaint or communication that could be perceived as a complaint?		Choose an item.	
If Yes, attach a copy of any written complaints and complete the below section.			
Time & Date Complaint Received	Name of Complainant	Role	Known Contact Details
Click to enter a date.			
Click to enter a date.			

If the matter relates to an incident or alleged incident at a Service, please provide the date and time this occurred/allegedly occurred:	Click to enter a date.
Immediately provide Protection Form to Approved Provider (or Delegate). <i>This is usually done by the Nominated Supervisor.</i>	
Provided by whom:	
Provided to whom:	
Date and Time provided to Approved Provider (or Delegate):	Click to enter a date.
Evidence (e.g. email):	

K. ADDITIONAL REPORTING

Is additional reporting to a statutory agency to be made? <i>E.g. additional reporting to Police (i.e. not related to sexual abuse), Queensland College of Teachers or The Australian Health Practitioner Regulation Agency.</i>	
Response:	Choose an item.
Comments:	

If **Yes** selected above, please complete the below table.

Date	To Whom:		By Whom:		Reporting reason and any additional comments
	Agency	Contact Details	Name	Role	

SECTION 5 – FURTHER ACTIONS

L. INAPPROPRIATE BEHAVIOUR OR OTHER STRATEGIC RISK

Do the concerns relate to:

- The potential or alleged inappropriate behaviour by a past or current staff member or volunteer; **OR**
- Additional matters with a potentially significant impact on the strategic operation of the School or Service?

☐ **Yes** – Please complete this section.

☐ **No** – Please proceed to next question.

Date and time concerns brought to the attention of the Principal (Schools) or Nominated Supervisor (Services): <i>Please note concerns related to a Principal or Nominated Supervisor are to be provided directly to the delegate of the School/Service's governing body (see Appendix C of Policy).</i>	Click to enter a date. Insert time:
Provided by:	
Provided to:	
Evidence (e.g. email etc.):	
Date and time concerns reported by Principal or Nominated Supervisor to delegate of the School/Service's governing body: <i>See Appendix C of the Policy.</i>	Click to enter a date. Insert time
Provided by:	
Provided to:	
Evidence (e.g. email etc.):	

M. UNDERTAKE AN IMMEDIATE RISK ASSESSMENT

Comments: <i>See Guidelines and Procedures (e.g. section 9 and 10)</i>	
--	--

List any action, reasonable in the circumstances, to be taken by the school or service to reduce risk of harm to a child or young person.

Action:	Completed or Planned?	Date Completed Planned by.	Person Responsible	Comments
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		

N. COMMUNICATION & SUPPORT

See Guidelines and Procedures (e.g. section 12).

Name of staff member responsible for liaising with the child/young person:	Name of child/young person:	Comments

Communication and support Action:	Completed or Planned?	Date Completed Planned by.	Person Responsible	Comments
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		

O. ADDITIONAL ACTIONS

Summarise any additional actions, relevant to the management of the concerns.

Action:	Completed or Planned?	Date Completed Planned by.	Person Responsible	Comments
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		
	Choose an item.	Click to enter a date.		

SECTION 6 – FORM COMPLETION

Form Completed On:	Click to enter a date.
Form Completed By:	
Form reviewed and approved by the Headmaster?	Choose an item.
	Click to enter a date.
Form saved and filed to:	
Form saved and filed by:	
Comments (optional):	

END OF PROTECTION FORM

To be completed by the staff member, in consultation with an SPO or the Headmaster, immediately after becoming aware of suspected harm. The completed form is to be provided to the Headmaster.

Date of record

--

Staff member reporting

Given name/s		Surname	
Position			

Details of student/s involved

Student

Given name/s		Surname	
Gender		Culture	If other, please specify
Age		DOB	Disability <input type="checkbox"/> Yes <input type="checkbox"/> No Please specify
Current court order		If other, please specify	

Family details

Parent 1

Given name/s		Surname	
Mobile		Email	

Parent 2

Given name/s		Surname	
Mobile		Email	

Details of suspected harm or concerning behaviour

Date/s of incident/s		

Information about suspected harm or concerning behaviour

--

Other individuals who have information about the suspected harm or concerning behaviour

Child Protection Guide used to support decision (for matters related to suspected harm)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Recommended action		<input type="checkbox"/> Copy of summary attached
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Person alleged to be responsible for the suspected harm or concerning behaviour

Name		Relationship to child	
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Additional Information

Actions taken

Details of action taken

Signature of staff member/volunteer

Date

Signature of Headmaster

Date

This template is to be completed for notification of complaints alleging that the law has been breached or that a serious incident has occurred or is occurring (s174 of the *Education and Care Services National Law Act 2010*).

Please submit this form, along with any required documentation, to the ECS Approved Provider. Where the Corporation of the Synod of the Diocese of Brisbane is the Approved Provider, submit the form and documents to ecs@anglicanchurchsq.org.au

PART A: Approved service details

Name of Approved Service			
Approved Service Number	SE-		

PART B: Type of notification

<input type="checkbox"/>	Complaints alleging that the law has been contravened
--------------------------	--

Complainant's details			
First name		Surname	
Email			
Phone number		Mobile	

Details of child/children			
First name		Last name	
DOB		Gender	

Complaint details	
Date received	
Copy of written complaint (or written summary) and any other relevant documentation (including correspondence, photographs, statements, etc)	
Steps taken / actions planned by service in response to the complaint.	

<input type="checkbox"/>	Complaints alleging that a serious incident has occurred or is occurring
--------------------------	---

Complainant's details			
First name		Surname	
Email			
Phone number		Mobile	

Details of child/children			
First name		Last name	
DOB		Gender	

Complaint details	
Date received	

Copy of written complaint (or written summary) and any other relevant documentation (including correspondence, photographs, statements, etc)

Steps taken / actions planned by service in response to the complaint.

PART C – Notifier details

Please provide your details:

Note – this will be the person whom the Approved Provider and/or Regulatory Authority will contact for questions relating to this notification.

First name		Surname	
Position		Email	
Work phone		Mobile	

Submitting this form

Please submit this form along with any required documentation to the ECS Approved Provider. Where the Corporation of the Synod of the Diocese of Brisbane is the Approved Provider, submit the form and documents to ecs@anglicanchurchsq.org.au.

Additional information attached	<input type="checkbox"/> Yes <input type="checkbox"/> No	List attachments	
---------------------------------	--	------------------	--

Signature of Nominated Supervisor	
Date	

This template is to be completed for notification of incidents. (As per Regulations 12 and 175)

Please submit this form, along with any required documentation, to the ECS Approved Provider. Where the Corporation of the Synod of the Diocese of Brisbane is the Approved Provider, submit the form and documents to ecs@anglicanchurchsq.org.au

PART A: Approved Service details

Name of Approved Service		
Approved Service Number	SE-	

PART B: Details of child (if more than one child, record details in 'further details of the incident' section)

First name		Last name	
DOB		Gender	

PART C: Incident date and time

Incident date		Incident time	
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PART D: Serious incident type

Select serious incident type then progress to corresponding question (select one only). If more than one serious incident type, please select the most serious eg. if a child is injured and an ambulance attends the service, select injury or trauma.

<input type="checkbox"/>	Injury or trauma (Reg. 12) Any incident involving serious injury or trauma to a child occurring while that child is being educated and cared for by an education and care service which a reasonable person would consider required urgent medical attention from a registered medical practitioner; or for which the child attended, or ought reasonably to have attended a hospital. Go to Part E - 1
<input type="checkbox"/>	Illness (Reg. 12) Any incident involving serious illness of a child occurring while that child is being educated and cared for by an education and care service, for which the child attended, or ought reasonably to have attended, a hospital. Go to Part E - 2
<input type="checkbox"/>	Child missing (Reg. 12) Any circumstances where a child being educated and cared for by an education and care service appears to be missing or cannot be accounted for. Go to Part E - 3
<input type="checkbox"/>	Child taken or removed (Reg. 12) Any circumstances where a child being educated and cared for by an education and care service appears to have been taken or removed from the education and care service premises in a manner that contravenes the National Regulations. Go to Part E - 4
<input type="checkbox"/>	Child locked in or out (Reg. 12) Any circumstance where a child being educated and cared for by an education and care service is mistakenly locked in or locked out of the education and care service premises or any part of the premises. Go to Part E - 5
<input type="checkbox"/>	Death of a child (Reg. 12) The death of a child while being educated and cared for by the education and care service or following an incident while being educated and cared for by the education and care service. Go to Part E - 6
<input type="checkbox"/>	Emergency service attended (Reg. 12) Any emergency for which emergency services attended. Go to Part E - 7
<input type="checkbox"/>	Closure or reduction in number of children attending the service (Reg 175 (2)(b)) Any incident that requires the Approved Provider to close, or reduce the number of children attending, the education and care service for a period. Go to Part E - 8

<input type="checkbox"/>	Any circumstance posing risk to health, safety and wellbeing (Reg 175(2)(c)) Any circumstance arising at the service that poses a risk to the health, safety or wellbeing of a child or children attending the service. Go to Part E - 9
<input type="checkbox"/>	Attendance of additional children (Reg 175(2)(ca)) The attendance at the approved education and care service of any additional child or children being educated and cared for in an emergency in the circumstances set out in Regulation 123(5). Go to Part E - 10
<input type="checkbox"/>	Incident of sexual or physical abuse (Reg 175(2)(d)) Any incident where the Approved Provider reasonably believes that physical abuse or sexual abuse of a child or children has occurred or is occurring while the child is or the children are being educated and cared for by the education and care service. Go to Part E - 11
<input type="checkbox"/>	Allegation of sexual or physical abuse (Reg 175(2)(e)) Any allegations that physical or sexual abuse of a child or children has occurred or is occurring while the child is or the children are being educated and cared for by the education and care service (other than an allegation that has been notified under section 174(2)(b) of the Law). Go to Part E - 12

PART E: INCIDENT DETAILS

E-1 Injury or Trauma			
Incident location (where did the incident occur?)	Indoors		
	Outdoors		
	Away from service		
	Unknown		
	If other, specify		
General activity at the time of the incident (What was the general activity at the time of the incident?)			
Cause/s of the injury or trauma (What was the general activity at the time of the incident)			
		If other, specify	
Did emergency services attend?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Further details of the incident (Please provide additional details here)			
Was urgent medical attention required by a registered practitioner/hospital?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Type of injury or trauma (What was the nature of the injury or trauma?) (if more than one, record details in 'further details of the incident' section)			
		If other, specify	
Part of the body affected (Identify the part of the body affected)			
NOTE: Please attach the service's completed injury or trauma record			
► Proceed to Part F: Details of Actions Taken			

E-2 Illness			
	Indoors		

Incident location (where did the incident occur?)	Outdoors		
	Away from service		
	Unknown		
	If other, specify		
General activity at the time of the incident (What was the general activity at the time of the incident?)			
Cause/s of the illness (What was the general activity at the time of the incident)		If other, specify	If other, specify
Did emergency services attend?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Further details of the incident (Please provide additional details here)			
Details of child (if more than one child, record details in 'further details of the incident' section)			
First name		Last name	
DOB		Gender	
Was urgent medical attention required by a registered practitioner/hospital?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Type of illness (What was the nature of the illness?) (if more than one, record details in 'further details of the incident' section)		If other, specify	
Part of the body affected (Identify the part of the body affected)			
NOTE: Please attach the service's completed illness record			
► Proceed to Part F: Details of Actions Taken			

E-3	Child missing from the service or unaccounted for		
Missing type (In what circumstance was the child missing?)	Child booked in and did not arrive		
	Child missing at approved service premises		
	Child missing while on excursion/regular outing		
	Child exited approved service premises		
	If other, specify		
Duration missing (How long was the child missing/unaccounted for?)			
Did emergency services attend?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Further details of the incident (Please			

provide additional details here)	
----------------------------------	--

NOTE: Please attach the service's completed incident record

► **Proceed to Part F: Details of Actions Taken**

E-4	Child taken away or removed from the service
------------	---

Incident location (where was the child taken or removed from?)	Indoors	
	Outdoors	
	Away from service	
	Unknown	
	If other, specify	
Child taken or removed by (Who was the child taken or removed by?)	<input type="checkbox"/> Someone known to the parent/guardian	<input type="checkbox"/> Parent/guardian
		<input type="checkbox"/> Other family member
		<input type="checkbox"/> Person known to parent/guardian
	<input type="checkbox"/> Someone not known to the parent/guardian	<input type="checkbox"/> Someone not known to the parent/guardian

Did emergency services attend?	<input type="checkbox"/> Yes <input type="checkbox"/> No
---------------------------------------	--

Further details of the incident (Please provide additional details here)	
---	--

NOTE: Please attach the service's completed incident record

► **Proceed to Part F: Details of Actions Taken**

E-5	Child mistakenly locked in or out
------------	--

Incident location (where did the incident occur?)	Indoors	
	Outdoors	
	Away from service	
	Unknown	
	If other, specify	

Duration locked in or out (How long was the child locked in/out of the service for?)	
---	--

Did emergency services attend?	<input type="checkbox"/> Yes <input type="checkbox"/> No
---------------------------------------	--

Further details of the incident (Please provide additional details here)	
---	--

NOTE: Please attach the service's completed incident record

► **Proceed to Part F: Details of Actions Taken**

E-6	Death of a child
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The death of a child occurred (in what circumstances did the child die?)	<input type="checkbox"/> While being educated and cared for by the education and care service <input type="checkbox"/> Following an incident while being educated and cared for by the education and care service
Did emergency services attend?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Further details of the incident (Please provide additional details here)	
NOTE: Please attach the service's completed incident record	
► Proceed to Part F: Details of Actions Taken	

E-7	Emergency service attended	
Did emergency services attend?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Further details of the incident (Please provide additional details here)		
NOTE: Please attach the service's completed incident record		
► Proceed to Part F: Details of Actions Taken		

E-8	Closure or reduction in number of children attending the service		
Nature of incident			
Cause of incident			
Impact on operation of the service	Date closed		
	Times closed		
	Reduced numbers of children attending		
Involvement of emergency services or other authorities			
Action taken to manage the incident			
Any other relevant information			
NOTE: Please attach the service's completed incident record			
► Proceed to Part F: Details of Actions Taken			

E-9	Any circumstance posing risk to health, safety and wellbeing		
Nature of incident			
Cause of incident			
Impact on operation of the service	Date closed		
	Times closed		
	Reduced numbers of children attending		

Involvement of emergency services or other authorities	
Action taken to manage the incident	
Any other relevant information	
NOTE: Please attach the service's completed incident record	
► Proceed to Part F: Details of Actions Taken	

E-10	Attendance of additional children		
Description of emergency			
Did the service take into account the safety, health and wellbeing of all children attending the education and care service when deciding to provide the education and care to the additional children?			<input type="checkbox"/> Yes <input type="checkbox"/> No
Please provide details			
NOTE: Please attach the service's completed incident record			
► Proceed to Part F: Details of Actions Taken			

E-11	Incident of sexual or physical abuse			
Detailed description of incident (including nature of incident, any injuries, other staff or children involved/present)				
Suspected cause of incident (if known)				
Impact on operation of the service				
Involvement of emergency services or other authorities (if relevant)		<input type="checkbox"/> Yes <input type="checkbox"/> No	Please specify	
Action taken by the service to manage the risk				
Any other relevant information				
NOTE: Please attach the service's completed documentation associated with this incident				
► Proceed to Part F: Details of Actions Taken				

E-12	Allegation of sexual or physical abuse			
Detailed description of incident (including nature of incident, any injuries, other staff or children involved/present)				
Suspected cause of incident (if known)				

Impact on operation of the service			
Involvement of emergency services or other authorities (if relevant)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Please specify	
Action taken by the service to manage the risk			
Any other relevant information			
NOTE: Please attach the service's completed documentation associated with this incident			
► Proceed to Part F: Details of Actions Taken			

PART F – Details of Action taken

Note – This section is to be completed for all serious incident types except death of a child.

Provide details of action taken (eg. first aid):

Steps that were taken to ensure parents/guardians were notified as soon as practicable. Please include time, date and nature of notification:

Name of parent or guardian notified:

Email of parent/guardian notified:

Contact number of parent/guardian notified:

Name of the witness to the incident:

Steps that were taken or will be taken to prevent or minimise this type of incident in the future:

Notifier's details (Note: this will be the person whom the Approved Provider and/or regulatory authority will contact for questions relating to this notification)

First name			Surname	
Position		Email		
Work phone		Mobile		

Service's completed incident, injury, trauma or illness record attached ☐ Yes ☐ No

Any other evidentiary documents attached ☐ Yes ☐ No

Submitting this form

Please submit this form along with any required documentation to the ECS Approved Provider. Where the Corporation of the Synod of the Diocese of Brisbane is the Approved Provider, submit the form and documents to ecs@anglicanchurchsq.org.au.

Additional information attached ☐ Yes ☐ No **List attachments**

Name of Nominated Supervisor	
Date	

Online reporting form to Child Safety: <https://secure.communities.qld.gov.au/cbir/ChildSafety#>

PRIVATE AND CONFIDENTIAL
Consent to Share Information/Referral Form
Anglican Schools Commission

Date form completed	
----------------------------	--

Details of staff member seeking to share information or make referral			
School name			
Address			
Given name/s		Surname	
Position			

Details of parent providing consent			
Given name/s		Surname	
Address			
Phone number		Mobile	

Student who the consent relates to			
Given name/s		Surname	
Address			
Age		DOB	

Consent being provided			
Consent is sought to:	<input type="checkbox"/> share information	<input type="checkbox"/> make a referral	

Details of agency/professional information will be shared with			
Agency name			
Name of professional			
Address			
Phone number		Mobile	

Information that will be shared	
Please outline the types of information that will be shared and any identifying information that will be included in the information provided to the agency/professional.	

Purpose of the information sharing	
Please outline why the information needs to be shared with the agency/professional named above.	

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Consent to Share Information/Referral Form
Anglican Schools Commission

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Details of the agency/professional receiving the referral

Agency name			
Name of professional			
Address			
Phone number		Mobile	

Information that will be provided in the referral

Please outline the types of information that will be provided as part of the referral.

Purpose of the referral

Please outline why the referral is required.

Consent

I, _____, as parent of _____, who is enrolled at _____, give my consent for _____ to share the information noted above or make the referral as noted above.			
Signature of parent		Date of consent	
Signature of staff member		Date consent obtained	

Note: The original copy of the signed consent form should be stored on the relevant student's school file. A copy of the signed consent form should be provided to the parent and to any agency that will be receiving the information or referral.

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School Request for Information Form (under the *Child Protection Act 1999*)

Anglican Schools Commission

Part A of this form is to be completed by the agency/organisation requesting relevant information from the Anglican School. The agency/organisation should retain a copy as a record of information requested/shared about a student or family.

Part A also contains details of the prescribed entity requesting relevant information from the school.

Part B contains details of relevant information provided by the school Principal for the purposes of ensuring a student's/unborn child's safety and/or enabling a coordinated service response that meets the needs of students and their families.

Part A Relevant information requested (to be completed by person making the request)

Date of request				
Degree of urgency	<input type="checkbox"/> Immediate/today	<input type="checkbox"/> < 5 days	<input type="checkbox"/> 5 days - 14 days+	
Information about Prescribed Entity requesting information	Agency/professional			
	Name of Person			
	Title			
	Phone			
	Email			
Name of student/family information is about <i>(if more than 1 student please list all names)</i>	Given name		Surname	
	Given name		Surname	
	Given name		Surname	
Information being sought				
Reason information is sought				
Relevant section of the <i>Child Protection Act 1999</i>	<input type="checkbox"/> s.159M - Prescribed entity request for specific relevant information <input type="checkbox"/> s.159N - Child Safety request for specific relevant information* *Relevant information is defined in section 159C of the <i>Child Protection Act 1999 (Qld)</i>			

Part B Relevant Information Requested (to be completed by the Principal)

Information provided		
Name of school		
Date/s information provided		Time:

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School Request for Information Form (under the *Child Protection Act 1999*)

Anglican Schools Commission

Format	<input type="checkbox"/> Meeting 1:1 <input type="checkbox"/> Phone	<input type="checkbox"/> Email	<input type="checkbox"/> Mail <input type="checkbox"/> Other
Name of Principal			
Signature of Principal			

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Schools Request for Information by a Law Enforcement Agency
Anglican Schools Commission

Completing the Form

Part A is to be completed by the Law Enforcement Agency (LEA) requesting information from an Anglican School about a current/prior student or family **AND** when the sharing of information is necessary for the prevention, detection, investigation, prosecution or punishment of a criminal offence or a breach of a law imposing a penalty or sanction (as per s.176(e) of the *Education (Accreditation of Non-State Schools) Act 2017*). The LEA should retain a copy of this form for their records.

Part B contains details of the information provided by the School to the LEA for the prevention, detection, investigation, prosecution or punishment of a criminal offence or a breach of a law.

Once completed, the original copy of the form should be stored securely on the relevant student/past student's school file.

Note

When a LEA requests copies of school documents/records, including sensitive documents such as child protection reports or counselling records, the school should request the documents be sought via a subpoena.

When the information request by the LEA relates to allegations or investigations involving an employee or volunteer of an Anglican School, the school should refer the investigating officers to the Director of Professional Standards on (07) 3835 2266.

Part A Information requested (to be completed by the LEA)

Date of request			
Degree of urgency	<input type="checkbox"/> Immediate/today	<input type="checkbox"/> < 5 days	<input type="checkbox"/> 5 days - 14 days+
Details of LEA and Officer requesting the information	Given name		Surname
	Title:		
	Name of LEA and Unit:		
	Phone:		
	Email:		
Name of current or prior student / family about whom the information is being sought <i>(if more than 1 student please list all names)</i>	Given name		Surname
	Given name		Surname
	Given name		Surname
	Given name		Surname
Information being sought			
Reason information is being sought			
Legislative authority for request	<input type="checkbox"/> s.176(e) <i>Education (Accreditation of Non-State Schools) Act 2001</i> - the information is being sought by a LEA and the disclosure is necessary for the prevention, detection, investigation, prosecution or punishment of a criminal offence or a breach of a law imposing a penalty or sanction		

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Schools Request for Information by a Law Enforcement Agency

Anglican Schools Commission

Part B Information Provided to the LEA (to be completed by the School Principal)		
Name of school		
Name of Principal		
Information provided to LEA		
Date and time information provided		Time:
How information was provided	<input type="checkbox"/> Meeting <input type="checkbox"/> Phone <input type="checkbox"/> Email	
Signature of Principal		

PRIVATE AND CONFIDENTIAL
School Request for Interview Form
Anglican Schools Commission

This form is to be used when a request is made by Child Safety and/or the Queensland Police Service to interview a student as part of an investigation into suspected abuse or neglect and the officers wish to conduct the interview on an Anglican school site without parental consent.

This form is to be completed by the Principal based on the information provided to them by the requesting officer. The form should be filed in a secure location with other student protection records.

Details of request for interview

Date of request			
School name			
Student's given name/s		Student's surname	
DOB		Gender	
When is contact required	<input type="checkbox"/> Immediately/today <input type="checkbox"/> 0 < 5 days <input type="checkbox"/> 5 days – 14 days+		
Agency/agencies interviewing student	<input type="checkbox"/> Child Safety <input type="checkbox"/> Queensland Police Service		
Officers who will interview the student	Name	Position	Agency

Relevant section of the *Child Protection Act 1999*

☐ Section 17, including that:

- it is in the child's best interests that the officer has contact with the child before the child's parents are told about the investigation
- the child's parents knowing in advance about the proposed contact with the child is likely to adversely affect or otherwise prevent the proper conduct of the investigation

Parental contact and/or consent

Interviews conducted in accordance with s.17 (1) (b) (i) and/or (ii)

As per s.17 (4) of the *Child Protection Act 1999*, an officer of

☐ Child Safety ☐ Queensland Police Service

will, as soon as practicable after the officer has had contact with the student, tell at least one (1) of the student's parents that the officer has had contact with the student and the reasons for the contact.

Interviews that DO NOT fall under s. 17 (1) (b) (i) and/or (ii)

Has the student's parent been contacted by Child Safety or the Queensland Police Service in relation to the planned interview?

☐ Yes ☐ No

NOTE: An interview may proceed once the parent has been informed and has given consent. Where parents do not consent, the interview may not proceed on school premises.

PRIVATE AND CONFIDENTIAL
School Request for Interview Form
Anglican Schools Commission

Support for the student during the interview

Can the relevant school provide the student with a support person during the interview?

☐ Yes - Child Safety or the Queensland Police Service have stated that a support person can be present

Outline any conditions stated by the investigating officers about the support person's presence during the planned interview

☐ No - Child Safety or the Queensland Police Service have stated that a support person may not be present during the interview

Reason/s given by the officers for not allowing a support person to be present during the interview

Details of interview

**Date and time
interview conducted**

Location of interview

**Details of all persons
present during the
interview**

Details of person completing form

Name of Principal

Date

Appendix 7

Resource Sheets

What is child abuse?

There are four types of child abuse that lead to harm to a child:

- physical abuse;
- sexual abuse;
- emotional/psychological abuse; and
- neglect.

Why does child abuse happen?

The causes of child abuse are complex and there is no single or simple explanation.

Factors known to contribute to the likelihood of abuse include:

- stress and tiredness;
- lack of parenting skills and knowledge;
- isolation and lack of support;
- substance misuse;
- gambling problems;
- negative childhood experiences including abuse;
- limited education;
- poverty and financial stress;
- homelessness;
- domestic and family violence;
- unrealistic expectations of children; and
- poor knowledge of developmental stages and behaviours.

Children are most often abused by someone they know and, in many cases, the person is a parent or carer rather than a stranger.

Community attitudes are also a contributing factor to child abuse. Attitudes that can inadvertently support abuse include:

- accepting the use of violence and force;
- accepting physical punishment of children;
- accepting parental 'ownership' of children and their right to treat children as they see fit;
- inequality between men and women;
- limited community understanding about the impact of child abuse and neglect of children; and
- people's perceptions that reporting or becoming involved is none of their concern.

Incidence of child abuse

- Children up to 4 years of age are most likely to be abused.
- Aboriginal and Torres Strait Islander children are over-represented in the child protection system with neglect being the most common type of harm.
- Similar numbers of girls and boys experience abuse.
- Emotional abuse is the most common type of abuse.

Impacts of child abuse

All forms of child abuse can have both short and long-term impacts for children and no two children react to harm in the same way.

- Some children show no observable effects of child abuse, while others show a wide range of signs.
- There may be long-term impacts even when short-term effects are not apparent.
- The younger the child and the more vulnerable they are, the more serious the consequences are likely to be.

Children may experience a range of emotional, psychological and physical impacts as a result of harm including:

- low self-esteem;
- increased fear, guilt and self-blame;
- depression, suicidal thoughts and self-harming;
- distrust of adults;
- disorders (learning/anxiety/attachment/PTSD);
- aggressive and other behavioural problems;
- developmental delay, eating disorders and physical ailments;
- permanent physical injuries or death;
- delinquency and criminal behaviour, including violence towards others;
- drug and alcohol abuse and high-risk sexual behaviour;
- difficulty forming relationships with other adults; and
- behaviour that leads to them being singled out, bullied and victimised.

Research links the experience of childhood abuse with psychological problems, an increased risk of suicide and drug and alcohol misuse.

The most serious effects are likely to be minimised or averted when someone takes action to help stop the abuse and protect the child.

Indicators of child abuse

Children who have been, or may be, experiencing abuse may show behavioural, emotional or physical signs of harm.

General indicators of child abuse can include:

- showing wariness and distrust of adults;
- bedwetting or soiling;
- demanding or aggressive behaviour;
- rocking, shaking or biting excessively;
- sleeping difficulties, including falling asleep;
- low self-esteem;
- difficulty relating to adults and peers;
- abusing alcohol or drugs;
- being seemingly accident prone;
- feeling suicidal or attempting suicide;
- having difficulty concentrating;
- being withdrawn or overly obedient;
- being reluctant to go home; and
- creating stories, poems or artwork about abuse.

Examples of signs for the specific types of abuse and harm you may see include:

PHYSICAL <ul style="list-style-type: none"> • Facial, head or neck bruises or lacerations • Burns/scalds • Multiple injuries/bruises especially over time • Fractures, dislocations or twisting injuries • Explanation offered that are not consistent with the injury • Repeated injuries with the same explanation e.g. "I fell off my bike" 	NEGLECT <ul style="list-style-type: none"> • Delay in achieving developmental milestones • Untreated physical problems • Poor personal hygiene • Scavenging for/stealing food, lack of adequate school lunches • Self-comforting behaviour • Extreme seeking of adult affection • Flat and superficial way of relating 	DOMESTIC VIOLENCE <ul style="list-style-type: none"> • Difficulties in eating and sleeping • Regressive behaviour • Developmental delays • Child is over-protective of the mother • Abuse of siblings/parent
EMOTIONAL/PSYCHOLOGICAL <ul style="list-style-type: none"> • Inability to value self and others • Lack of trust in people • Statements such as "I'm bad" or "I was born bad" • Extreme attention seeking behaviours 	SEXUAL <ul style="list-style-type: none"> • Direct/indirect disclosures of abuse • Age-inappropriate sexual behaviour and knowledge • Use of threats, coercion or bribery to force other children into sexual acts • Sexual themes/fears expressed in artwork, written work or play • Repeated urinary tract infections, especially in little girls • Physical trauma to buttocks, breasts, genitals, lower abdomen, thighs • Unexplained accumulation of money/gifts 	

For additional information on child abuse, refer to *Resource Sheets 1A-1F* for further information.

Myths and facts

Myth

Children make up stories about abuse.

Fact

Children rarely lie about abuse. Their disclosures of abuse may vary because of their reluctance or fear to tell what has happened. Children may fear that they or their parents may be removed from the family, or they may be pressured and threatened into retracting any disclosure.

Myth

Sometimes children are to blame for their abuse.

Fact

Children are never to blame for the abuse they suffer. Adults are responsible for their own behaviour and no matter how children behave, an adult never has any right to harm a child.

Myth

Reporting suspected child abuse can cause more harm than the abuse itself.

Fact

Continued abuse will cause more harm than any action taken to protect the child.

Myth

If child abuse is reported to authorities, they will take the child away from their family.

Fact

Removing the child from the family home is a last resort if the child is assessed as being at significant risk of ongoing or serious harm. In the majority of cases, the relevant departments work with the family to address issues that are causing the child to be abused or neglected.

Myth

Young children are the only ones vulnerable to child abuse.

Fact

Child abuse can happen to infants, children and adolescents. Sometimes it might seem like adolescents should be able to fight back, but it is hard to stand up to an adult causing physical, sexual or emotional harm, especially when it is their own parent. Child abuse is often an abuse of power and trust. Cruel words and sexual or physical abuse can hurt adolescents as much as they can hurt a child.

Why are prevention and early intervention important

The most serious effects on children from experiences of child abuse and neglect are likely to occur when no one takes action to help prevent or stop the abuse and protect the child.

With early identification and appropriate response and support, children can recover from experiences of abuse and neglect. A child's support network, and bonds with those who believe and protect them, will help them to cope.

Support and counselling can also help children identify protective behaviours and establish positive relationships for the future.

Without effective support, ongoing child abuse and neglect can have long-term effects on individuals and communities. Research links the experience of childhood abuse and neglect with psychological problems, an increased risk of suicide and increase likelihood of drug and alcohol misuse.

What is physical abuse?

Child physical abuse refers to the non-accidental use of physical force against a child that results in harm to the child.

Physical abuse may include:

- hitting with a hand or implement;
- shaking, throwing or pushing;
- burning or scolding with hot water;
- drowning or attempted drowning;
- cutting or biting;
- poisoning; and
- female genital mutilation.

Depending on the child's age and the nature of the abusive behaviour, physical force that is likely to cause physical harm to the child may also be considered abusive. For example, a situation where a baby is shaken but not injured would still be considered physically abusive.

A parent does not have to intend to physically harm their child to have physically abused them. For example, physical punishment by a parent that results in bruising would generally be considered physical abuse.

Bodily indicators of physical abuse

Bodily indicators of physical abuse can include:

- brain injury;
- injuries to eyes and teeth;
- ligature marks;
- unexplained bruises or welts often of different ages;
- burns and scalds;
- sprains and dislocations;
- bites, lacerations or abrasions;
- poisoning (including indicators such as vomiting, incoherent behaviour and unconsciousness); and
- genital damage.

TEN-4 Bruising Rule

While any bruising on a child should be considered when deciding if a child may be at risk of significant physical harm, the University of Louisville School of Medicine has published research which demonstrates that bruising on a child's Torso, Ears and Neck and bruising anywhere on a child 4 months old or younger are highly significant indicators of physical abuse.

This is referred to as the Ten-4 Bruising Rule.

Behavioural indicators of physical abuse

Possible behavioural indicators of physical abuse include:

- reporting injury by parents/guardians;
- unusual or unexplained injuries or explanations that are inconsistent, vague or difficult to believe;
- wearing inappropriate clothing in an attempt to cover injuries (e.g. wearing a jumper in warm weather);
- frequent unexplained absences;
- extreme wariness of adult contact;
- forming attachments to strangers too readily;
- apprehension when other children cry;
- behavioural extremes (e.g. aggression/withdrawal) or excessive compliance;
- fear of parents/carers or reluctance to go home;
- a marked delay between injury and seeking medical assistance;
- lack of concern for the child's wellbeing or for seeking treatment and care of the child's injury; and
- repeated visits to health services with injuries, poisoning or minor complaints.

Remember, physical abuse may not always leave visible marks or injuries.

Impacts of physical abuse

Physical abuse can have both short and long-term impacts on children.

Children may experience emotional, psychological and physical impacts as a result of being harmed including:

- permanent physical injuries or death;
- low self-esteem/ increased fear, guilt, depression and self-blame;
- distrust of adults and anxiety/post-traumatic disorders;
- attachment disorders;
- learning disorders, including poor language and cognitive development;
- aggressive behaviour and other behavioural problems;
- developmental delay, eating disorders and physical ailments;
- delinquency and criminal behaviour, including violence towards others;
- drug and alcohol abuse and high-risk sexual behaviour;
- difficulty forming relationships with other adults; and
- behaviour that leads to them being singled out, bullied and victimised.

Ten-4

Bruising Rule

Be aware of any bruising to the:

Torso

Ears

Neck

or

bruising **anywhere** on a child
4 months old or younger.

These bruises are **significant**
indicators of abuse.

**Bruising on babies is
not normal!**

Pierce MC, Kaczor K, Aldridge S, O'Flynn J, Lorenz DJ. Bruising characteristics discriminating physical child abuse from accidental trauma. *Pediatrics*. 2010;125(1):67-74. Epub Dec. 7, 2009. Erratum in *Pediatrics*. 2010;125(4):861.

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Be aware of bruising



- Bruising is the most overlooked sign of abuse.
- Bruising is extremely rare in infants younger than 6 months old and uncommon in pre-ambulatory infants.
- Bruising in infants is a significant indicator of abuse and must be reported to Child Protective Services; these infants should be medically evaluated.

Always remember the TEN-4 Bruising Rule.



Sugar NF, Taylor JA, Feldman KW et al. Bruises in infants and toddlers: those who don't cruise rarely bruise. *Arch Pediatr Adolesc Med.* 1999;153(4):399-403.

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Bruising Characteristics Discriminating Physical Child Abuse From Accidental Trauma

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KEY WORDS

bruising, decision rule, nonaccidental trauma, predictors, screening tools

ABBREVIATIONS

CART—classification and regression tree

MVC—motor vehicle collision

TEN—torso, ear, and neck

TEN-4 BCDR—body region- and age-based bruising clinical decision rule

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WHAT'S KNOWN ON THIS SUBJECT: Bruising occurs with both physical child abuse and accidental trauma, and bruising characteristics discriminate between the 2 groups.



WHAT THIS STUDY ADDS: This study develops a clinically sensible model in the form of a bruising clinical decision rule to identify children and infants with bruising who are at high risk for physical abuse and require further evaluation.

abstract

OBJECTIVE: Our objective was to conduct a pilot study to identify discriminating bruising characteristics and to model those findings into a decision tool for screening children at high risk for abuse.

METHODS: A case-control study of children 0 to 48 months of age who were admitted to a PICU because of trauma was performed. Case subjects ($N = 42$) were victims of physical abuse, and control subjects ($N = 53$) were children admitted because of accidental trauma during the same time period. Bruising characteristics (total number and body region) and patient age were compared for children with abusive versus accidental trauma. The development of a decision rule for predicting abusive trauma was accomplished with the fitting of a classification and regression tree through binary recursive partitioning.

RESULTS: Ninety-five patients were studied. Seventy-one (33 of 42 patients in the abuse group and 38 of 53 in the accident group) were found to have bruising, and the characteristics were modeled. Characteristics predictive of abuse were bruising on the torso, ear, or neck for a child ≤ 4 years of age and bruising in any region for an infant < 4 months of age. A bruising clinical decision rule was derived, with a sensitivity of 97% and a specificity of 84% for predicting abuse.

CONCLUSIONS: Discriminating differences exist in bruising characteristics for abusive versus accidental trauma. The body region- and age-based bruising clinical decision rule model functions as a clinically sensible screening tool to identify young children who require further evaluation for abuse. *Pediatrics* 2010;125:67–74

Up to 75% of abuse may be missed in the acute care setting because medical professionals fail to recognize signs of abuse.¹ This lack of recognition leads to errors in decision-making, lost opportunities to intervene, and potentially poor patient outcomes from repeat injuries.¹⁻⁸ Many repeat injuries may be preventable through earlier recognition.

Bruising is one of the most common and most readily visible injuries resulting from physical child abuse, but it is missed as a warning sign in up to 44% of fatal and near-fatal cases.⁹ Bruising may be overlooked because it is usually clinically insignificant. In cases of abuse, however, it may be the only visible sign of injury or signal of internal injuries.^{10,11} Bruising can be an indicator of occult trauma and thereby mandates an increased index of suspicion for additional injury, with further evaluation.¹²⁻¹⁹ The seatbelt sign¹³⁻¹⁶ and tin ear syndrome¹² are notable examples of how bruising can have clinical significance and drive decision-making and action. Currently, no evidence-based guidelines exist to aid clinicians in discriminating bruises caused by abusive versus accidental trauma. However, measurable differences have been described.²⁰⁻²⁶ The predictive accuracy of these differences in bruising characteristics has not yet been determined or incorporated into a practical decision-making model for the acute care setting.

The goal of this study was to develop such a model in the form of a bruising clinical decision rule to identify children and infants with bruising who are at high risk for physical abuse and require further evaluation. The specific aims of this study were to identify discriminating differences in bruising characteristics for children with abusive versus accidental trauma and to derive a clinical decision rule on the basis of those findings.

METHODS

Study Design

We conducted a retrospective, case-control study of patients with abusive or accidental trauma who were admitted to the PICU of a children's hospital between January 1, 2002, and December 31, 2004. Cases analyzed in this study were consecutive admissions of patients with abusive trauma. Control subjects were children admitted to the PICU with injuries sustained from accidental trauma during the same 3-year time period. The control subjects were age-matched as closely as possible (days to months) within the constraints of the available patient population. All eligible patients <1 year of age with accidental trauma were included. This study was approved by the University of Louisville Institutional Review Board.

Identification of Potential Study Subjects

Trauma Registry

Subjects were identified for the study by using the hospital trauma registry, which categorizes patients according to age, stated mechanism of trauma, and injury cause, defined as abuse, accident, or indeterminate. All injury cause determinations in the trauma registry were made independent of, and before, this study.

Inclusion Criteria

Included children (1) were 0 to 48 months of age, (2) were admitted to the PICU because of trauma during the 3-year study period, and (3) had an injury cause identified through the trauma registry as abuse or accident.

Exclusion Criteria

Children with (1) traumatic injuries of indeterminate cause and/or (2) coagulation disorders or abnormalities (eg, hemophilia or cancer) were excluded.

Criteria Required for Categorization as Case or Control Subject

The criteria for case subjects (abuse) were as follows: (1) trauma registry categorized the trauma as abuse; (2) hospital medical team determined the injuries to be highly suggestive of abuse; (3) stated cause of injury did not account for the type, severity, and/or number of injuries; (4) history of trauma was absent, vague, or changing; or (5) state social services that determined the patient was abused. The criteria for control subjects (accident) were as follows: (1) trauma registry categorized the trauma as an accident; (2) hospital medical team determined the injuries to raise no concerns regarding abuse; (3) stated cause of injury was consistent with the type, severity, and/or number of injuries; (4) history was detailed, thorough, and consistent; and (5) no indicators of abuse were found when skeletal survey, social service assessment, and/or forensic team evaluations were performed. Skin findings were not among the criteria used to categorize patients as case or control subjects, and categorization occurred before any data analysis.

Data Abstraction

Data Abstracted

The following variables were abstracted from each patient's traditional and/or electronic medical record: patient age, race, and gender, total number of bruises, body location of bruising, associated (nonskin) injuries, and stated cause of injury, as provided on the trauma sheet. Data abstraction included the use of the standardized nursing database, hospital medical records, and autopsy reports (when applicable and available).

Nursing Skin Assessment Database

Skin assessment data were recorded for all PICU patients as the standard of

care before and without knowledge of this study. All skin findings were recorded, according to hospital protocol, in a prospectively maintained skin assessment database that allows for region-specific documentation.

The nursing skin assessments for the initial 72 hours of each patient's admission (or until discharge from the PICU, if the length of stay was <72 hours) were entered into the research database. Each entry consisted of the (1) type of skin finding (eg, bruise or abrasion), (2) body region of skin finding, and (3) count.

Medical Record and Autopsy Review

Study investigators also performed a comprehensive medical record review of each subject's traditional and/or electronic medical record and autopsy report (when applicable and available). Any newly identified bruise locations or counts were added to the data set, such that the final data set consisted of all cutaneous findings abstracted from the nursing database, medical record reviews, and autopsy reports. Once a bruise was identified on a specific body region of a given patient, it was not recounted.

Data Analysis

Descriptive Statistics

Descriptive statistics were calculated for patient age, cumulative bruise counts, and bruise location. Bruise counts were summed per location. The difference in cumulative bruise counts for children with abusive versus accidental trauma was tested with a negative binomial regression, with a single factor accounting for type of trauma.

Classification and Regression Tree and Clinical Decision Rule Derivation

The development of a clinical decision rule for predicting abusive trauma was accomplished with the fitting of a classification and regression tree

TABLE 1 Sample Demographic Characteristics

	Complete Sample	Abusive Trauma (Case Subjects)	Accidental Trauma (Control Subjects)
All patients enrolled, <i>N</i>	95	42	53
Age, mo			
Mean \pm SD	12.3 \pm 12.6	9.8 \pm 12.2	14.4 \pm 12.7
Range	0.3–48.4	0.3–48.4	1.0–42.1
Male, %	63	71	57
Patients with bruising, <i>N</i>	71	33	38
Age, mo			
Mean \pm SD	13.0 \pm 12.8	11.3 \pm 13.4	14.4 \pm 12.3
Range	0.3–48.4	0.3–48.4	1.0–40.9
Male, %	65	67	63

(CART) through binary recursive partitioning (R 2.3.1; R Development Core Team, Vienna, Austria). This method allowed each patient to be classified into 1 of 2 possible categories for the outcome variable, that is, abusive or accidental trauma. The binary recursive partitioning algorithm identified successive "splits" for a set of predictor variables, such that each predictor variable split a parent node into 2 child nodes. The child nodes then became either terminal nodes or parent nodes subject to subsequent splits on the basis of additional criteria. The predictor variables maximized the homogeneity of the nodes with respect to an outcome variable (abusive or accidental trauma). The tree was defined so that it was inclusive and exhaustive, that is, all patients were evaluated under all splitting criteria and a terminal node was established for all patients. A goal of perfect or near-perfect sensitivity was established. The fitting of successive trees to the data set was performed in concert with a visual examination of the bruising characteristics. The decision tree also was assessed for clinical sensibility.

RESULTS

Study Group

A total of 95 patients met the enrollment criteria. Sample demographic features are presented in Table 1, and the causes of injury for patients categorized as control subjects are pre-

sented in Table 2. Seventy-one patients with bruising were identified; the bruising characteristics of those patients were analyzed and used for modeling.

Cumulative Numbers of Bruises

The total bruise counts per patient were significantly different between the patients with physical abuse and those with accidental trauma (negative binomial regression, $z = 9.6$, $P < .0005$). Patients with abusive trauma

TABLE 2 Causes of Injury for Patients in Control Group

Cause of Injury	<i>n</i>
MVC	29
Non-MVC	24
Fall (ground based) ^a	1
Fall from bed/couch/table ^a	5
Fall in car/bouncy seat from table/counter ^a	4
Fall out of bed of pick-up truck	1
Fall with caregiver	2
Fall from father's shoulders	1
Fall from moving golf cart	1
Pedestrian vs truck	1
Jumped out of car	1
All-terrain vehicle accident	1
Dropped by caregiver	2
Bouncy seat collapsed	1
Stair fall (in walker)	1
Stair fall (with caregiver)	1
Caregiver fell on child	1
Total	53

^a According to hospital protocol, all young children with intracranial hemorrhage are admitted to the PICU for observation. Seven children had small areas of contact epidural or subdural hemorrhage. Three children had minimally depressed or linear skull fractures with no intracranial injury, but concussive symptoms were present. All 10 children were <1 year of age. None required further treatment or intervention, and all were in neurologically normal condition at discharge.

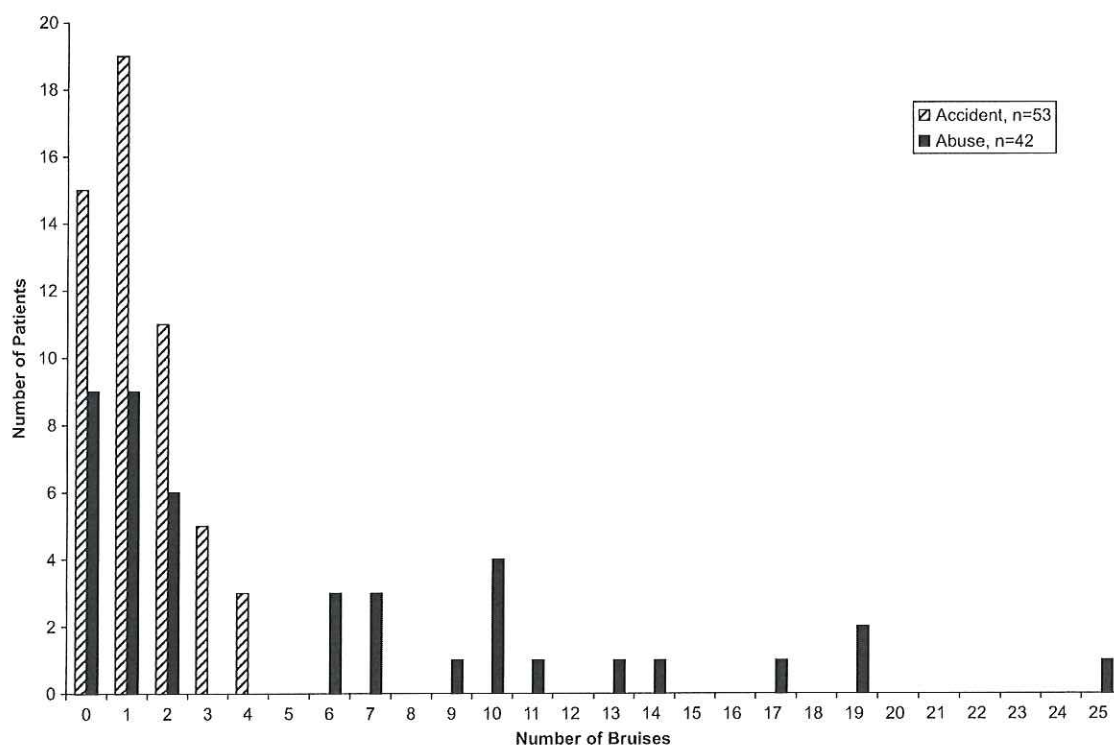


FIGURE 1
Comparison of cumulative numbers of bruises for patients with abusive versus accidental trauma.

had as many as 25 bruises, with a median of 6 bruises (interquartile range: 1–10 bruises), compared with a median of 1.5 bruises (interquartile range: 1–2 bruises) for patients with accidental trauma. All patients with accidental trauma had ≤ 4 bruises (Fig 1).

Body Regions With Bruising

Discriminating differences in body regions with bruising were identified for children with abusive versus accidental trauma. All bruising to the ear, neck, hands, right arm, and chest and buttocks regions of the torso were perfectly predictive of abuse, with no patients with accident-related trauma demonstrating bruising in those areas. The back and abdominal regions of the torso were statistically significant or approached statistical significance, respectively, for discriminating abuse. All bruising to the genitourinary area and hip occurred only in patients with abusive trauma, but the number

was too small for determination of statistical significance. The face, cheek, scalp, head, and legs showed bruising in patients with abusive and accidental trauma and was not discriminating for abusive trauma (Fig 2).

CART and Clinical Decision Rule Derivation

Overview

The development of a decision rule for predicting abusive trauma was accomplished with the fitting of a CART through binary recursive partitioning. The tree exhibited splits on the basis of the presence (or absence) of bruising to an aggregate body region and patient's age.

Split 1: Aggregate Body Region

Maximal sensitivity and clinical sensibility for predicting abuse was achieved with an aggregate region consisting of the torso, ear, and neck (TEN). The torso includes the chest, ab-

domen, back, buttocks, genitourinary region, and hip. This TEN aggregate region included all body regions in which a bruise indicated abuse, with the exceptions of the hands and right arm. These 2 regions, although perfectly predictive, did not become splitting criteria because the patients with hand or right arm bruises were already captured by the other criterion. Bruises in the TEN aggregate region were uncommon in the accident group (Table 3).

Split 2: Age

Age correctly captured 7 additional patients with abusive trauma by using a split at an age of <4 months. These patients would have been missed on the basis of region alone.

On the basis of the CART results, bruising in the TEN aggregate region or bruising in a young infant serves as a red flag. If the cause of this unusual bruising cannot be verified as acciden-

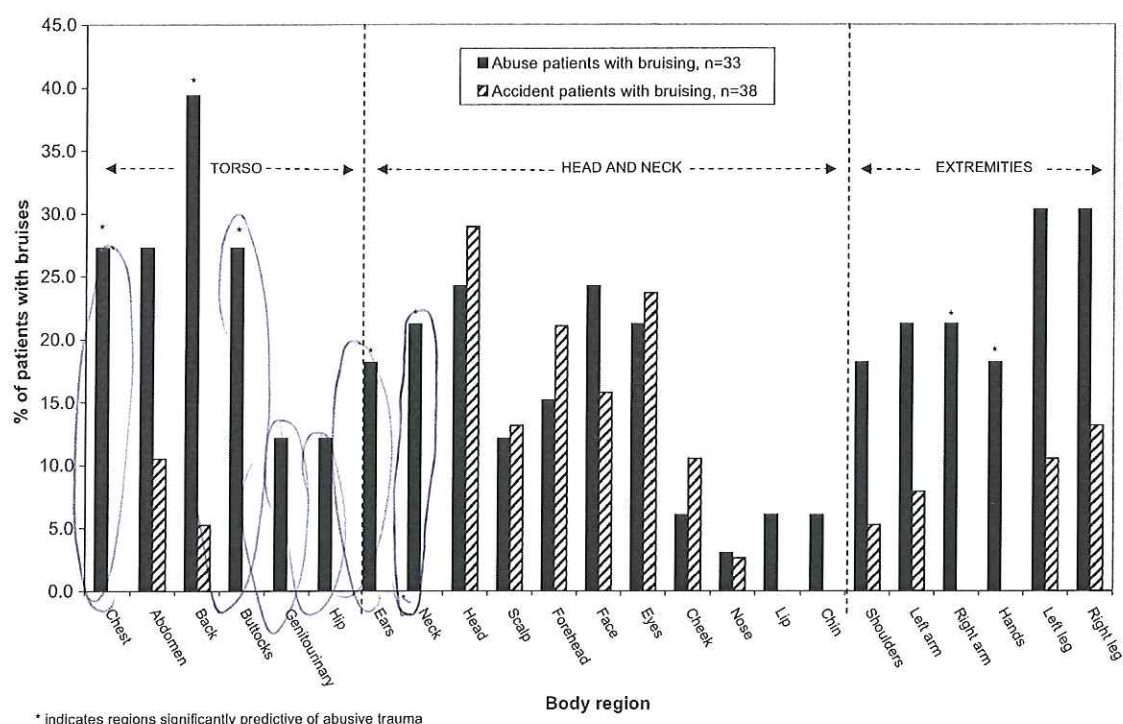


FIGURE 2
Bruise distribution for patients with abusive and accidental trauma.

TABLE 3 Bruise Counts According to Body Region Within TEN Aggregate

TEN Body Regions	No. of Bruises		
	Abuse	Accident	
		MVC	Non-MVC
Chest	13	0	0
Abdomen	17	2	2
Back	20	1	1
Buttocks	18	0	0
Genitourinary area	4	0	0
Hip	5	0	0
Ear	8	0	0
Neck	18	0	0
Total	103	3	3

tal, then a screen for child abuse is warranted. The following 3 questions constitute the proposed model. (1) Is there bruising in the TEN region of a child ≤ 4 years of age? (2) Is there bruising in any region of an infant < 4 months of age? (3) Is there a confirmed accident in a public setting that accounts for the bruising in the TEN region or on the infant? This model correctly classified 32 of 33 abuse victims, for a sensitivity of 97%, and 32 of 38 accident victims, for a specificity of

84% (Fig 3). The 1 abuse victim who was classified incorrectly was a 19-month-old child with an eye bruise. Table 4 illustrates the low frequency of bruising in the TEN aggregate region and on infants < 4 months of age among patients with accidental versus abusive trauma.

DISCUSSION

Decision Rule

Our study differs from previous work in that it is the first study to investigate and to compare bruising characteristics of children ≤ 4 years of age from 2 trauma populations (abuse and accident) with injuries warranting admission to the PICU. A body region- and age-based bruising clinical decision rule (TEN-4 BCDR) was derived on the basis of discriminating bruising characteristics, to inform decision-making. Meeting either the first or second criterion of the TEN-4 BCDR indicates the need for further evaluation for possible physical abuse if a clear accidental

cause that accounts for the specific bruising, such as a motor vehicle collision (MVC), cannot be confirmed.

Model Usability and Comparison With Previously Developed Models

Our model uses skin examination findings and the age of the patient. The resulting simplicity of the TEN-4 BCDR enhances its clinical sensibility and potential utility in all clinical environments. To our knowledge, Dunstan et al²⁶ conducted the only other study for decision-model development related to discriminating bruising caused by abuse. Their model showed discriminating differences, giving credence to our work. However, complexity differs significantly between the 2 models. The system described by Dunstan et al²⁶ may have limited practical use in fast-paced and/or high-acuity environments. Our study specifically established design constraints to facilitate the derivation of a model that could be applied in the acute care set-

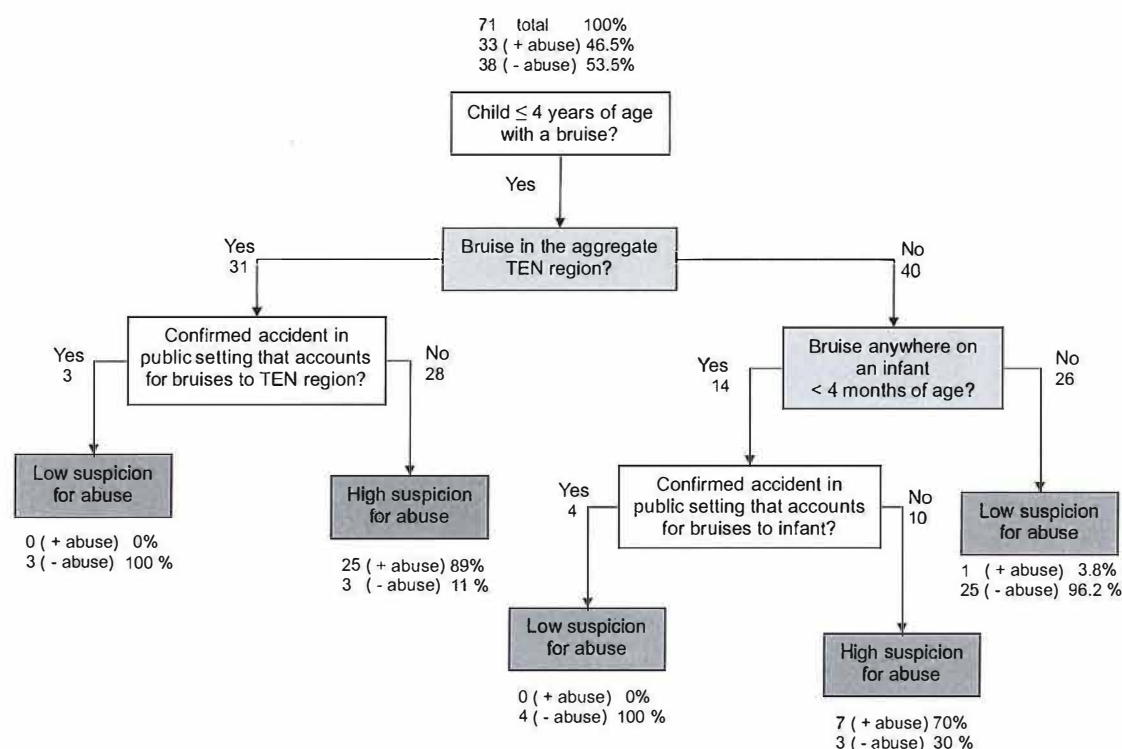


FIGURE 3
Dendrogram of CART.

TABLE 4 Summary of Cumulative Bruise Counts and Numbers of Patients

	Abuse	Accident		
		MVC	Non-MVC	All
Total no. of bruises (no. of patients)	226 (33)	49 (24)	19 (14)	68 (38)
No. of bruises in TEN aggregate region (no. of patients)	103 (25)	3 (3)	3 (3)	6 (6)
No. of bruises (all regions) on patients <4.0 mo of age (no. of patients)	74 (14)	9 (4)	4 (3)	13 (7)
No. of patients with >4 bruises	18	0	0	0

ting. We sought to derive a decision rule that was based on readily available data obtained as part of routine patient care, and we excluded the use of factors that are known to be highly associated with abuse but often are unavailable or unreliable in the acute care setting at the time of the initial assessment. For example, factors such as clinical history, past injuries, and family history of domestic violence and drug abuse were excluded. In cases of possible child abuse, the history provided often is intentionally deceptive and caregivers often are dishonest about past events. A rule based on

such factors likely would yield false-negative results.

Body Regions With Bruising

We sought to identify which body regions had bruising unique to physical assault. In general, victims of abuse were found to have multiple bruises on multiple regions of the body, which emphasizes that all parts of the body are vulnerable during assault. This is in direct contrast to the bruising findings for patients with accidental trauma. In the accident group, bruising within the TEN aggregate region was absent or rare, regardless of MVC

or non-MVC injury cause (Table 3). Our study supports the existing evidence that, although bruising occurs from both physical abuse^{12,20,26–30} and accidental trauma,^{21–25} bruising characteristics discriminate between the 2 groups.

The current consensus findings assert that precruising infants rarely bruise and, when bruising is present, the total number of bruises is small and bruising occurs over bony, prominent areas once the child is mobile.^{22–25} Certain sites, such as the TEN, rarely or never bruise. Conversely, these regions were identified as common bruising sites among abused patients.^{20,25–27,30}

Maguire et al³¹ reported the consensus findings of 23 articles that indicated that bruises to the face, back, abdomen, arms, buttocks, ears, and hands suggest physical child abuse. Our study of PICU patients with trauma paralleled these findings, with the exception of facial bruising. The face was

not a splitting criterion because facial bruising was common in accidental and abusive trauma. Bruises to the scalp, head, forehead, eyes, face, cheek, and nose accounted for 68% of all bruises from accidental causes. It is possible that bruises designated as "facial" in other publications would have been classified more specifically, for example, as ear, chin, eyes, or forehead in our study (Fig 2).

Patient's Age

Eight patients with abusive trauma were misclassified as sustaining accidental trauma, on the basis of body region splitting criteria; 7 were young infants and 1 was a 19-month-old child. An age splitting criterion of <4 months allowed the capture of all 7 nonmobile young infants. Bruising is uncommon on infants without independent mobility.^{22–24,31} Sugar et al²² identified only 2 infants <6 months of age with bruising not related to a medical cause. In addition, infant homicide rates are highest in the first 4 months of life, which supports the age cut-off value of <4 months in our model. Models fit to larger data sets likely will exhibit an age cut-off value reflecting the nonambulatory population, but it may not be 4 months.

Cumulative Numbers of Bruises

Abusive trauma often involves multiple impacts. In both our study and previous studies, patients with abusive trauma sustained significantly larger numbers of bruises than did patients with accidental trauma.^{22–24} The cumu-

lative number of bruises was not used as a splitting criterion in our model because the sensitivity and specificity were maximized with other splitting criteria.

Limitations

The certainty of each case's categorization as abuse or accident is a limitation inherent in the retrospective nature of this study. Strict criteria for categorization were applied before the start of the study. Each patient's medical record was analyzed for recurrent medical visits during the study period, and no patient in the accidental trauma group returned with a repeat injury.

Greater attention might have been paid to documentation if physical abuse was suspected. Hospital protocol specifies that all patients in the PICU receive a comprehensive skin assessment every 4 hours, with standardized documentation of all skin findings. This protocol decreases the likelihood of bias or error.

Most MVCs are confirmable accidental causes of trauma in which abuse is not in question. However, their inclusion allows for comparisons between severely injured patients with multiple-impact accidental trauma and those with multiple impacts from abusive trauma. In the control group, skin injuries were similar for MVC and non-MVC cases, with respect to regions and numbers of bruises (Tables 3 and 4).

The results of this study are based on findings for children with abusive or accidental trauma who were admitted to

the PICU. Conclusions can be drawn only regarding bruises on severely injured children. However, similarities between our results and the collective analysis of 2400 published skin examinations conducted in ambulatory settings indicate that our results may be applicable in less-acute settings.^{22–24}

Our use of an exploratory technique such as a CART model may be considered a limitation. We think that the use of this technique was justified, because we were interested in model-building rather than hypothesis-testing. Fitting a classification tree is a purely exploratory technique, which makes no assumptions about the data and how they were generated.

CONCLUSIONS

Our study generated TEN-4 BCDR to discriminate bruises caused by physical child abuse in children ≤ 4 years of age. The intent of this rule is to identify children who are at high risk for abuse and require further evaluation, according to the guidelines of the American Academy of Pediatrics.³² Our findings and literature findings provide compelling evidence that bruising without a clear confirmatory history for any infant who is not cruising and bruising to the torso, ears, or neck of a child ≤ 4 years of age should be considered "red flags" and should serve as signs of possible physical child abuse. The TEN-4 BCDR requires prospective testing and validation in different clinical settings.

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Inside Edge on NIH Grant Funding May Be to New Investigators: Recognizing the declining number of individuals opting for a research career in biological sciences, the National Institutes of Health have decided to increase their funding to new investigators who have never received NIH funding. According to an article in The New York Times (Harris G, The New York Times, September 22, 2009), of the 19 percent of "exception" grants, totaling more than \$380 million awarded to individual scientists outside of grant review committees, nearly half went to young scientists, an increase of almost 30 percent since 2003. With the recent economic stimulus money being added to the NIH budget, it will be interesting to see if the young investigator continues to have the inside edge. Now if we could only see the statistics regarding how many of these young scientists were actually funded to do pediatric research!

Noted by JFL, MD

What is neglect?

Neglect, which has been one of the most commonly reported type of abuse in multiple Australian States for several years, occurs when a child's basic necessities of life are not met, and their health and development are affected.

Basic necessities include:

- food and adequate clothing;
- housing and hygienic living conditions;
- appropriate and timely medical and healthcare;
- emotional nurturance;
- personal hygiene; and
- adequate supervision.

Only a person who has responsibility to provide appropriate care for a child can fail to provide that care, therefore neglect is predominantly a parental issue. Child protection data indicates that biological parents are held responsible for the majority of neglect cases (AIHW, 2014; Sedlak et al., 2010)

However, other individuals who are charged with the care of a child, such as foster carers, teachers or child care providers, can also be responsible for neglect.

Indicators of neglect

Some of the possible indicators of neglect include:

- malnutrition;
- begging, stealing or hoarding food;
- poor hygiene, matted hair, dirty skin or body odour;
- unattended physical or medical problems;
- comments from a child that no one is home to provide care;
- being constantly tired;
- frequent unexplained absences;
- inappropriate clothing, especially inadequate clothing in winter;
- frequent illness, infections or sores;
- being left unsupervised for long periods; and
- alcohol or drug abuse being present in the household.

Impacts of neglect

Neglect can be really difficult to identify but it can have serious immediate and long-lasting effects on the child.

Neglect ranges from leaving a child at home unsupervised to more severe cases of malnutrition and denial of adequate care resulting in death. In some cases, it can cause permanent disabilities.

Some long and short term effects can include:

- suicidal ideation and self-harm;
- aggressive behaviours;
- sleeping issues;
- alcohol and drug use;
- wetting the bed;
- nightmares;
- depressed moods;
- obsessive behaviour;
- clingy behaviour;
- anxiety;
- soiling clothes;
- changes in behaviour;
- risk-taking behaviour;
- withdrawn; and
- changes in eating habits.

Reasons for neglect

There can be one or more reasons why a parent or carer neglects the care needs of their child. These can include:

- low income and financial stress;
- social isolation; and
- lack of family/community support.

Poverty and neglect are closely linked but not all children from poor families are neglected and children from more affluent families can be neglected.

Families may also be perceived as being neglectful when, in fact, their cultural context or economic situation may be more important considerations.

Rather than a statutory child protection response, some families may be better served by providing support to educate them or provide access to other resources, such as financial assistance.

Emotional/psychological abuse

What is emotional/psychological abuse?

Emotional/psychological abuse is often defined as both acts of omission (emotional/psychological neglect) and commission (emotional/psychological abuse) associated with impairment in behavioral, emotional/psychological (e.g. self-esteem) and social functioning (i.e. social competence) (Tonmyr, Draca, Crain, & MacMillan, 2011).

Emotional/psychological abuse occurs when a child's social, emotional/psychological, cognitive or intellectual development is impaired or threatened and can include emotional/psychological deprivation due to persistent:

- rejection or criticism;
- hostility or yelling;
- teasing or bullying; and
- exposure of a child to domestic and family violence.

Emotional/psychological abuse may also feature:

- age or developmentally inappropriate expectations on the child;
- over-protection; and
- limitation of exploration and learning.

Prevalence of emotional/psychological abuse

For more than 5 years, emotional/psychological abuse has been the highest substantiated type of abuse across every State in Australia (AIHW, 2015-16).

Historically, emotional/psychological abuse has been more common than both physical and sexual abuse.

Physical indicators of emotional/psychological abuse

Physical indicators of emotional/psychological abuse include:

- speech disorders,;
- delays in emotional/psychological;
- mental or physical development; and
- failure to thrive without an organic cause.

Behavioural indicators of emotional/psychological abuse

Possible behavioural indicators of emotional/psychological abuse include:

- overly compliant, passive and undemanding behaviour;
- extremely demanding, aggressive and attention seeking behaviour;
- anti-social and destructive behaviour including compulsive lying or stealing;
- delayed physical, emotional/psychological or intellectual development;
- low tolerance or frustration;
- poor self-image and low self-esteem;
- unexplained mood swings;
- lack of trust of others;
- feelings of worthlessness about life and themselves;
- anxiety, depression, self-harm and suicidal thoughts;
- eating hungrily or hardly at all;
- behaviours that are not age appropriate (e.g. overly adult, or overly infantile);
- uncharacteristic attention-seeking;
- self-harming;
- fear of failure, overly high standards and excessive neatness;
- poor social and interpersonal skills; and
- a parent or carer constantly criticising, threatening, belittling, insulting or rejecting the child.

Impacts of emotional/psychological abuse

Children may experience a range of emotional, psychological and physical impacts as a result of emotional/psychological abuse including:

- permanent physical injuries or death;
- low self-esteem/ increased fear, guilt, depression and self-blame;
- distrust of adults and anxiety/post-traumatic disorders;
- attachment disorders;
- learning disorders, including poor language and cognitive development;
- aggressive behaviour and other behavioural problems;
- developmental delay, eating disorders and physical ailments;
- delinquency and criminal behaviour, including violence towards others;
- drug and alcohol abuse and high-risk sexual behaviour;
- difficulty forming relationships with other adults; and
- behaviour that leads to them being singled out, bullied and victimised.

The most serious effects are likely to occur when no one takes action to help stop the abuse and protect the child.

Domestic and family violence

The contemporary understanding of domestic violence is a person being subjected to an ongoing pattern of abusive behaviour by an intimate partner or family member. This behaviour is motivated by a desire to dominate, control or oppress the other person and to cause fear.

The *Domestic and Family Violence Protection Act 2012* also provides definitions of 'domestic violence' (s.8 DFVA), 'associated domestic violence' (s.9 DFVA), 'exposed to domestic violence' (s.10 DFVA) and 'emotional or psychological abuse' (s.11 DFVA).

According to s.8 of the DFVA, domestic violence means behaviour by one person towards another person with whom the first person is in a relevant relationship that is physically, sexually, emotionally, psychologically or economically abusive; threatening; coercive; or in any other way controls or dominates a person and causes a person to fear for their safety or wellbeing or the safety or wellbeing of someone else.

Domestically violent behaviours include:

- causing personal injury to a person or threatening to do so;
- coercing a person to engage in sexual activity or attempting to do so;
- damaging a person's property or threatening to do so;
- depriving a person of the person's liberty or threatening to do so;
- threatening a person with the death or injury of the person, a child of the person, or someone else;
- threatening to commit suicide or self-harm to torment, intimidate or frighten the person;
- causing or threatening to cause the death of, or injury to, an animal, whether or not the animal belongs to the person to whom the behaviour is directed, so as to control, dominate or coerce the person; and
- unauthorised surveillance of a person or unlawfully stalking a person.

Impacts of domestic and family violence

Children who live in homes where there is domestic violence grow up in an environment that is unpredictable, filled with tension and anxiety and dominated by fear. This can lead to significant emotional and psychological trauma, similar to that experienced by children who are victims of child abuse.

Instead of growing up in an emotionally and physically safe, secure, nurturing and predictable environment, these children are forced to worry about the future; they try to predict when it might happen next and try to protect themselves and their siblings. Often getting through each day is the main objective so there is little time left for fun, relaxation or planning for the future. Children living with domestic violence suffer emotional and psychological trauma from the impact of living in a household that is dominated by tension and fear.

These children will see their non-offending parent threatened, demeaned or physically or sexually assaulted. They will overhear conflict and violence and see the aftermath of the violence such as their non-offending parent's injuries and traumatic response to the violence. Children may also be used and manipulated by the abuser to hurt their non-offending parent.

Impacts of domestic and family violence on children include:

- poor concentration;
- aggression, hyperactivity, disobedience;
- disturbed sleep and nightmares;
- withdrawal and low self-esteem;
- showing no emotion ('spaced out');
- always on edge or wary;
- fantasise about normal home life;
- pessimism about the future;
- physical symptoms and physical injuries;
- depression and anxiety;
- take on a caretaker role prematurely;
- poorly developed communication skills;
- parent-child conflict and abuse of parents;
- shame;
- eating disorders;
- low academic achievement;
- school avoidance;
- staying away from home or leaving home early;
- feeling isolated from others;
- participating in dangerous risk-taking behaviours to impress peers;
- alcohol and substance abuse;
- difficulty communicating feelings;
- experiencing violence in their own dating relationships; and
- suicide.

The extent each child will be impacted varies depending on:

- the length of time the child was exposed to the domestic violence;
- the age of the child when the exposure began;
- whether the child has also experienced child abuse with the domestic violence;
- the presence of additional stressors such as poverty, community violence, parental substance abuse or mental illness and disruptions in family life;
- whether the child has a secure attachment to a non-abusing parent or other significant adult;
- whether the child has a supportive social network;
- whether the child has strong cultural identity and ethnic pride;
- the child's own positive coping skills and experience of success; and
- family access to health, education, housing, social services and employment.

Apart from the emotional, physical, social and behavioural damage abuse creates for children, statistics show that domestic and family violence can also become a learned behaviour. This means that children may grow up to think it is okay to use violence to get what they want and as adults that it is okay for there to be violence in their relationships.

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What is sexual abuse?

The *Education (General Provisions) Act 2006* (s.364) states that sexual abuse, in relation to a child under 18 years of age, includes sexual behaviour involving the child and another person in the following circumstances –

- (a) the other person bribes, coerces, exploits, threatens or is violent toward the child;
- (b) the child has less power than the other person;
- (c) there is a significant disparity between the child and the other person in intellectual capacity or maturity.

Sexual abuse occurs when an adult, stronger child or adolescent uses their power or authority to involve a child in sexual activity.

Secrecy, misuse of power and the distortion of adult-child relationships are key factors in the sexual abuse of children.

Other factors may also be a consideration when the person responsible for the abuse is an adolescent, another child or a female.

Types of sexual abuse

Sexual abuse can be physical, verbal or emotional and can include:

- kissing or holding a child in a sexual manner;
- exposing a sexual body part to a child;
- having sexual relations with a child;
- talking in a sexually explicit way that is not age or developmentally appropriate;
- making obscene phone calls or remarks;
- sending emails or text messages to a child;
- fondling a child in a sexual manner;
- persistently intruding on a child's privacy;
- penetrating the child's vagina or anus by either the penis, finger, or any other object;
- oral sex;
- rape;
- incest;
- showing pornographic films, magazines, or photographs to a child;
- having a child pose or perform in a sexual manner;
- forcing a child to watch a sexual act; and
- child prostitution.

Remember: perpetrators of sexual abuse can come from all walks of life.

Physical indicators of sexual abuse

Physical indicators include:

- injury to the genital or rectal area e.g. bruising, bleeding, discharge, inflammation or infection;
- discomfort in urinating or defecating;
- an unusual vaginal odour or discharge;
- pain/itching in the genital area, difficulty walking or sitting;
- presence of foreign bodies in vagina and/or rectum;
- sexually transmitted diseases;
- frequent urinary tract infections;
- pregnancy, especially in very young adolescents;
- anxiety related illnesses e.g. anorexia or bulimia;
- torn, stained or bloody clothing, especially underwear; and
- layers of clothing to hide injuries and bruises e.g. to breasts, buttocks and thighs.

Behavioural indicators of sexual abuse

Behavioural indicators include:

- disclosure of sexual abuse;
- regressive behaviour e.g. bed-wetting, soiling or speech loss;
- persistent and age-inappropriate sexual activity or comments e.g. excessive masturbation, rubbing genitals against adults, etc;
- displays of sexual knowledge, language or behaviour beyond what is expected for the child or young person's age or developmental level;
- inappropriate sexual play and/or behaviour with themselves, other children or dolls and toys;
- an unusual interest in or pre-occupation with sexual matters;
- sexually suggestive behaviour with adults or older children or young people;
- promiscuity or prostitution;
- poor social boundaries;
- poor/deteriorating relationships with adults and peers;
- fear of home, specific places or particular adults or running away from home;
- poor self-care or personal hygiene;
- sleeping difficulties;
- persistent psychosomatic complaints;
- depression, self-harm, drug or alcohol abuse, attempted suicide;
- refusing to undress in front of others for activities or often wearing layers of clothing;
- creating stories, poems or artwork about abuse;

- difficulty concentrating and being withdrawn or overly obedient; and
- sudden decline in academic performance, poor memory and concentration.

Impacts of sexual abuse

Short term impacts may include:

- behaviour problems and aggressiveness towards others;
- difficulties with emotional stress and anxiety;
- low self-esteem and self-loathing;
- problems with appropriate boundaries or personal space and use of sexual language;
- signs of serious distress such as depression and high levels of anxiety;
- chronic issues with problem sexualised behaviour;
- confused thoughts; and
- one or more signs similar to post-traumatic stress disorder including isolated flashbacks, bed-wetting, sudden changes in wanting to sleep with parents or being afraid of the dark.

Long term impacts include:

- impacts on the child's ability to feel safe, develop trust, and have positive intimate relationships in adult life;
- longer term psychological problems such as depression, anxiety, post-traumatic stress and poor self-esteem;
- impacts on the child's social and personal relationships;
- increased sense of hopelessness or helplessness to make positive changes in their world; and
- an inability to relate well to others.

Statistics relating to child sexual abuse

- Approximately 20% of girls and 8% of boys will experience sexual abuse before their 18th birthday.
- In approximately 85% of child sexual abuse cases, the child will know the offender.
- 84% of sexual victimisation of children under 12 years of age occurs in a residence.

What is 'grooming'?

Grooming is befriending and establishing an emotional connection with a child and their family, to lower the child's inhibitions for the purpose of sexual activity with the child (*Victorian Parliamentary Inquiry into the Handling of Child Sexual Abuse, 2013*).

In Queensland, grooming is a criminal offence. The *Criminal Code Act 1899* (s.218B) states that, any adult who engages in any conduct in relation to a person under the age of 16 years, or a person the adult believes is under the age of 16 years, with intent to facilitate the procurement of the person to engage in a sexual act, either in Queensland or elsewhere, or expose, without legitimate reason, the person to any indecent matter, either in Queensland or elsewhere, commits a crime.

For more information on grooming, please refer to *Resource Sheet 1E - Grooming*.

Myths and facts

Myth

Children make up stories or lie about sexual abuse.

Fact

Children seldom lie about sexual abuse. Children who have not been abused do not usually have explicit knowledge of intimate sexual behaviour. Research indicates that most reports of child sexual abuse are true.

Myth

If there is a problem, my child (or child under my care) would tell me.

Fact

73% of child victims do not tell anyone about the abuse for at least 1 year. 45% do not tell anyone for 5 years. Some never disclose.

Myth

If the child has already informed an adult, action has already been taken.

Fact

1 in 3 Australians would not believe a child if they disclosed sexual abuse.

What is Grooming?

Grooming refers to the process by which sex offenders groom people in the community, such as parents, carers, teachers and children to engage, establish trust and gain access to a child.

Sex offenders spend considerable time targeting, enticing and trapping a child for sexual purposes. Grooming involves the offender integrating themselves into places where they have access to children and then grooming the adults to create opportunities for the offender to abuse their victims.

Sexual abuse can happen abruptly, but more often is preceded by a period of 'grooming'. Abusers and victims often know one another for significant periods of time (a year or more is common) before the first abuse incident.

Grooming typically involves a graduation from attention-giving and nonsexual touching to increasingly more intimate behaviours. Much of this will appear ambiguous both to the victim and others who may observe it.

Victims

When survivors were asked what one thing could have made the difference to them as an abused child, the answer was to be believed.

- Girls are around twice as likely as boys to be sexually victimised. Girls are ALSO more likely to be abused repeatedly, in domestic settings, and at a younger age (average around 9-12 years).
- Boys are more likely to be abused over shorter periods, in non-familial settings, and at an older age (around 12-15 years).
- Victims of adolescent abusers are generally younger than for adult abusers.
- Vulnerability to sexual victimisation may be increased when the child is lonely or has problems at home and is emotionally needy or lacks confidence.
- Sexual victimisation may itself lead to further isolation from family and peers.
- Abuse by strangers, and abuse involving physical injuries, is more likely to be reported. In other circumstances victims can develop complex emotional bonds with their abuser and may feel responsible for the abuse.
- Disclosures are more likely to be made to a trusted friend, family member, or teacher, than directly to child protection authorities or to the police.

REMEMBER - Delayed reporting is common.

Offenders

- Offenders are most likely to be adolescent and adult males.

- Except for antisocial or psychopathic traits, in which case problem behaviours are likely to be generalised, there is no personality type that would indicate risk of sexual abusing.
- A potential abuser will appear normal, even ordinary.
- Some offenders may abuse purely for sexual gratification and will be indifferent to the experience of the victim. Others' motivations may involve a disorganisation of care-seeking, care-giving and sexual motivations.
- The situation may be made worse by efforts to avoid detection, which may include committing the child to secrecy, implied or actual threats, and in some cases violence (*Smallbone, 2013*).
- Offenders may not become conscious of sexual motivations until late in the grooming process, sometimes just before the first incident.
- Offenders' grooming will become more conscious and deliberate after the first incident (*Smallbone, 2013*).
- Child sex offenders groom children, their parents or carers and/or organisational representatives to build trusting relationships through which they can use children for their own sexual gratification (*Smallbone, 2013*).

Grooming behaviours

Some of the behaviours likely to be seen when a child is being groomed for abuse include:

- secrecy (probably the most important indicator);
- sharing of gifts/bribes;
- anything that will make the child feel special;
- isolating the child from family, friends and other support networks – creating an 'us (abuser and victim) versus others' style of relationship;
- regularly offering to babysit a child for free or take a child on overnight outings alone;
- insisting on physical affection such as kissing, hugging, wrestling or tickling even when the child clearly does not want it;
- insisting on time alone with the child with no interruption;
- taking and accumulating lots of pictures of children;
- sharing alcohol or drugs with children or adolescents;
- inappropriate sharing of personal information about the abuser to the child and inappropriate 'equality' in the relationship;
- being overly interested in the sexual development of a child;
- grooming the family and environment of the child; and
- gradual desensitisation of the child to touch and gradual sexualisation of the relationship.

People intent on grooming children are commonly charming and helpful, have insider status, and often go on the offensive when behaviour is challenged.

Worrying behaviours that may be grooming include:

- peer-like play with children;
- preference for the company of children;
- engagement in 'roughhousing' and tickling;
- touching games;
- failing to honour clear boundaries of behaviour; and
- seeking one-on-one contact with children. (*van Dam, 2001*)

Social networking sites and the internet have become important avenues for sexual offenders to target children and begin the grooming process. Sexual offenders may pose as other children to gain the trust and co-operation of intended child victims.

Impacts of grooming

Possible social impacts of grooming include:

- social skills inhibited;
- social isolation;
- lack of ability to relate to others;
- negative family relations;
- lack of trust in adults/parents; and
- increased likelihood of being bullied.

The psychological impacts of grooming and sexual abuse include:

- embarrassment;
- post-traumatic stress symptoms;
- self-harm;
- loss of confidence;
- aggression and violent outburst;
- normalisation of sexual actions and hypersexual development; and
- difficulty self-disclosing;
- the process of grooming directly leads to the child's continued silence; and the inability to disclose and discuss their abuse reinforces and exacerbates the long-term harm to the child and inhibits the ability to seek help. (*Whittle, Hamilton-Giachritsis & Beech, 2014*)

Online child sexual grooming

Online grooming is conducted in a similar fashion to grooming in the real world and is often a preliminary step to procuring, where the adult through the words and actions attempts to loosen the child's inhibitions regarding sexual activity or heighten their curiosity by sending pornographic material or talking about sexual matters (*CyberSafetySolutions, 2015*).

Please see *Resource Sheet 1E* for more information on Online Child Sexual Grooming.

Grooming is a criminal offence

In Queensland, grooming is a criminal offence. The *Criminal Code Act 1899* (s.218B) states that, any adult who engages in any conduct in relation to a person under the age of 16 years, or a person the adult believes is under the age of 16 years, with intent to facilitate the procurement of the person to engage in a sexual act, either in Queensland or elsewhere, or expose, without legitimate reason, the person to any indecent matter, either in Queensland or elsewhere, commits a crime.

(<https://www.legislation.qld.gov.au/legisln/current/c/crimcode.pdf>)

Statistics

- In approximately 85% of child sexual abuse cases, the child will know the offender (*NSW Commission for Children & Young People, 2009*).
- 84% of sexual victimisation of children under 12 occurs in a residence (*Snyder, 2000*).
- 1 in 3 Australians would not believe a child if they disclosed sexual abuse (*Australian Childhood Foundation, 2010*).
- 73% of child victims do not tell anyone about the abuse for at least 1 year. 45% do not tell anyone for 5 years. Some never disclose. (*Broman-Fulks et al, 2007*).

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Introduction

Recent advances in information and communications technologies have enabled adults with an inappropriate sexual interest in children to establish contact with children, develop relationships and to groom potential victims for sexual abuse (Krone, 2005).

Online predators use all forms of technology in order to connect with children. E-mail, instant messaging, bulletin boards, chat rooms, social media and gaming sites are all used to connect with a child and gain their trust (Cybersafety Solutions 2015).

What is online grooming?

Grooming, a premeditated behaviour intended to secure the trust and cooperation of children prior to sexual conduct, commences with sexual predators choosing a location likely to be attractive to children (AIC, 2008).

Online grooming is conducted in a similar way and is often a preliminary step to procuring, where the adult attempts to loosen the child's inhibitions regarding sexual activity or heighten their curiosity by sending pornographic material or talking about sexual matters.

The aim of the predator is to eventually physically meet the child for the purposes of sexual activity. The process often starts with sending pornographic images to normalise the requests and then moves to requesting naked images of the child or they perform a sex act on a web cam (Cybersafety Solutions 2015).

Unfortunately, children believe those who are 'nice' online will be the same in the real world and that they can identify a paedophile online and would not talk to one. As a result, children may take risks and many are on social networking sites, sharing personal information.

Online offenders are also increasingly adept at 'targeting' children who are vulnerable online, for example by not having privacy settings (Cybersafety Solutions 2015).

Both parents and teachers should be aware of the various types of online risks and what actions can be taken.

It is important to recognise that children may be reluctant or hesitant to inform teachers, parents, or guardians and adults in general, about potentially dangerous activities they encounter online out of fear of having limits placed on their use of internet or mobile phones.

What makes children vulnerable?

Children may be more vulnerable to online grooming because they:

- have undeveloped social skills;
- are less likely to pick up relevant cues during conversations (e.g. inappropriate remarks);
- have low self-esteem;

- lack of confidence; or
- are more naive.

Offenders

Relationship to the child

Offenders are often known acquaintances or family members. The offender may have known their victims in real life prior to using the internet and other communications technologies to further their grooming activities. One study found that in 85 - 95% of child sexual abuse cases, the perpetrator was someone the child knew.

Age of offender

In relation to the age of offenders, research shows that sexual offences against children can be committed by both adults and juveniles. A relatively high proportion of online sexual offenders are juveniles and this proportion appears to be increasing.

Criminal history of offender

In terms of recidivism, a significant percentage of sexual offenders do not have prior criminal histories involving offences against minors, or even nonsexual offences. However, many juvenile sexual offenders do continue their sexual offending into adulthood.

Characteristics

These individuals are often lone offenders, typically adult males, rather than offenders acting in concert. They tend to be inadequate in their social functioning and diverse in their psychopathology, often involving neurotic and compulsive behaviours.

Apart from personality characteristics, child sexual offenders carry out a range of patterns of offending, often involving multiple etiological pathways to child sexual abuse.

Impacts

There is clear evidence that sexual abuse during childhood and adolescence creates long-term problems for those who have been victimised. Many exhibit serious mental health problems as well as behavioural disorders and addictions. This occurs not only with children who experience offline sexual abuse, but also online exploitation.

Some research has found that the impact of grooming on victims is exacerbated if pornography is involved as this can make incidents more enduring in the minds of victims. Davidson (2007), for example, explained that children are re-victimised each time their image is accessed, with images on the internet forming a permanent record of abuse.

Research based statistics

- Young people were accessing the Internet at more places than parents realised, such as libraries, a parent's office and friends' houses.
- 45% of the young people had placed a personal profile on the Internet whereas only 17% of their parents believed this to be so.
- 81% of young people had a private e-mail account while 68% of their parents thought this was the case.
- Over half of the young people reported corresponding with strangers while 30% of parents believed this was happening.
- In terms of age and sex:
 - most sexual assault victims are pubertal girls, most often aged between 13 and 17 years;
 - preschool children of both sexes have also been victims of abuse; and
 - victims of online sexual exploitation are more likely to be female than the victims of other internet-related problems.

Criminal offences

A number of criminal offences relating to on-line child sexual grooming. Under the *Criminal Code Act 1899*:

- s.217 *Procuring young person etc. for carnal knowledge* (extract) - A person who procures a person who is not an adult or is a person with an impairment of the mind to engage in carnal knowledge (either in Queensland or elsewhere) commits a crime. Maximum penalty—imprisonment for 14 years.
- s. 218A *Using internet etc. to procure children under 16* (extract) - Any adult who uses electronic communication with intent to procure a person under the age of 16 years, or a person the adult believes is under the age of 16 years, to engage in a sexual act, either in Queensland or elsewhere, commits a crime. Maximum penalty – 10 years imprisonment
- ss. 228A, 228B, 228C and 228D are offences relating to producing, possessing and distributing child exploitation material.
- s. 229B *Maintaining a sexual relationship with a child*. Maximum penalty – Life imprisonment
- Under the *Criminal Code Act 1995* (Cwth):
- s.474.24 *Using a postal or similar service to procure persons under 16 years of age*. Penalty – Imprisonment for 15 years.
- s. 474.25 *Using a postal or similar service to "groom" persons under 16 years of age*. Penalty – Imprisonment for 12 years.

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For more information

- <http://www.thinkuknow.org.au/>
- <https://www.esafety.gov.au/>
- <https://www.police.qld.gov.au/programs/cscp/personalSafety/children/childProtection/>

Definitions and key terms

Child (s.8 Child Protection Act 1999 [the CPA])

A child is an individual under 18 years.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.8>

Child in need of protection (s.10 CPA)

A child may be in need of protection when the child has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; AND may not have a parent able and willing to protect the child from the harm. This is the 'reporting threshold'.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.10>

Child Protection Guide

An online tool, provided by Child Safety, to support professionals' decision making about where to refer families for support or report concerns to Child Safety.

<http://www.communities.qld.gov.au/childsafety/partners/our-government-partners/queensland-child-protection-guide>

Colleague (s.13H CPA)

A colleague means a person working in/for the same entity as the mandatory reporter, eg an SPO.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.13H>

Emotional abuse

Emotional abuse occurs when a child's social, emotional, cognitive or intellectual development is impaired or threatened. It can include emotional deprivation due to persistent: rejection, hostility, teasing/bullying, yelling, criticism and exposure to domestic and family violence.

Harm (s.9 CPA)

Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical abuse, psychological or emotional abuse, neglect or sexual abuse or exploitation.

Harm can be caused by a single act, omission or circumstance or a series/combination of acts, omissions or circumstances.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.9>

Inappropriate behaviour

Inappropriate behaviour means behaviour towards a child which is inconsistent with Professional Standards, Codes of Conduct and policies and is considered 'inappropriate behaviour' by the person making the complaint.

Mandatory reporter (relevant person) (s.13E CPA)

A mandatory reporter (relevant person) includes a:

- doctor;
- registered nurse;
- teacher;

- police officer;
 - person fulfilling a child advocate role in the Office of the Public Guardian;
 - an early childhood education and care professional including any individual, who is 18 years of age or older and who is not a volunteer, and who, under the *Education and Care Services Act 2013* or *Education and Care Services National Law*, is an Approved Provider, Nominated Supervisor or Educator.
- <https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.13E>

Neglect

Neglect occurs when a child's basic necessities of life are not met, and their health and development are affected. Basic needs include:

- food and adequate clothing;
- housing and hygienic living conditions;
- health care and timely medical treatment;
- personal hygiene; and
- adequate supervision.

Parent (s.11 CPA)

A parent is the child's mother, father or someone else (other than the chief executive of Child Safety) having or exercising parental responsibility for the child. A person standing in the place of a parent on a temporary basis is not a parent of the child. A parent of an Aboriginal or Torres Strait Islander child includes a person who, under Aboriginal tradition or Island custom, is regarded as a parent.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.11>

Parent able and willing

A parent may be able and willing to protect the child from harm when the parent has both the ability and the willingness to ensure the safety, wellbeing and best interests of the child. The parent's ability and willingness may be evident in their statements and direct or indirect actions.

Other factors that may impact on a parent's ability and willingness to care for and protect their child may include the parent's: alcohol or substance misuse; mental health concerns; domestic or family violence; and physical or intellectual disability.

Physical abuse

Physical abuse occurs when a child has suffered, or is at risk of suffering, non-accidental physical trauma or injury. Physical abuse can include:

- hitting or shaking;
- throwing or pushing;
- burning or scolding with hot water;
- cutting or biting; and
- poisoning.

Definitions and key terms

It is also important to remember that physical abuse does not always leave visible marks or injuries and it is not how bad the mark or injury is, but rather the act itself that causes injury or trauma to the child.

Reasonable suspicion (s.13C (2) & (3) CPA)

When forming a 'reasonable suspicion' consider the child's age and any detrimental effects on the child's body or psychological/emotional state evident, or likely to become evident in the future, including the nature, severity and likelihood that they will continue.

Your considerations about whether a child may be in need of protection could be informed by an observation of the child, other knowledge about the child or any other relevant knowledge, training or experience.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.13C>

Registered Nurse (Sch. 3 CPA)

A registered nurse means a person registered under the *Health Practitioner Regulation National Law* -

- to practise in the nursing and midwifery profession as a nurse, other than as a student; and
- in the registered nurses division of that profession.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sch.3>

Relevant information (s.159C CPA)

Relevant information includes information about a child, the child's family, someone else, a pregnant woman or an unborn child which is given to the chief executive for Child Safety, an authorised officer under the *Child Protection Act 1999* or a service provider, as defined in s. 159D of the Act.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.159C>

Reportable suspicion (s.13E (2) CPA)

A reportable suspicion is a reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering significant harm caused by physical or sexual abuse AND may not have a parent able and willing to protect the child from harm.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sec.13E>

SCAN (Suspected Child Abuse and Neglect) team

The purpose of the SCAN team is to enable a coordinated, multi-agency response to children where statutory intervention is required to assess and meet their protection needs. This is achieved by:

- timely information sharing between SCAN team core members;
- planning and coordination of actions to assess and respond to the protection needs of children; and
- holistic and culturally responsive assessment of children's protection needs.

School [Sched 3 - *Education (Accreditation of Non-State Schools) Act 2001*]

A School includes a school that is provisionally accredited, or accredited, under the *Education (Accreditation of Non-State Schools) Act 2001*.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-2001-060#sch.3>

Sexual abuse

Child Safety describes sexual abuse as occurring when an adult, more powerful child or adolescent uses his or her power to involve a child in sexual activity. Sexual abuse can be physical, verbal or emotional and can include:

- kissing or holding a child in a sexual manner;
- exposing a sexual body part to a child;
- having sexual relations with a child under 16 years;
- talking in a sexually explicit way that is not age or developmentally appropriate;
- making obscene phone calls or remarks to a child;
- fondling a child in a sexual manner;
- persistently intruding on a child's privacy;
- penetrating the child's vagina or anus by penis, finger or any other object;
- oral sex;
- rape or incest;
- showing pornographic films, magazines or photographs to a child;
- having a child pose or perform in a sexual manner;
- forcing a child to watch a sexual act; and
- child prostitution.

Teacher (Schedule 3 s CPA)

A teacher is defined as an approved teacher under the *Education (Queensland College of Teachers) Act 2005* employed at a school.

<https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010#sch.3>

Visitor

A visitor to the school is any person who visits the school on a one off or regular basis to provide services [paid or unpaid] to the school. This includes contractors, consultants and presenters of one-off programs.

Volunteer

A volunteer means a person involved in 'formal volunteering' which is an activity which takes place in not for profit organisations /projects and is undertaken:

- to be of benefit to the community and the volunteer;
- of the volunteer's own free will and without coercion;
- for no financial payment; and
- in designated volunteer positions only.

Introduction

This resource sheet provides guidance on reporting, in accordance with the [Child Protection Act 1999](#) (the CPA) and the *Student Protection in Anglican Schools Policy* (the policy), by staff, volunteers and visitors to an Anglican school.

Discuss concerns before taking action

When a staff member, volunteer or visitor has concerns for a student or unborn child they must immediately discuss their concerns with an Student Protection Officer (SPO) or the Principal.

The SPO or Principal will then:

- identify any additional information known by the school;
- confer with the ASC Child Safety and Wellbeing Advocate, if required;
- consult the online Child Protection Guide, if necessary;
- help determine the most appropriate response;
- help complete the relevant form; and
- ensure supports are immediately provided to the student.

Reporting suspected abuse or neglect to Child Safety

Mandatory reporters

All mandatory reporters (teachers and registered nurses) must, in accordance with [s.13E of the CPA](#) and the *Student Protection in Anglican Schools Policy* (the policy), report to Child Safety when they reasonably and honestly suspect:

- a child may have suffered, may be suffering or may be at risk of suffering significant harm as a result of physical, sexual or emotional/psychological abuse or neglect and may not have a parent able and willing to protect the child; or
- an unborn child may be at risk of significant harm after birth and may not have a parent able and willing to protect the child from harm.

Other staff, volunteers and visitors

All other school staff, volunteers and visitors must, in accordance with the policy, immediately discuss suspected physical, sexual, emotional/psychological abuse or neglect or unborn child concerns with an SPO or the Principal.

The SPO or Principal must ensure the concerns are reported to Child Safety when they suspect the child or unborn child may be in need of protection.

Further information

Refer to Sections 5 and 6 of the *Student Protection in Anglican Schools Procedures* (the procedures) for further information about roles and responsibilities when reporting to Child Safety, including actions and decisions by the SPO and/or Principal.

Reporting suspected sexual abuse or likely sexual abuse to police

In accordance with ss.366 and 366A of the [Education \(General Provisions\) Act 2006](#) and the policy, all staff, volunteers and visitors must immediately give a written report to the Principal when they suspect the sexual abuse or likely sexual abuse of a student by any person. The Principal must then ensure the written report is immediately given to the police.

When the concerns are identified by the Principal, the Principal must immediately give a written report about the suspected sexual abuse or likely sexual abuse of a student by any person to the police and provide a copy of the report to the Director of the school's governing body, or their delegate – the delegate for **owned and controlled schools**, as approved by Diocesan Council, is the Director of Professional Standards (DPS).

When the concerns relate to the Principal, a written report about the suspected sexual abuse or likely sexual abuse must immediately be given to the DPS (owned and controlled schools) or the Director of the school's governing body, or their delegate, (separately incorporated schools). The DPS or Director/delegate, must then forward the written report to police.

Further information

Refer to Section 7 of the *Student Protection in Anglican Schools Procedures* (the procedures) for further information about roles and responsibilities when reporting to police, including actions and decisions by the SPO and/or Principal.

Protection from liability

Confidentiality of notifier details

[Section 186 of the CPA](#) provides confidentiality for all individuals who report suspected harm or risk of harm to a child or unborn child to Child Safety or the police. The reporter's identity will not be disclosed to any other person unless the person who made the report gives consent or disclosing the reporter's information is permitted or required by law.

Protection from liability

[Section 197A of the CPA](#) offers protections for any person who, when acting honestly and reasonably, reports suspected harm or risk of harm to a child or unborn child or confers/consults with a colleague. In such cases, the person:

- will be protected from liability in any civil, criminal, administrative or defamation proceedings;
- will not have breached any code of ethics/standards of professional conduct;
- will not have contravened any other Act, oath or rule of law; and
- will not be liable to disciplinary action.

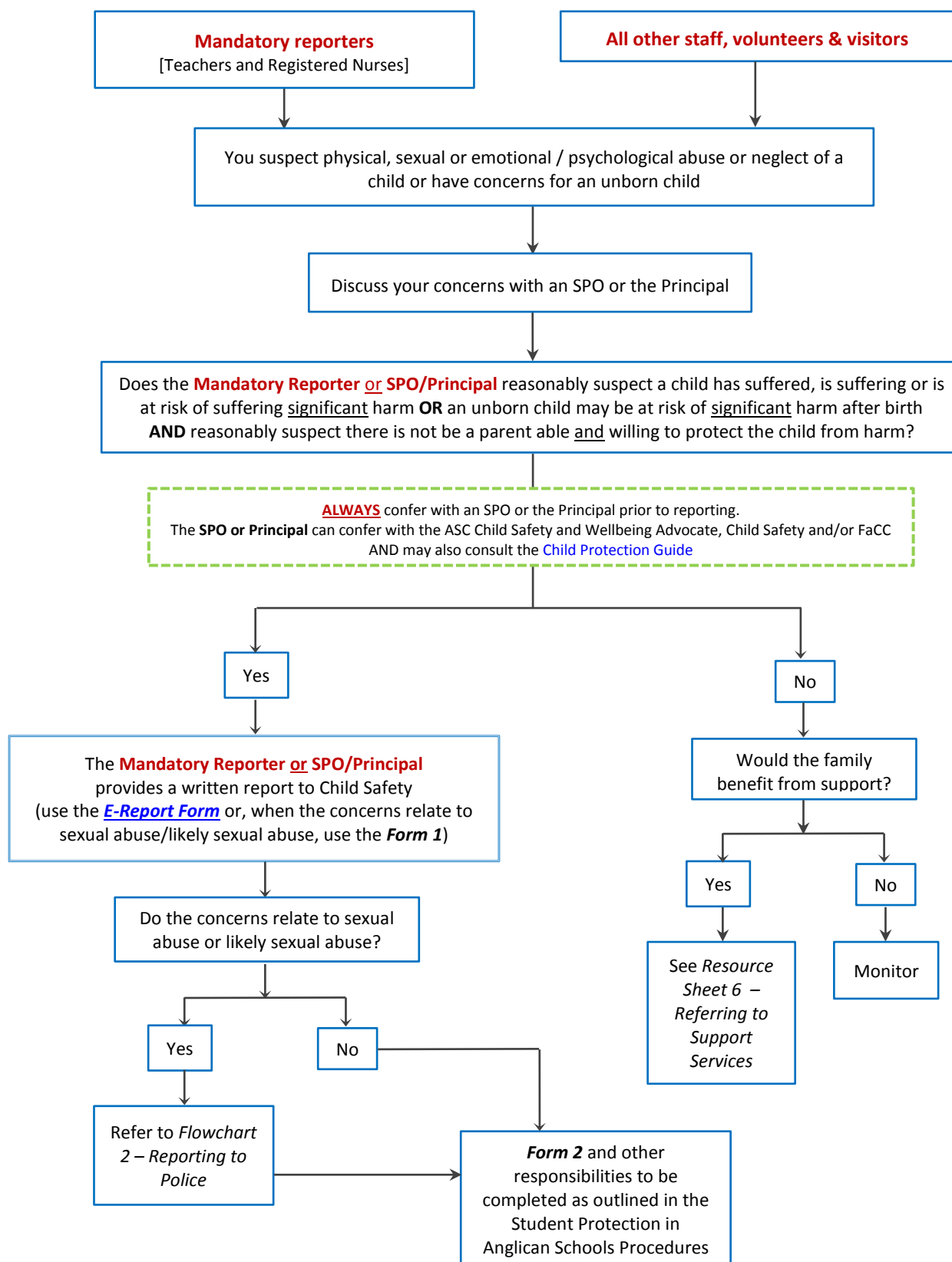
Similarly, [ss.366 \(5-6\) and 366A \(7-8\) of the Education \(General Provisions\) Act 2006](#) also state that, any person who makes a report about sexual abuse or likely sexual abuse of a student is not liable, civilly, criminally or under an administrative process for giving the information contained in the report to the police, would have a defense in defamation proceedings and would not be contravening confidentiality requirements under another Act, oath, rule of law or practice.

Reporting forms

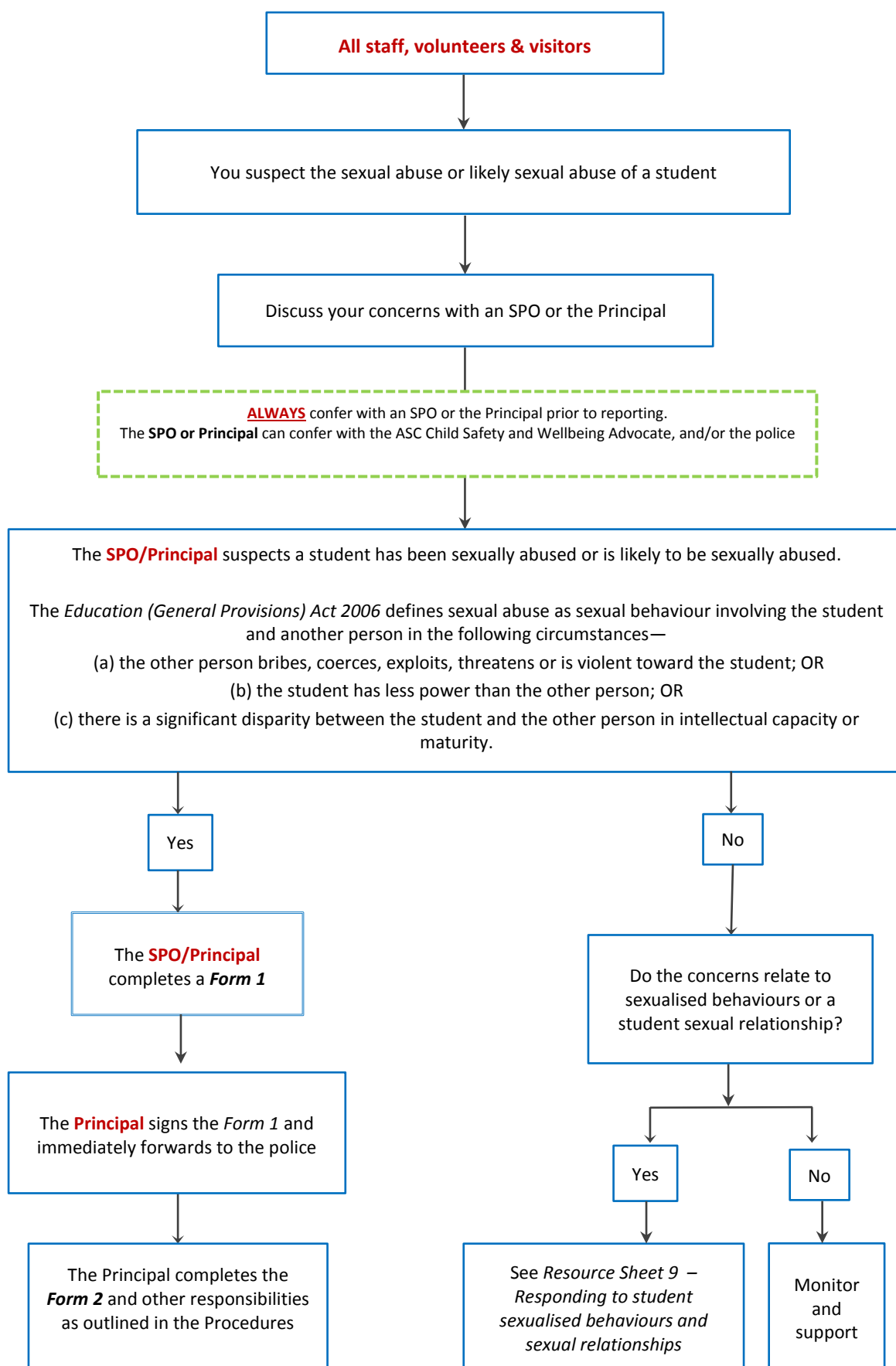
The following forms have been provided for use by schools when reporting suspected student protection concerns.

Form	When to use the form
E-Report FORM Available at https://secure.communities.qld.gov.au/cbir/home/ChildSafety#	Use this form to report to Child Safety when you suspect a student may be in need of protection as a result of: <ul style="list-style-type: none"> • physical abuse • emotional/psychological abuse or • neglect. You should also use this form to report when an unborn child may be in need of protection after birth.
FORM 1 Suspected Sexual Abuse or Likely Sexual Abuse Report	Use this form to report to police and/or Child Safety when you suspect a child has been sexually abused or is likely to be sexually abused.
FORM 2 Notification of Reportable Suspicion of Sexual Abuse / Likely Sexual Abuse or Harm to a State Authority	Use this form to notify the Director of Professional Standards (owned and controlled schools) or the Chair/delegate (separately incorporated schools) that you have made a report about suspected child abuse or neglect to Child Safety or the police.
FORM 4 Harm concerns advice form	Use this form to record suspected abuse or neglect that does not meet the threshold for a report to Child Safety – once completed, store securely.
Request for Interview Form	Use this form when a request is made by Child Safety or police to the school to interview a child in accordance with s.17 of the CPA.
Request for Information Form	Use this form when a request is made to share information known by the school with: <ul style="list-style-type: none"> • Child Safety • Police • a prescribed entity.

Flowchart 1 – Reporting to Child Safety



Flowchart 2 – Reporting to the police



Determining if a parent may not be able and willing to protect their child

A person may reasonably suspect a parent may **not** be able and willing to protect their child from harm when the person believes the parent may not have both the ability and the willingness to ensure the safety, wellbeing and best interests of their child.

A parent's ability and willingness to protect their child may be evident in the parent's:

- statements; and
- their direct and indirect actions.

The person might also need to consider whether any other factors may be significantly impacting on a parent's ability or willingness to care for and protect their child. This could include factors such as suspected or known:

- alcohol or substance misuse;
- mental health concerns;
- domestic or family violence; and
- physical or intellectual disability.

The table below gives examples that may help when considering a parent's ability and willingness to protect a child.

You suspect that a parent <u>MAY BE</u> able and willing to protect their child because....	You suspect that a parent <u>MAY NOT BE</u> able and willing to protect their child because....
you speak, for the second time, with the parent about your concerns in relation to their child's inappropriate sexual behaviour towards other children in their class. The parent tells you they tried to deal with the issue after the first incident but don't know what to do and agree to a referral to a local specialist counselling service.	you speak, for the second time, with the parent about your concerns in relation to their child's inappropriate sexual behaviour towards other children in their class. The parent becomes very confrontational and says the teacher is persecuting them. The parent refuses to acknowledge there is a problem and says other children must have been responsible.
you speak with the parent about your concerns for their child who has become very fearful and has told you they're scared of their older brother who physically assaults and verbally abuses them. The parent appears unaware of the issue and states they will address the behaviour with the older brother and seek counselling for the child to build their resilience.	you speak with the parent about your concerns for their child who has become very fearful and has told you they're scared of their older brother who physically assaults and verbally abuses them. The parent says the child just needs to grow up and that he should give him a good belting for causing so much trouble.
you speak with the parent about your concerns for their 9 year old child who had no lunch or breakfast on a few occasions and told you they were left alone at home while the parent went to work. The parent says they hadn't thought about this causing their child stress and agreed to speak with their sister about baby sitting and a referral to a local support service.	you speak with the parent about your concerns for their 9 year old child who had no lunch or breakfast on a few occasions and told you they were left alone at home while the parent went to work. The parent doesn't return your calls and incidents continue.
you speak with the parent about your concerns for their child who's been self-harming and has suicidal thoughts. The parent acts immediately to access appropriate mental health services.	you speak with the parent about your concerns for their child who's been self-harming and has suicidal thoughts. The parent belittles the child or minimises the concerns and refuses to obtain any mental health support.
you're aware the parent has been experiencing some ongoing financial and relationship issues but they are working with an Intensive Family Support Service to try to address the issues.	the parent told you they were trying to work on their issues but then they didn't work with support services - they didn't attend appointments or take up the support offered.

You suspect that a parent <u>MAY BE</u> able and willing to protect their child because....	You suspect that a parent <u>MAY NOT BE</u> able and willing to protect their child because....
the parent seems to be trying to make the changes suggested by support professionals to address the previously identified child protection concerns.	the parent attends appointments with support services or professionals but then doesn't try to make the changes suggested to address the concerns.
the parent is aware of their child's medical condition and the medical care required and the parent does get the recommended medical treatment.	the parent's aware of their child's medical condition and the medical care required but they choose not to get the recommended medical treatment.
the parent tells you their spouse left the family, they've started drinking, aren't coping and can't take care of their children properly. The parent agrees to a referral to Family and Child Connect (FaCC).	the parent tells you their spouse left the family, they've started drinking, aren't coping and can't take care of their children properly. The parent refuses a referral to FaCC and tells you they don't need anyone sticking their nose in their business.

Seeking further information

School staff are not required to investigate student protection concerns before making a report to statutory authorities. School staff should not carry out any systematic or formal inquiry into a student protection matter including:

- interviewing any individuals involved in the matters;
- examining the facts of a student protection report; or
- making a determination about whether a student may be in need of protection.

However, the SPO or Principal may seek information from a student or relevant school staff to the extent necessary to clarify whether the matter reaches the threshold for a student protection report or to determine an appropriate course of action.

If the mandatory reporter, SPO or Principal believes significant harm has occurred or is likely to occur but they have limited information about whether a parent may be able and willing to protect the child, the mandatory reporter, SPO or Principal should not attempt to gather more information about the parents. Instead, the mandatory reporter, SPO or Principal should make a report to Child Safety and indicate that there may not be a parent able and willing to protect.

Intake

When concerns are reported, Child Safety Officers will decide the best response, taking into account the need to ensure the child's safety, while respecting the diversity of family values, lifestyles and culture.

Initial information required by Child Safety staff includes:

- the student's name, age and address;
- the reasons for suspecting the student may have experienced or may be at risk of experiencing harm;
- any immediate risks to the student's safety; and
- the notifier's contact details - the notifier may remain anonymous, however it is preferable to provide these details so the officer can call the notifier back if further information is needed.

Possible Child Safety responses

A **Child Concern Report** is recorded when child protection concerns do not reach the threshold for a notification. At this point the person who notified Child Safety may be given information, advice or make a referral to another agency to assist the child and family.

If child protection concerns suggest a child has been significantly harmed, or is at risk of significant harm, and does not have a parent able and willing to protect them from harm, a **Child Protection Notification** is recorded.

A notification is also recorded when there is suspicion that an unborn child may be at risk of harm after birth.

Investigation

If a notification is recorded, Child Safety will assess the concerns by completing an **investigation and assessment (I&A)**. Officers will interview the child, family and other relevant people, such as school staff, the family's doctor or relatives.

The police may also be involved, particularly if the concerns relate to physical or sexual abuse.

Following a full assessment, a decision will be made about whether it is possible to address the child's protective needs by supporting and assisting the family.

In many cases, the child will be able to remain at home and be protected within their family. To ensure the child is safe and their needs are being met, the family may require support from Child Safety and other community agencies.

When suspected child abuse is reported to Child Safety or the police, the notifier's details will remain confidential and their identity will be strictly protected.

Moving a child to a safe place

A child can be moved to a safe place during the I&A when:

- the child is under 12 years of age;

- a parent or other member of the child's family is not present and cannot be located; and
- it is not considered necessary to take the child into custody to ensure their protection (the circumstances are not apparently due to neglect or abandonment).

A safe place can be:

- the home of a neighbour who knows the parents;
- the home of a relative or friend;
- a hospital;
- an approved foster placement;
- a Child Safety Service Centre; or
- a police station.

What happens when a child is removed from their family?

When a child needs to be removed from their family, Child Safety will take action to ensure the child's ongoing safety and wellbeing including ensuring the child is placed in a caring home environment that meets his or her needs.

A child might be placed away from home for a short time, while further assessments are undertaken, or for longer, if it is decided they cannot safely live with their family.

A child who is living away from home is said to be 'in care'. Children in care may be placed with extended family or family friends (kinship carers), with other families (foster carers) or in residential care homes supervised by paid workers.

If a child is living away from their family, a Child Safety Officer will organise a placement meeting with the carer to provide important information about the child including their emotional and developmental needs, personal history and special requirements.

Arrangements will also be made for contact with the child's parents, siblings, relatives and friends, as well as providing advice on support and advocacy services. This ensures a smooth transition at a difficult time.

Child Safety and police roles

Child Safety is responsible for investigating and assessing alleged significant harm or risk of significant harm to a child when there may not be a parent able and willing to protect the child from harm.

Child Safety and the police will undertake joint investigations in some circumstances.

The police have primary responsibility for undertaking any criminal investigation including those in relation to suspected sexual abuse or likely sexual abuse.

Following an I&A, Child Safety is able, under information sharing provisions, to communicate the outcome of the I&A to the Principal so the school can offer ongoing support and monitoring.

Interviews conducted with children at the school by the police and/or Child Safety

The police and/or Child Safety may conduct interviews with a child at the school to:

- obtain a statement as part of an investigation into the possible commission of a criminal offence; or
- assess the child's need for protection and take any necessary actions to secure their safety.

Can police/Child Safety ask to interview a student at the school?

Under [s.17 of the Child Protection Act 1999](#), Child Safety and police do have power to request to interview a student at the school. Prior to interviewing a student at the school, either a police officer or Child Safety Officer will notify the Principal of the intention to exercise their legislative power.

NOTE: When such a request is made, the Principal should complete the Request for Interview Form and file the form in a secure location with other student protection records.

Sufficient information should be provided to the Principal to enable the Principal to make an informed decision about approving the interview.

Who conducts the interviews?

Interviews may be conducted jointly by the police and Child Safety or by officers from either agency.

Who can be a support person for the student?

The police and Child Safety are responsible for ensuring the child feels safe and supported during the interview and the officers will exercise discretion when considering whether to allow a support person to be present during the interview.

The school also has a responsibility to exercise their duty of care to students while in the school's care. As a result, wherever possible, it would be desirable for a support person to be present for interviews conducted with students at the school.

When considering the student's need for a support person, the police and Child Safety will consider the student's age, maturity and any other relevant factors. If it is identified that a support person is required, the Principal will select an appropriate staff member to be present during the interview. In all interviews of this nature, the student should also be comfortable with the support person chosen.

What is the role of the support person?

The role of the support person is to support the student during the interview.

The roles and responsibilities of all persons involved, including the support person, will be clarified by the interviewing officers prior to and during the interview.

During an interview, the presence of other people, especially if they hold a position of authority, may reduce the likelihood of a student disclosing harm or risk of harm.

To minimise any potential issues and ensure the student feels safe and supported, the interviewing officer will:

- ask the student whether they are comfortable with the support person present;
- advise the student and support person where the support person will sit;
- advise the support person not to talk or make any actions that may disturb or influence the student; and
- advise the student they should not consult the support person during the interview.

Where should the interview take place?

All efforts should be made to use a private room where the student will feel comfortable. The interviewing officers should be consulted about the selection of the most appropriate room.

What are the legal implications of the support person role?

In accordance with s.93A of the *Evidence Act 1977*, any person present when a child provides their statement may be called as a witness to a court proceeding.

Therefore, any staff member present as a support person during the interview may be required to provide a written and signed statement, attend court and give evidence as a result of their attendance at the interview.

What happens after the interview?

As soon as reasonably practical after the interview, the police and Child Safety will advise the school of future actions to be taken and any immediate support needs for the student.

Advising the parents of the contact with the child is the responsibility of police and/or Child Safety and will be undertaken as soon as practicable after the interview, unless the officers reasonably believe someone may be charged with a criminal offence and advising the parents may jeopardise an investigation into the offence or may expose the child to harm.

Purpose of the SCAN team

The purpose of the Suspected Child Abuse And Neglect (SCAN) team is to enable a coordinated, multi-agency response to children when statutory intervention is required to assess and meet the child's protective needs by:

- timely information sharing between SCAN team core members;
- planning and coordination of actions to assess and respond to the protection needs of children who have experienced harm or risk of harm; and
- holistic and culturally responsive assessment of protective needs.

Members of the SCAN team

Child Safety is recognised within legislation as the lead agency for the SCAN team. The core member agencies are:

- Child Safety;
- Queensland Police Service;
- Queensland Health;
- Department of Education and Training [DET] (also representing the non-state schools and Education and Care Services); and
- the Recognised Entity (for matters relating to Aboriginal and Torres Strait Islander children).

The role and responsibilities for SCAN team members and the relevant information sharing protocols are outlined in [ss.159I - 159L of the Child Protection Act 1999](#) (the Act). Personal information collected by DET for provision to SCAN teams is managed in accordance with the Act.

Location of SCAN teams

Currently there are 21 SCAN team co-ordination points across Queensland, which are aligned with the designated SCAN Team Coordinators. There are 30 operational SCAN teams across the State including:

- | | | |
|-----------------------|-----------------------|-------------------------------|
| • Browns Plains | • Gold Coast Southern | • Redcliffe |
| • Bundaberg | • Gympie | • Rockhampton |
| • Cairns | • Inala | • Stones Corner/Brisbane City |
| • Cape Torres | • Ipswich | • Stones Corner/Bayside |
| • Chermside | • Logan | • Sunshine Coast |
| • Fortitude Valley | • Mackay | • Toowoomba |
| • Gold Coast Northern | • Mt Isa | • Townsville |

Who attends SCAN team meetings

DET has delegated Senior Guidance Officers to be the core members authorised to represent DET, the non-state schools and Education and Care Services at SCAN team meetings. Their role is to assist education staff with the referral of cases to SCAN team meetings and to provide information, if requested.

Senior Guidance Officers attend SCAN meetings and provide information collected from school personnel for case reviews. In addition, they will ensure relevant information about the outcomes from SCAN Team discussions is provided to Principals in a timely way and in accordance with confidentiality and privacy requirements.

The Principal may, from time to time, be asked by the DET core member representative to provide information to a SCAN Team.

What is an ICM

The SCAN team system also includes provision for Information Coordination Meetings (ICM). These meetings provide a forum for discussion of matters where a SCAN team core member representative seeks further information about the rationale for a Child Safety intake decision and requires the opportunity for multi-agency discussion.

Further information

If further information is required about SCAN Teams or concerns are held about requests for information by a SCAN team, please contact the Student Protection Support Officer, ASC at ascstudentprotection@anglicanchurchsq.org.au.

Student Resource Sheet 3-D: Child Safety & Police Contacts

School Staff access only:

<https://stpaulsqld.cspace.net.au/Assets/1373/1/ResourceSheet3D-ChildSafetyandPoliceContacts-ACSQ.pdf>

Introduction

Responding to suspected student protection concerns can be a difficult and complex task, particularly for individuals whose primary role is not in a child protection agency.

Staff and volunteers of Anglican schools are not required to investigate concerns when they suspect a child may have been harmed or may be at risk of harm. However, they will need to decide whether the concerns must be reported Child Safety.

As soon as they have concerns for a student's safety or wellbeing, staff, volunteers and visitors must immediately discuss the concerns with a Student Protection Officer (SPO) or the Principal, who can:

- seek advice from the Student Protection Support Officer, Anglican Schools Commission;
- consult the online Child Protection Guide (CPG);
- use their own professional judgement;
- confer with a colleague at the school;
- contact the Child Safety Regional Intake Service (RIS); or
- contact the local Family and Child Connect (FaCC).

The *Child Protection Act 1999* allows mandatory reporters to confer with relevant colleagues and share information to help them form a reasonable suspicion that a child may be in need of protection or to take appropriate action to protect a child from harm or suspected harm.

This Resource Sheet provides information on the online CPG which is a decision support tool provided by Child Safety for other professionals.

Please note: The CPG does not assist with decision-making about reporting suspected sexual abuse or likely sexual abuse to the police. All suspected sexual abuse and likely sexual abuse must be immediately reported to the police irrespective of whether the parent may be able and willing to protect.

What is the Child Protection Guide (CPG)

The CPG is a tool provided to support professionals, such as school staff, teachers, police officers, doctors and nurses, when deciding the most appropriate response to concerns for a child's safety or wellbeing.

The CPG was developed by Child Safety, the Children's Research Centre, and Queensland Government and non-government agencies to ensure professionals meet their reporting obligations, including reporting serious concerns to Child Safety, while also enabling families in need to access required support services without unnecessary statutory child protection intervention.

The CPG supports professionals in their decision making by:

- focusing on critical factors;
- clearly identifying the threshold for reporting to Child Safety;
- identifying ways to support a family where the concerns do not require a report to Child Safety;
- ensuring reporting obligations are met;
- providing a consistent and objective framework for analysing concerns; and
- promoting shared principles, language and thresholds across the system.

When making decisions about whether to refer or report child protection concerns, staff are encouraged to work through the CPG with the assistance of an SPO or the Principal. The CPG is designed to complement critical thinking and does not preclude or replace any course of action a professional reasonably believes is appropriate.

Where child protection concerns do not meet the threshold for a report to Child Safety, the CPG helps professionals determine the most appropriate referral pathway to ensure at-risk families access the support they need.

Remember: Using the CPG does not replace Child Safety reporting or referral processes.

How the CPG works

The CPG asks a series of 'yes or no' questions about the concerns and provides a recommended 'decision point' based on the answers provided. The possible outcomes that may be recommended include:

- report to Child Safety;
- refer to Family and Child Connect (FaCC);
- refer to an Intensive Family Support (IFS) service;
- refer to another support service; or
- report not required – document decision, provide referrals as appropriate, monitor and support.

Where to find the CPG

You can access the online CPG on the Child Safety website at -

<https://secure.communities.qld.gov.au/cpguide/engine.aspx>

Tips for using the CPG

- To assist with accurately answering the questions in the CPG, read the definitions provided on the right hand side.
- Write down the reasons you are answering questions a particular way. This information can be a useful record and helps to provide the content for any possible report to Child Safety.

Further information on using the CPG

You can access the *Child Protection Guide Procedures Manual* and Introductory Training Module from

<https://www.communities.qld.gov.au/childsafety/partners/our-government-partners/queensland-child-protection-guide>.

Introduction

This resource provides guidance on reporting suspected inappropriate behaviour towards a student by school staff and volunteers under the *Student Protection in Anglican Schools Policy*.

What is inappropriate behaviour

Inappropriate behaviour is any behaviour, including words, of a Principal, staff member or volunteer towards a student, regardless of the student's age, which is inconsistent with the individual's position and/or terms of employment contract and relevant Church Canons, policies, Professional Standards and/or Codes of Conduct including:

- the [Code of Conduct](#) - The Corporation of the Synod of the Diocese of Brisbane;
- any school specific Code/s of Conduct;
- the *Safe Ministry to Children Canon 2017* – Anglican Church of Australia – Diocese of Brisbane
- the [Professional Standards Canon](#) – Anglican Church of Australia – Diocese of Brisbane;
- the [Professional Standards for Queensland Teachers – Queensland College of Teachers](#)
- the [Code of Ethics for Teachers in Queensland](#) – Queensland College of Teachers (QCT);
- the [Professional boundaries: A Guideline for Queensland Teachers](#) – QCT; and
- the standards and codes outlined in the *Counselling Services in Anglican Schools Policy*.

School staff and volunteers must also comply with requirements outlined in Anglican Schools Commission (ASC) or school policies in relation to online interactions with students via electronic communication and/or social media applications.

School staff and volunteers are expected to behave in a manner that is supportive of the safety and wellbeing of students. Behaviour of a sexual, physical or psychological/emotional nature which exploits the special position of trust and authority between the staff member or volunteer and a student is unacceptable and is a breach of legal obligations and policy requirements.

Such inappropriate behaviour may include, but is not limited to:

- transporting a student or seeking to visit a student at home without the written consent of a parent and the approval of the Principal;
- inviting a student to the staff member or volunteer's home;
- sending or receiving correspondence of an inappropriate nature;
- inappropriate giving of gifts;
- physical or emotional aggression, violence or bullying;
- sexual exhibitionism;
- exposing a student to pornographic material in any medium;
- development of an intimate relationship incompatible with the professional relationship;
- inappropriate discussion of sexual matters;
- use of obscene language, especially of a sexual nature;
- gestures, actions or jokes of a suggestive, obscene or sexual nature while in a student's presence;
- voyeurism (gaining pleasure from secret watching of another);
- repeatedly seeking to be alone with a student; or
- detaining a student in locked facilities or facilities that do not have immediate access to other staff.

Any behaviour which exploits a student or which causes physical or emotional/psychological harm to a student is unacceptable.

Reporting inappropriate behaviour by a staff member or volunteer

All staff, volunteers and visitors **must**, as soon as practicable, discuss all suspicions of inappropriate behaviour by a staff member or volunteer towards a student with an Student Protection Officer (SPO) or the Principal, including providing the SPO or Principal with any records.

Note: If the matter relates to alleged sexual abuse or likely sexual abuse also refer to *section 7 of the Student Protection in Anglican Schools Procedures*.

The SPO must:

- obtain as much information as possible from the staff member, volunteer or visitor about the suspected inappropriate behaviour;
- include this information in the *Form 3*;
- provide the *Form 3* to the Principal; and
- provide any records or forms associated with the matter to the Principal.

The Principal must:

- review and finalise the *Form 3*;
- immediately email a copy of the *Form 3* to the Director of Professional Standards (DPS) [owned schools] or the Chair of the governing body [separately incorporated schools];
- as required, consult with the Student Protection Support Officer (ASC), DPS or Chair;
- if the matter does not involve a report to the police, inform the parent of the matter and the actions being taken in response. If the matter does involve a report to the police, seek police guidance prior to informing parents of the matter;
- ensure an investigation is completed and documented as per policy and procedures;
- notify the Queensland College of Teachers (QCT) when the concerns relate to a teacher registered with the QCT;
- provide a report about the investigation, including proposed outcomes and actions, to the DPS or the Chair;
- ensure all recommendations in the report are actioned within given timeframes; and
- store all records in line with records management policy and procedures.

Reporting inappropriate behaviour by the Principal

When the concerns relate to the Principal, the staff member, volunteer or visitor **must** immediately:

- discuss any concerns with an SPO;
- provide information to the SPO about the suspected inappropriate behaviour; and
- provide any records associated with the matter to the SPO.

The SPO will:

- complete the *Form 3*; and
- immediately email the *Form 3* to the DPS [owned schools] or the Chair of the governing body [separately incorporated schools].

The DPS or the Chair will:

- note the information provided in the *Form 3*;
- notify the QCT when the concerns relate to a teacher registered with the QCT;
- if the matter does not involve a report to the police, inform the parent of the matter and the actions being taken in response. If the matter does involve a report to the police, seek police guidance prior to informing parents of the matter;
- ensure an investigation is completed and documented as per policy and procedures;
- ensure recommendations resulting from the investigation are actioned in specified timeframes; and
- ensure all records are stored securely.

Noting a staff member or volunteer's concerning behaviour

When information is received about behaviour of a staff member or volunteer which is of concern but not deemed to be inappropriate (as per section 5.5 of the Student Protection in Anglican Schools Policy), the Principal will:

- as required, consult with the Student Protection Support Officer, ASC;
- make a record of the behaviours using the *Form 4*; and
- continue to monitor and support the staff member or volunteer (refer to Section 11.5 of the Student Protection in Anglican Schools Procedures).

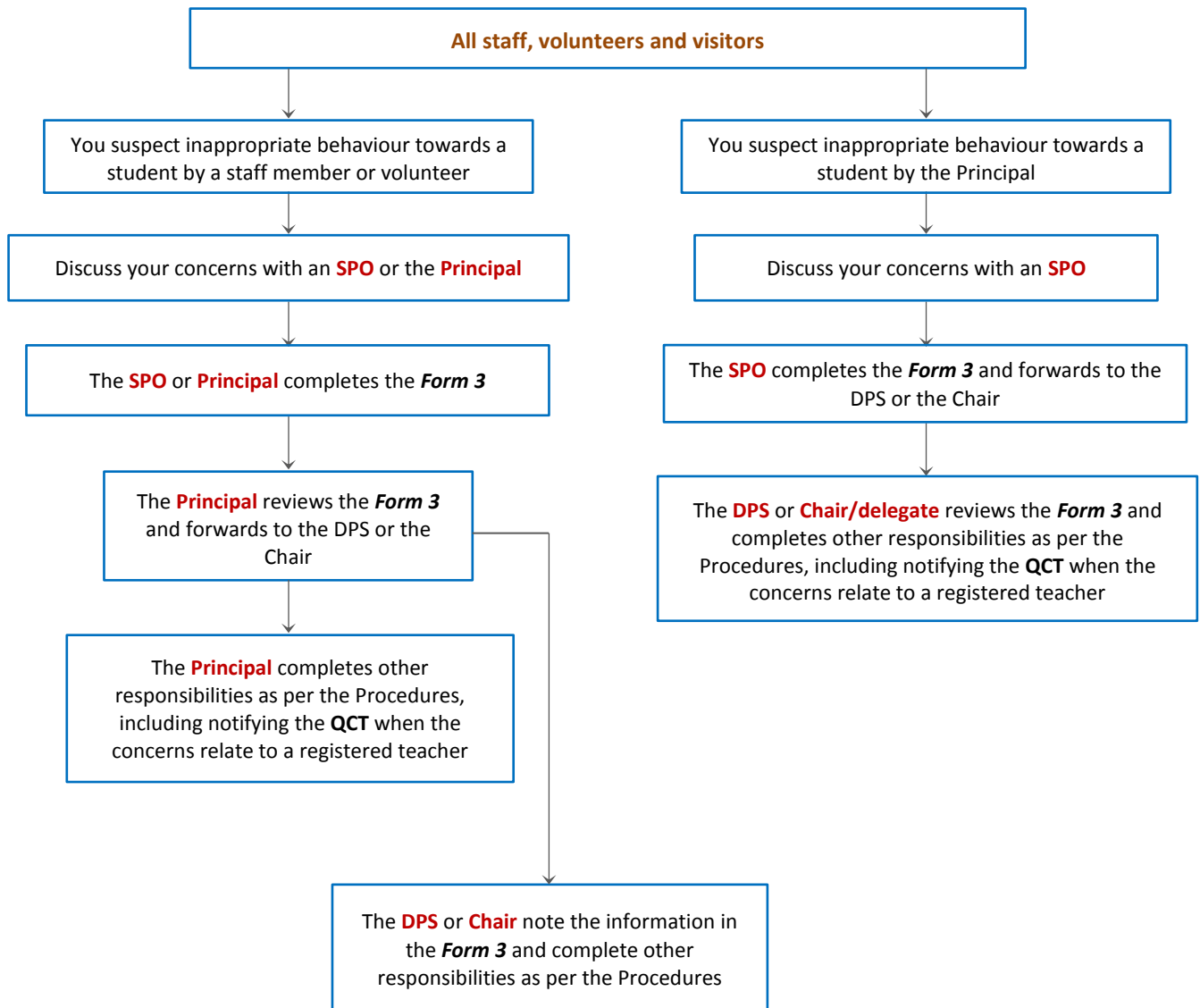
Reporting Forms

The following forms and templates have been provided for use when reporting suspected inappropriate behaviour.

Form	When to use the form
FORM 3 Report of Alleged Inappropriate Behaviour by a Staff Member or Volunteer	Use this form to notify the DPS or Chair/delegate about suspected inappropriate behaviour by: <ul style="list-style-type: none">• the Principal;• a staff member; or• a volunteer.
FORM 4 Record of Harm or Concerning Behaviour (Internal Use Only)	Use this form to record information about the behaviour of a staff member or volunteer which is of concern but is not deemed to be inappropriate behaviour – once completed, store the form on the relevant staff member's file.
QCT notification Templates QCT Section 76 (Investigation) QCT Section 77 (Resignation) QCT Section 78 (Dismissal)	Use these templates to notify the Queensland College of Teachers (QCT) when the alleged inappropriate behaviour relates to a teacher registered with the QCT.

All forms in relation to reporting inappropriate behaviour are available on the ASC ERM website or can be requested from the ASC at ascstudentprotection@anglicanchurchsq.org.au.

Flowchart – Reporting inappropriate behaviour



Introduction

As part of the Child Protection reform process in Queensland, a secondary referral pathway and stronger support system have been established to better meet the needs of vulnerable children and families. Twenty two (22) Intake and Referral Services, known as Family and Child Connect (FaCC), and 20 Intensive Family Support (IFS) Services are now operating across the State to divert families from involvement with statutory child protection services.

When a staff member or volunteer has a concern about possible harm or risk of harm to a child, or risk of harm to an unborn child, but the concerns do not meet the threshold for a report to Child Safety, the school can help the family by referring the family to relevant support services within the local community.

By referring students and families for support, the school can intervene early to help meet the student's and/or families' identified needs and try to divert them from involvement with the statutory child protection system.

What is Family and Child Connect (FaCC)?

FaCC provides information and advice to people who are seeking assistance for a family when there are concerns about a child's wellbeing. FaCC supports vulnerable families by assessing their needs and referring them to the most appropriate support service.

The role of FaCC is to:

- provide information, assessment and advice;
- actively engage with families and refer them to support services; and
- lead a local level alliance of government and non-government services.

Each FaCC also has a number of specialist staff who can advise on the most appropriate response to concerns.

- A Principal Child Protection Practitioner (PCPP), who is employed by Child Safety but based at FaCC, provides advice about whether concerns require a report to Child Safety or a referral to a support service.
- The specialist domestic and family violence practitioner, who is employed by the FaCC, provides advice and support regarding the effects of domestic and family violence.

Local Level Alliance

FaCC staff also lead an Alliance of local government and non-government services who work together to ensure the service system is able to meet the needs of children and families and provide timely support and services.

Referring to FaCC

Referrals can be made to FaCC:

- without consent (Principal only); or
- with consent by speaking with the student and/or parent prior to referral (SPO or Principal).

Prior to making a referral, with or without consent, the SPO or Principal can consult the [Child Protection Guide](#) and confer with the Student Protection Support Officer, Anglican Schools Commission (ASC).

Prior to making a referral to FaCC with consent, the SPO or Principal must ensure that a *Consent to Share Information/Referral Form* is completed and stored as per information sharing requirements. (see *Resource Sheet 11 – Information Sharing*)

Following receipt of a referral, FaCC staff will complete an initial assessment to determine the most appropriate response. Possible response options are outlined below.

Provision of information and advice

This response may include advice to the individual contacting FaCC about how to keep the family engaged with the referrer's service and information on local support services that could support the family.

Referral to a support service

This response will involve helping the individual contacting FaCC to refer the family to a support service. FaCC may assist with gaining the family's consent and help the referrer to engage with the local support service.

Active engagement and referral to an Intensive Family Support (IFS) service

Where families have multiple or complex needs, FaCC engages the family in a more detailed needs assessment and seeks their consent for a referral to an IFS service or other appropriate services.

Report to Child Safety

If FaCC receives information which suggests a child may be in need of protection, a report will be made by FaCC to Child Safety.

Information sharing with FaCC

Information about a student and/or family can also be shared with FaCC either without consent (Principal only) or with consent (SPO or Principal).

Prior to sharing information with FaCC with consent, the SPO or Principal must ensure a *Consent to Share Information/Referral Form* is completed and stored securely on the student's file. If necessary, initially obtain verbal consent for the referral and then, as soon as practicable after the referral, ensure the consent form is completed and filed.

Information shared with the FaCC should include relevant information about the student and family, their identified needs and possible risks or concerns. Information may include, but is not limited to:

- the views and wishes of the family, including the student;
- the known history of the student suffering harm or being at risk of harm;
- any periods when the student has been cared for by other people;
- any significant issues relating to the student's siblings, if known;
- the student's physical health including any disability, special care needs or medical treatment/needs;
- the student's psychological and emotional health and behavioural issues;
- the student's education, including any special educational needs;
- any known allergies and dietary requirements;
- any health issues that may be impacting on the parents' functioning;
- any issues, such as mental health, substance misuse, disability or domestic and family violence, which may be impacting upon the parents' functioning; and
- any information about a person who may pose a risk to the student.

FaCC service locations and contacting FaCC

Information about the locations of FaCC across the state can be found on the FaCC website at <https://www.familychildconnect.org.au/>.

To contact FaCC you can:

- Call 13FAMILY;
- visit the local FaCC; or
- complete the online E-Referral form at <https://www.familychildconnect.org.au/>.

Intensive Family Support (IFS) Services

Intensive Family Support (IFS) services work with vulnerable families to address multiple and/or complex needs and build the family's capacity to safely care for and protect their children. The services engage with families to strengthen the protective factors within the family and to ensure children can safely live at home. The target group for IFS services are vulnerable children (unborn up to under 18 years) at risk of entry or re-entry into the statutory child protection system and their families.

Contact with, or referral to, IFS services can be made in person, by phone, by email or via the web enabled *E-Referral form* which can be accessed at <https://qld-families-referrals.infoxchangeapps.net.au/> or via the [Child Protection Guide](#).

Referral criteria for an IFS service include that:

- there must be a child to 18 or unborn child;
- there should be no current ongoing intervention by Child Safety;
- the family should be at risk of entering, or re-entering, the child protection system;
- the family would benefit from intensive support; and
- the family have multiple or complex needs.

OnePlace

The Queensland Government, through the [Queensland Family and Child Commission](#) (QFCC), has released an online Community Service Directory called [OnePlace](#). This directory has more than 46,000 records of community services across the State that can help families get the right service at the right time.

Further information about Intensive Family Support and other services

Information about the IFS services can be accessed from the Child Safety website at

<https://www.communities.qld.gov.au/gateway/reform-renewal/child-family/supporting-families-earlier>.

Information about Domestic and Family Violence Counselling Services can be accessed from the Child Safety website at

<https://www.qld.gov.au/community/getting-support-health-social-issue/counselling-support-advice/index.html>.

Information about other support services in your area can be accessed from QFCC's OnePlace website at

<https://www.oneplace.org.au/>.

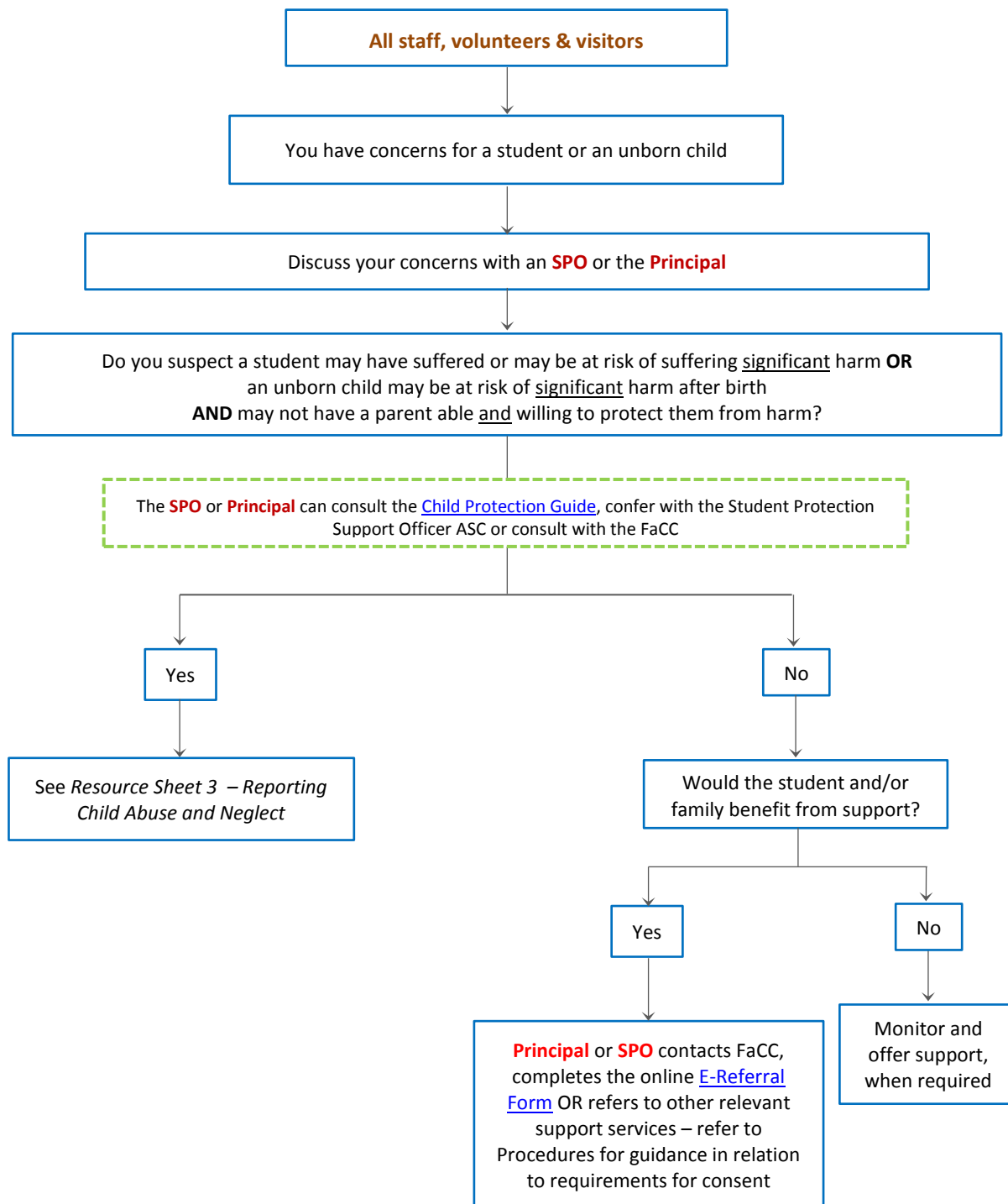
Referral forms

The following forms and templates have been provided for use when referring a student and family to a community based support service.

Form	When to use the form
E-Referral FORM Available from the FaCC website at https://familysupportreferral.org.au/	Use this form when you have concerns for a student or unborn child and family which do not meet the threshold for a report to Child Safety and you want to refer to FaCC or IFSS .
Request for Information Form	Use this form when a request is made to share information known by the school, in accordance with s.159 of the Child Protection Act 1999 .
Consent to Share Information / Referral Form	Use this form when you are gaining consent to share information about, or make a referral on behalf of, a student and family to: <ul style="list-style-type: none"> • FaCC • IFSS • a parish support service • any government or non-government support service • any professional e.g. a private psychologist This form must be completed prior to sharing any information or making a referral.

The *Request for Information Form* and *Consent to Share Information/Referral Form* are available from the ASC's ERM website or via a request to the ASC at ascstudentprotection@anglicanchurchsq.org.au.

Referral flowchart



Guidelines for dealing with a disclosure

A school staff member or volunteer may be the first person a student talks to when they are feeling unsafe. Below are some points to be aware of when a student tells you they are feeling unsafe or being abused or harmed.

<p>Do</p>	<ul style="list-style-type: none"> • listen attentively and actively; • be non-judgmental; • react calmly to the information the student provides; • only ask the student enough questions to ascertain if the concerns need to be reported; • restrict yourself to clarifying questions such as “Tell me what happened...” and/or “Tell me more about”; • reassure the student that they have done the right thing to talk to you e.g. “Thank you for telling me thisI’m glad you decided to talk to me today”; • reassure the student that they are not to blame; • provide support to the student and be aware of the privacy issues involved; and • if age appropriate, be honest with the student and talk to them about your responsibility to take action.
<p>Don’t</p>	<ul style="list-style-type: none"> • react emotionally or make accusations; • seek any more information than is absolutely necessary; • ask leading or probing questions; • put words in the student’s mouth; • make promises that you cannot keep – particularly about not telling others about the information; • leave the student alone immediately after a disclosure; and • discuss the situation with parents or anyone else (other than an Student Protection Officer (SPO) or the Principal).

General information about handling disclosures

Remember:

- it is not the role of school staff or volunteers to investigate student protection concerns;
- only ask enough questions to help you decide whether you have reasonable grounds to suspect harm or risk of harm;
- excessive questioning may cause distress and confusion and may also interfere with any subsequent investigation undertaken by Child Safety or police; and
- as soon as possible after the disclosure, make detailed notes about any signs, disclosures, injuries and behaviours that caused you to be concerned for the student’s safety or well-being. Record the actual words used by the student or adult making the disclosure and the questions you asked.

Taking photographs of injuries

- School staff and volunteers must **NOT** take photographs of any injuries to a student. If required, photographs will be taken by the police.
- A clear, detailed description of any physical injuries should be included in the relevant reporting form.

Reporting forms

Form	When to use the form
E-Report FORM Available from the Child Safety website at https://secure.communities.qld.gov.au/cbir/home/ChildSafety#	Use this form to report to Child Safety when you suspect a student may be in need of protection as a result of: <ul style="list-style-type: none"> • physical abuse • emotional/psychological abuse or • neglect You should also use this form to report when an unborn child may be in need of protection after birth.
FORM 1 Report of Suspected Sexual Abuse or Likely Sexual Abuse	Use this form to report to police and/or Child Safety when you suspect a student has been sexually abused or is likely to be sexually abused.
FORM 2 Notification of a Report to a State Authority of Suspected Child Abuse	Use this form to notify the Director of Professional Standards (DPS) [owned and controlled schools] or Chair/Director of the school's governing body, or their delegate (separately incorporated schools) that you have made a report about suspected child abuse or neglect to Child Safety or the police.
FORM 3 Report of alleged Inappropriate Behaviour Report by a staff member or volunteer	Use this form to notify the DPS (owned and controlled schools) or Chair of the school's governing body (separately incorporated schools) about suspected inappropriate behaviour by: <ul style="list-style-type: none"> • the Principal; • a staff member; or • a volunteer.
FORM 4 Record of Harm or Concerning Behaviour (Internal Use Only)	Use this form to record: <ul style="list-style-type: none"> • suspected abuse or neglect that does not meet the threshold for a report to Child Safety – once completed, store the form securely; or • information about the behaviour of a staff member or volunteer which is of concern but is not deemed to be inappropriate behaviour – once completed, store the form on the relevant staff member's file.
QCT notification Templates QCT Section 76 (Investigation) QCT Section 77 (Resignation) QCT Section 78 (Dismissal)	Use these templates to notify the Queensland College of Teachers (QCT) when the alleged inappropriate behaviour relates to a teacher registered with the QCT.
Request for Information by a Law Enforcement Agency Form	Use this form when a Law Enforcement Agency (LEA) requests information about a current/prior student AND the sharing is necessary for the prevention, detection, investigation, prosecution or punishment of a criminal offence or a breach of a law imposing a penalty or sanction (s.173(3)(e) of the Education (Accreditation of Non-State Schools) Act 2001). The LEA should retain a copy of this form for their records.
School Request for Information Student Protection Form (under the Child Protection Act 1999)	Use this form when a request is made to share information known by the school, and in accordance with s.159 of the Child Protection Act 1999 , with Child Safety, police or a prescribed entity
School Request for Interview Form	Use this form when a request is made by Child Safety or police to the school to interview a student in accordance with s.17 of the Child Protection Act 1999

Referral forms

Form	When to use the form
E-Referral FORM Available from the FaCC website at http://www.familychildconnect.org.au/profindex.asp	Use this form when you have concerns for a student or unborn child and family which do not meet the threshold for a statutory report to Child Safety and you want to refer to: <ul style="list-style-type: none"> • FaCC or • IFSS
Consent to Share Information / Referral Form	Use this form when you are going to share information about or make a referral on behalf of a student and family to: <ul style="list-style-type: none"> • FaCC • IFSS • a parish support service (non-school based ECS) • any government or non-government support service • any professional eg a private psychologist This form must be completed prior to sharing any information or making a referral.
School Request for Information (under the <i>Child Protection Act 1999</i>)	Use this form when a request is made to share information known by the school, and in accordance with s.159 of the <i>Child Protection Act 1999</i> , with a prescribed entity.

Responding to student sexualised behaviours and sexual relationships

Age appropriate sexualised behaviours

From a young age, children may exhibit sexual behaviours, both at home and at school. Such behaviours are generally healthy and age appropriate and should be responded to in a supportive way.

Knowing how to identify and respond to sexual behaviours in children and young people helps adults support children and young people's development of healthy sexuality and also helps to protect children and young people from abuse.

The [TRUE Relationships Traffic Lights® framework](#) provides guidance on sexual behaviours and can help staff decide the most appropriate response to a student's sexual behaviour.

The Traffic Lights Framework

The [Traffic Lights® framework](#), developed by TRUE Relationships (formerly Family Planning Queensland), provides a useful way for school staff to consider students' sexual behaviours.

The three categories of **green**, **orange** and **red** provide information to help staff understand and respond to these types of behaviours. Most sexual behaviours in children and young people are normal and healthy and will be in the **green** category. Concerning or harmful sexual behaviours are less common.

This framework uses the four age ranges to indicate what is age appropriate (**green**) and what is not (**orange** and **red**) including: 0 – 4 years; 5 – 9 years; 10 – 13 years; and 14 – 17 years.

Being able to identify whether behaviours are healthy, concerning or harmful is an essential part of helping children and young people. Each category requires staff to respond in different ways to provide information, support and protection.

Continuum of sexualised behaviours

The display of sexual behaviour by children and young people is usually a natural and healthy part of growing up and is one way that children and young people learn about their bodies and express their sexuality. There are a number of influences on children's sexual development and behaviour including relationships with parents, family members and peers and exposure to media, such as television, internet and magazines.

Sexual behaviours vary along a continuum of increasing complexity ranging from normal and developmentally appropriate through to developmentally inappropriate or problematic when compared with same aged peers.

Normal sexual behaviours

Sexual behaviours within the normal and developmentally appropriate range of sexual development tend to:

- be spontaneous, curious, light-hearted; and
- involve two or more children or young people who are roughly the same age, size or developmental ability voluntarily engaging in the behaviours.

Problem sexual behaviours

Problem sexual behaviours tend to:

- be excessive, secretive, compulsive, coercive, degrading or threatening;
- involve significant age, developmental, and/or power difference between the students involved;
- be persistent – do not decrease after the child is told to stop; and
- lead to a reasonable suspicion that a child has been harmed or is at risk of harm.

Assessing student sexual behaviour

When assessing behaviour, it is important to consider the situation and not the behaviour alone. There will also be individual differences between students, in their development, interests and personality.

The [Traffic Lights® framework](#) provides guidance on sexual behaviours and can help you to decide the appropriate response to a student's sexual behaviour.

Responding to student sexualised behaviours and sexual relationships

Identify (What is the behaviour - green, orange or red?)

Sexual development is influenced by many factors. The environment in which children and young people grow, develop and interact has significant influence on their knowledge, attitudes and behaviours.

When using the [Traffic Lights® framework](#) to establish whether a student's sexual behaviour is normal, concerning or harmful, it is necessary to consider the current social, cultural and familial context.

Green	Sexual behaviours that are: <ul style="list-style-type: none">• healthy, normal and age appropriate;• spontaneous, curious, mutual and light hearted; and• easily diverted experimentation.
Orange	Sexual behaviours that indicate concern as they are outside normal behaviour in terms of: <ul style="list-style-type: none">• persistence and frequency;• inequality in age, power or ability; and• an increased risk to health and safety.
Red	Sexual behaviours that indicate harm as these are behaviours which are: <ul style="list-style-type: none">• problematic or harmful;• forceful or coercive;• secretive;• compulsive; or• degrading.

Understand (What the behaviour is telling you?)

Children and young people show their needs and wants through their behaviours. Understanding the reason behind a child or young person's sexual behaviour is important.

When children or young people do not have the language, experience or ability to seek help, adults must look carefully at the behaviour.

When sexual behaviours are identified as concerning or harmful, it is essential to think about why the child or young person is exhibiting the behaviour.

Reviewing the behaviour and the way it happens will help you understand what is going on for the student and indicate what response is needed.

Respond (What you can do to address the student's needs?)

All behaviour has a function. When adults understand why the behaviour may be occurring, they can respond by helping to meet the needs of the child or young person in effective ways.

Behaviour usually reflects a range of needs. Many strategies may be required to respond to children and young people with concerning or harmful behaviours. It is also important to address the needs of the people who have an impact on the lives of children and young people, such as family, carers, teachers and support workers.

When considering possible responses to behaviours in terms of the [Traffic Lights® framework](#):

- **Red** sexual behaviours require immediate protection and follow up support;
- **Orange** sexual behaviours signal the need to monitor and provide extra support; and
- **Green** sexual behaviours provide opportunities to talk, explain and support.

The Traffic Lights® framework includes a range of print and online resources which can be obtained from TRUE Relationships at: <http://www.true.org.au/Education/traffic-lights>.

Unlawful sexual relationships

In Queensland, engaging in carnal knowledge and sexual conduct with a young person under the age of 16 years, or under the age of 18 years, if the conduct involved is sodomy, is a criminal offence irrespective of whether this contact is consensual or the persons involved are both under the age of 16. [CC 1899 ss. 208(1) and 215(1)].

Responding to student sexualised behaviours and sexual relationships

However, not all unlawful sexual relationships need to be reported to the police by school staff. For example, consensual sexual relationships between children under 16 which are considered developmentally appropriate, while unlawful, can be appropriately considered by the students' parents and a report made by them to the police, if necessary. It is important to note that both parties if consenting to unlawful sexual behaviour are alleged to be committing an offence.

If the school is approached by the police, as a consequence of a report made by a parent/s, the school will assist the police where permitted or required by law.

An unlawful sexual relationship, which would require a report to the police, involves sexual activity that:

- is apparently non-consensual and involves two young people under 16 years of age (or 18 years, in the case of sodomy); or
- involves a person under 16 years of age (or 18 years for sodomy) and the other person involved is 16 years of age and above (or 18 years for sodomy).

Responding to problem student sexual behaviours

Staff, volunteer and visitor responsibilities

When a staff member, volunteer or visitor becomes aware of a student's problem sexual behaviours, including when one student harms another student, they should:

- ensure the student/s involved are safe including intervening to reduce or prevent harm to any student;
- ensure the student/s involved are supported/supervised by a member of staff – where more than one student is involved, where possible, allocated a separate staff member to each student;
- as soon as practicable, discuss the incident or concerns with the a Student Protection Officer (SPO) or the Principal ; and
- document the incident/concerns and provide this information to the SPO or Principal.

SPO responsibilities

When an SPO becomes aware of problem sexual behaviours by a student attending the school, including when one student harms another student, they must:

- ensure the student/s involved are safe and being supported and supervised;
- determine if medical attention is required, including the administration of first aid and/or immediate contact with emergency services or mental health services; and
- inform the Principal of the incident/harm.

Principal responsibilities

When the Principal becomes aware of problem sexual behaviours by a student attending the school, including when one student harms another student, they must:

- ensure the student/s involved are safe and being supported and supervised;
- determine if medical attention is required;
- contact the student/s parents to inform them of the incident/concerns - in most cases, parents must be made aware of the incident/concern so they can take steps to ensure the student's ongoing safety, mental health and/or wellbeing;
 - The school should not inform the parents when there is a suspicion the student may have been sexually abused or may be a child in need of protection;
 - In such cases, refer to the *Student Protection in Anglican Education and Care Services Procedures* for information on reporting to Child Safety and/or police and do not contact the parent unless advised to do so;
- if appropriate and required, refer the student/s and parent/s to appropriate mental health, counselling or support services – advice and information about available services may be sought from the school Counsellor or the ASC's Student Protection Support Officer;
- in partnership with parents and any other relevant professionals, develop a plan to ensure the ongoing safety, mental health and wellbeing of each student affected by the incident/concerns;
- report concerns to Child Safety and/or police, in accordance with the *Student Protection in Anglican Education and Care Services Policy and Procedures*, when there is a suspicion the student/s may be in need of protection or may have been sexually abused or be at risk of sexual abuse;

Responding to student sexualised behaviours and sexual relationships

- document information about the management of the incident/concerns and the response to the student/s and parents including strategies to minimise the recurrence of incidents in the future;
- document any further issues in relation to the student/s' behaviour; and
- store all records securely and in accordance with records management policy and procedures.

Sexting

Staff may, on occasions, be required to respond to concerns about sexting between students or between a student and an adult.

What is 'sexting'?

Sexting is a concerning trend that involves children and young people taking sexually explicit images or videos of themselves and sending them to their friends or to other people.

Of significant concern is that once the image or video is transmitted the child or young person loses complete control. It has the potential to be easily shared with other people within the child's personal life and social community and could be severely embarrassing now and in the future.

Is sexting a crime?

It is a criminal offence to take, create, possess, send or intend to send images of a person under 18 years of age who is:

- involved in a sexual activity;
- in a sexual pose;
- acting in a sexual way; or
- exposing their genitals.

Sending images of this nature of people under 16 years is considered to be 'Child Exploitation Material'. Police will often refer to this material as CEM.

Responding to and reporting information relating to CEM

The following advice has been drawn from the *Responding to problem sexual behaviour in children and young people: Guidelines for staff in education and care settings*, produced by the South Australian Government, Catholic Education, South Australia and the Association of Independent Schools of South Australia (2013).

Sometimes serious sexual behaviour involves the use of electronic images (photographs and videos). These images may be on social network sites, mobile phones and/or digital cameras or stored on an individual or school computer or other mobile device.

The sending of nude or sexually provocative images of self or others electronically should always be taken seriously and responded to immediately.

Principal responsibilities

In all situations involving nude or sexually provocative images of children or young people or images capturing sexual assault or sexual crimes, the Principal is advised to:

- quarantine the electronic device without opening to view images (it is recognised that sometimes these or printed images will be shown to staff by students and this is unavoidable) or deleting any material;
- take whatever actions are possible to block other children or young people's access to harmful images if these are on the school's network, but 'hide' don't delete;
- quarantine the material in a secure place until it can be assessed by police who will determine its significance;
- contact police (CPIU) immediately and follow police instructions (Refer to *Resource Sheet 3D – Child Safety and police contacts*); and
- do not contact students or their parents or the particular network site until advised to do so by the police.

**REMEMBER: UNDER NO CIRCUMSTANCES ARE STAFF OR VOLUNTEERS
TO RETAIN, SHOW OR DISSEMINATE IMAGE/S OF THIS NATURE.
IN DOING SO YOU MAY BE COMMITTING A CRIMINAL OFFENCE.**