CHILD PROTECTION POLICY AND CHILD RISK MANAGEMENT STRATEGY

Version 7
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BRISBANE GIRLS GRAMMAR SCHOOL



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Introduction

This Child Protection Policy and Child Risk Management Strategy have been developed by the Board of Trustees of Brisbane Girls Grammar School (the **School**) to formalise the School's commitment to the protection of our students, to provide clarity regarding roles and responsibilities for student protection at the School, and to support decision-making that effectively responds and reports harm to students.

The Board of Trustees demands the attainment of best-practice student protection standards in every aspect of the School's activities, including those pertaining to legislative reporting requirements, and has no tolerance for breaches in child protection laws or this Child Protection Policy and Child Risk Management Strategy.

If you have any questions or concerns regarding student protection at the School, please contact the Principal by email principal@bggs.qld.edu.au or telephone (07) 3332 1300.

Overview

This Child Protection Policy and Child Risk Management Strategy sets out how the School will respond to harm (including suspected harm or allegations of harm), to students, and ensure appropriate conduct of the School's Staff and students.

This Child Protection Policy and Child Risk Management Strategy applies to all Staff, parents and students, and the School's Board of Trustees.

Before reading this document you should refer to clause 21 (Definitions) and Appendix 5: Useful definitions and key concepts.

Set out in this Child Protection Policy and Child Risk Management Strategy are policy statements, strategies developed by the School, definitions, resources and written processes to support student protection, the conduct of Staff, parents and students of the School, and particularly the reporting of harm, sexual abuse, child sexual offences, inappropriate behaviour and Reportable Conduct.

The School's Board of Trustees has approved this Child Protection Policy and Child Risk Management Strategy.

Immediate resources are available as follows:

(a) Responding to **emergencies**

Any situation in which a student is at imminent risk of harm or in immediate danger should be reported directly to the Police by dialling 000.

(b) Reporting of **harm or suspected harm**

Reports relating to harm or suspected harm (including a '**reportable suspicion**' of a teacher or registered nurse) should be made to the Principal by telephone (07) 3332 1300 or email principal@bggs.qld.edu.au, who will in turn report to the matter to Police and Child Safety Services. Alternatively a teacher or registered nurse may directly notify a 'reportable suspicion' to Child Safety Services. A teacher or registered nurse must directly notify a 'reportable suspicion' to Child Safety Services if they do not reasonably suppose the Principal has already done so.

Refer **Appendix 1: Reporting summary** and **Appendix 2A: Reporting of harm** for further specific detail on the mechanisms and processes.

(c) Reporting of **sexual abuse or likely sexual abuse** to a student under 18 years

Reports relating to sexual abuse or likely sexual abuse should be made to the Principal by telephone (07) 3332 1300 or email principal@bggs.qld.edu.au, or a member of the School's Board of Trustees by telephone (07) 3332 1300 or email BGGSChair@bggs.qld.edu.au, who will in turn report the matter to the Police.

Refer **Appendix 1: Reporting summary** and **Appendix 2B: Reporting of sexual abuse or likely sexual abuse** for further specific detail on the mechanisms and processes.

(d) Reporting of **inappropriate behaviour or a Reportable Conduct allegation** by a Staff member

A student or parent wishing to make a report relating to inappropriate behaviour or Reportable Conduct of a Staff member should contact:

- The Principal by telephone (07) 3332 1300 or email principal@bggs.qld.edu.au, or
- The Deputy Principal by telephone (07) 3332 1300 or email deputyprincipal@bggs.qld.edu.au, or
- The Dean of Students by telephone (07) 3332 1300 or email deanofstudents@bggs.qld.edu.au, or
- The Head of Junior School by telephone (07) 2100 7100 or email headofjuniorschool@bggs.qld.edu.au, or
- The relevant Head of House by telephone (07) 3332 1300 or email studentreception@bggs.qld.edu.au.

A staff member who receives a report of inappropriate behaviour or alleged Reportable Conduct must report it to:

- The Principal by telephone (07) 3332 1300 or email principal@bggs.qld.edu.au, or
- The Deputy Principal by telephone (07) 3332 1300 or email deputyprincipal@bggs.qld.edu.au, or
- The Dean of Students by telephone (07) 3332 1300 or email deanofstudents@bggs.qld.edu.au, or
- The Queensland Family and Child Commission (QFSS) https://www.qfcc.qld.gov.au/report-concern

Refer **Appendix 1: Reporting summary** and **Appendix 2C: Reporting of inappropriate behaviour** for further specific detail on the mechanisms and processes.

(e) Reporting of a **child sexual offence**

Reports relating to a child sexual offence or reasonable suspicion of a child sexual offence should be made to:

- The Principal by telephone (07) 3332 1300 or email principal@bggs.qld.edu.au, or
- The Deputy Principal by telephone (07) 3332 1300 or email deputyprincipal@bggs.qld.edu.au, or
- The Head of Junior School by telephone (07) 2100 7100 or email headofjuniorschool@bggs.qld.edu.au, or
- The Dean of Students by telephone (07) 3332 1300 or email deanofstudents@bggs.qld.edu.au

who will in turn report the matter to the Police. Reports may also be made directly to Police. Refer **Appendix 1: Reporting summary** and

Appendix 2D: Reporting of child sexual offence for further specific detail on the mechanisms and processes.

Child Protection Policy

1 Purpose

The purpose of this Child Protection Policy (**Policy**), and its associated Child Risk Management Strategy (**Strategy**) (including appendices), is to provide written processes that accord with best practice and comply with legislation about:

(a) how Brisbane Girls Grammar School (the **School**) will respond to harm (including suspected harm or allegations of harm) to students, and

(b) the appropriate conduct of the School's Staff and students.

These written processes include:

(a) a process for reporting inappropriate behaviour or a Reportable Conduct allegation by a Staff member under the *Child Safe Organisations Act 2024* (Qld) (**CSO Act**) and how such reports are to be dealt with

(b) a process for reporting harm or suspected harm and how such reports are to be dealt with

(c) a process for reporting actual, suspected or likely sexual abuse in accordance with sections 366 and 366A of the *Education (General Provisions) Act 2006* (Qld) (**EGP Act**)

(d) a process for mandatory reporting of a "reportable suspicion" under sections 13E and 13G of the *Child Protection Act 1999* (Qld) (**CP Act**), and

(e) a process for reporting child sexual offences under section 229BC of the *Criminal Code Act 1899* (Qld) (**Criminal Code**).

While not all legislative mandatory reporting obligations apply to students 18 years and over (and under the Criminal Code do not apply to most students 16 years and over), the School is committed to the protection of all students, and therefore requires Staff, students and parents to internally report all matters that may impact the safety of a student or students of the School.

2 Scope

This Policy applies to all students, parents and staff (including full-time, part-time, permanent, fixed-term and casual employees as well as contractors, volunteers and people undertaking work experience or vocational placements at the School) (**Staff**), and members of the Board of Trustees of Brisbane Girls Grammar School (the **Board**). Visitors to the School will also be made aware of this Policy and encouraged to report any concerns to the School.

3 Policy statement

The Board is committed to the safety and wellbeing of all students enrolled at the School, and to providing a safe and healthy environment to all students under the School's care.

The welfare and best interests of the students are paramount, and protecting students from harm and the risk of harm is fundamental to the ethos of the School.

4 Roles and responsibilities

4.1 Board of Trustees

The Board retains ultimate responsibility for student protection within the School, and has the responsibility for the regular review and monitoring of this Policy to ensure compliance with legislation and best practice.

The Board will receive, consider and action (as appropriate) student protection reporting from the Principal and other Staff.

4.2 Principal

The Principal is responsible for ensuring all Staff are regularly trained in the application of this Policy and for maintaining a culture of constant vigilance and awareness of this Policy throughout the School. The Principal will also receive, consider and action (as appropriate) student protection reporting from students, parents and other Staff.

4.3 Deputy Principal, Dean of Students, Heads of House and Head of Junior School

The Deputy Principal, Dean of Students, Heads of House and Head of Junior School will receive, consider and action (as appropriate) student protection reporting from students, parents and other Staff.

5 Responding to reports of harm

When the School receives any information alleging harm to a student, it will meet its reporting obligations and deal with the situation compassionately and fairly so as to minimise any likely harm to the extent it reasonably can.

In dealing with matters arising under this Policy:

(a) The School will not tolerate conduct which exposes students to harm and is committed to the rights of children and young people to feel safe and be safe when participating in the School's activities.

(b) The School will provide support for all parties involved in a matter being dealt with under this Policy, including students, parents and Staff as applicable. Such support might include professional counselling (either internal or external).

(c) The School will not permit a Staff member to continue to work in a position if based on the information available there is an unacceptable risk of harm to a student.

(d) The School will cooperate with external authorities as appropriate, including the Police, Child Safety Services, and Queensland Family and Child Commission.

(e) The School will inform parents as soon as practicable of matters involving their child, unless circumstances suggest it would not be in the student's interests to do so.

(f) The School will ensure that those making decisions are not biased, and that any Staff members against whom allegations are made are informed of the allegations and that no adverse action is taken against a person unless the person is given prior notice of the allegations against them and they have a fair opportunity to respond. However, the School may suspend a Staff member from their duties pending an investigation of allegations.

(g) The School will ensure there are at least two representatives of the School present at any interviews with a student, where and that the student is supported by a parent or School counsellor as appropriate and practicable in the circumstances of the case. At School counselling appointments, where information related to harm may arise, there may not be two representatives of the School present.

(h) The School will observe appropriate confidentiality. The School is unable to guarantee absolute confidentiality since applicable legislation and its policies will require disclosing, internally and externally, certain details involved in responding to complaints.

(i) The School will keep a permanent confidential record of what has occurred, including in individual student files, Staff files and centrally, as appropriate. The School's *Privacy Policy* and *Standard Collection Notice* set out how the School manages personal information provided to or collected by it that is covered by the *Privacy Act 1988* (Cth).

(j) The School will promote and respect the rights of its students to be heard, protected and supported, and the rights of students and their families to have their concerns resolved.

Following any report of harm the Principal will work with the School's student wellbeing team and/or external professionals (as appropriate) to ensure, to the extent possible, the safety of the student, and to provide support to the student and parent/s.

The School will comply with its obligations under the CSO Act by ensuring that the reportable allegations and reportable convictions involving Staff are reported internally as soon as practicable, notified to the Queensland Family and Child Commission within statutory timeframes, and appropriately investigated and reported as required under the CSO Act.

Certain matters involving teachers may be reportable to the Queensland College of Teachers including those detailed in **Appendix 2: Reporting procedures**.

As the School is a statutory body, it may in some cases be necessary for the School to also advise the Crime and Corruption Commission of matters dealt with under this Policy. The obligation to do so will be assessed by the School on a case by case basis.

The School will also comply with all reporting and notification requirements arising under blue card legislation.

6 Conduct of Staff and students

All Staff must ensure that their behaviour towards and relationships with students reflect the highest standards of care for students, and are not unlawful. Staff must not cause harm to students. In particular, Staff must not under any circumstances engage in physical or emotional abuse or sexual conduct of any nature with a student of the School. It is irrelevant whether the conduct is consensual or non-consensual, or condoned by parents or caregivers. The age of a student is also irrelevant.

Failure of Staff to behave in an appropriate manner towards students may result in criminal proceedings and/or disciplinary action, including dismissal.

All Staff, students and parents must comply with this Policy, including the reporting obligations summarised in **Appendix 1: Reporting summary** and detailed in **Appendix 2: Reporting procedures**.

An Internal Reporting Harm Template, for use by Staff when reporting harm, a reportable suspicion, sexual abuse, child sexual offences, inappropriate behaviour or a Reportable Conduct allegation internally (such as to the Principal or a member of the Board), is set out in **Annexure 3: Internal Reporting Harm Template**. An External Reporting Harm Template is set out in **Annexure 4: External Reporting Harm Template**.

Staff, students and parents should be aware that:

(a) The role of a person reporting a matter under this Policy is not an investigative one. Individuals must not undertake investigations beyond satisfying themselves that they have reasonable grounds to suspect harm, a risk of harm or inappropriate behaviour (or that they have reasonable grounds for believing that a child sexual offence is being or has been committed).

(b) Once a report has been made in accordance with the reporting obligations summarised in **Appendix 1: Reporting summary** and detailed in **Appendix 2: Reporting procedures**, a Staff member is not required to take further action, beyond continuing to exercise a duty of care and cooperating with any further investigation that is conducted by the School or by external authorities.

(c) Staff members are encouraged to confer with the Principal, Deputy Principal or Head of Junior School if unsure whether a matter should be reported under this Policy.

(d) Relevant legislation provides for protections from liability for persons who, acting honestly and reasonably, notify or give information about suspected harm to Child Safety Services or the Police.

(e) Child Safety Services operates under strict laws of confidentiality. This means Child Safety Services does not divulge:

- the identity of the person reporting the matter, except to others requiring the information to perform duties under the CP Act, nor
- information about an investigation to the person reporting the matter.

(f) In accordance with the CP Act, Criminal Code and the EGP Act there are **mandatory** reporting obligations placed on certain people. Mandatory reporters under the CP Act include registered nurses and teachers (refer **Appendix 5: Useful definitions and key concepts**). All adults have mandatory reporting obligations under the Criminal Code and all Staff have mandatory reporting obligations under the EGP Act and CSO Act. Staff **must** be aware of and comply with their mandatory reporting obligations (refer to **Appendix 1: Reporting summary** and **Appendix 2: Reporting procedures**).

(g) Reprisals against those who make a report under this Policy will not be tolerated by the School. No person may retaliate or victimise against a person acting reasonably and honestly who provides information under this Policy to a person who needs to know that information.

(h) A person acting reasonably and honestly providing information to a person who needs to know that information is generally excused from liability for defamation.

7 Reporting inappropriate behaviour

If a student, parent or Staff member considers the behaviour of a Staff member to be inappropriate, they must report the behaviour as soon as possible in accordance with the processes summarised in **Appendix 1: Reporting summary** and detailed in **Appendix 2: Reporting procedures**.

A Staff member who receives a report of inappropriate behaviour must report it to the Principal (or, where the Principal is the subject of the report of inappropriate behaviour, a member of the Board) in accordance with the processes summarised in **Appendix 1: Reporting summary** and detailed in **Appendix 2: Reporting procedures**.

Under the CSO Act, if a Staff member becomes aware of a reportable allegation or a reportable conviction involving another Staff member then they must , as soon as is practicable, report the matter to the Principal or, if the matter relates to the Principal, report the matter to Queensland Family and Child Commission.

8 Reporting harm or suspected harm

All staff are required to report harm or suspected harm to a student in accordance with the processes detailed in **Appendix 2: Reporting procedures**.

9 Reporting sexual abuse or likely sexual abuse[1]

Sections 366 and 366A of the EGP Act relevantly state that if a Staff member becomes aware, or reasonably suspects, in the course of their employment at the School, that any of the following has been or is likely to be sexually abused by another person:

- a student under 18 years attending the School
- a kindergarten age child registered in a kindergarten learning program at the School
- a person with a disability who, under section 420(2) of the EGP Act, is being provided with special education at the School and is not enrolled in the preparatory year at the School,

[1] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)(c)*

then the Staff member must give a written report about the abuse, suspected abuse or likely abuse to the Principal or to a member of the Board **immediately**. The Principal or member of the School's Board must then **immediately** give a copy of the Staff member's report to Police.

If the Staff member who becomes aware of or reasonably suspects sexual abuse or likely sexual abuse is the School's Principal, the Principal must give a written report about the abuse, or suspected abuse to a police officer **immediately** and must also **immediately** give a copy of the report to a member of the Board.

A report under this section must include the following particulars:

(a) the name of the person giving the report (the **first person**)

(b) the student's name and sex

(c) 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

(d) in the case of actual or suspected abuse, details of the abuse or suspected abuse, and

(e) any of the following information of which the first person is aware:

- the student's age
- the identity of the person who has abused, or is suspected to have abused, or be likely to abuse, the student, and
- the identity of anyone else who may have information about the abuse or suspected abuse or likelihood of abuse[2].

The report templates in **Annexure 3: Internal Reporting Harm Template** and **Annexure 4: External Reporting Harm Template** are designed to address these matters.

Further details and indicators of sexual abuse, including 'grooming' behaviour can be found in **Appendix 5: Useful definitions and key concepts**.

10 Reporting physical and sexual abuse[3]

Under Section 13E(3) of the CP Act, if a 'relevant person' (in this context a relevant person includes registered nurses and teachers, also referred to as 'mandatory reporters') (refer **Appendix 5: Useful definitions and key concepts**) forms a 'reportable suspicion' about a child in the course of their engagement in their profession, they must make a written report to Child Safety Services, and provide a copy of such report to the Principal. However, they are not required to do so if they are aware or reasonably suppose that the matter has already been reported to Child Safety Services (such as by the Principal).

A **reportable suspicion** about a child is a reasonable suspicion that the child:

(a) has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse, and

(b) may not have a parent able and willing to protect the child from the harm.

A report under this section must:

(a) state the basis on which the person has formed the reportable suspicion, and

(b) include the following information prescribed by regulation, to the extent of the person's knowledge:[4]

- the child's name, age and sex descriptor

[2] *Education (General Provisions) Regulation 2017* (Qld) s.69
[3] *Education (Accreditation of Non-State Schools) Regulation 2017* (Qld) s.16(2)(d)
[4] See *Child Protection Regulation 2023* (Qld) s.4 'Information to be included in reports'

- details of how to contact the child (for example, the address at which the child usually lives or the name and address of the school the child attends)
- 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, or suffer or be at risk of suffering, the harm to which the reportable suspicion relates, and
- particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates.

During business hours (Monday to Friday, 9am to 5pm) Child Safety Regional Intake Services Brisbane area can be contacted on 1300 682 254. Outside of business hours, Child Safety After Hours Service Centre can be contacted on 1800 177 135 (Queensland only).

The report templates in **Annexure 3: Internal Reporting Harm Template** and **Annexure 4: External Reporting Harm Template** are designed to address these matters.

A teacher or registered nurse may confer with a colleague and share information for particular purposes, including for the purposes of forming a reportable suspicion, making a report and keeping a record of it, and for the Principal to take appropriate action to deal with the suspected harm or risk of harm.[5]

11 Reporting child sexual offences

Section 229BC of the Criminal Code requires **all** adults (whether they are Staff members, parents or students 18 years and over) to report information relating to child sexual offences where:

(a) The adult gains information that causes them to believe on reasonable grounds, or ought reasonably to cause them to believe, that a child sexual offence is being or has been committed against a child by another adult, and

(b) At the time the adult believes (or ought reasonably to believe) the child sexual offence was committed, the child was under 16 years (or was aged between 16 years and 18 years and had an impairment of the mind).

There may be cases where information is not reportable under the CP Act and/or EGP Act, but must be reported under the Criminal Code.

Important note: In addition to the above, under section 229BB of the Criminal Code, adults who are 'accountable persons' (including, but not limited to, members of the Board and Staff) will commit an offence if:

(a) The adult knows there is a significant risk that another adult (the alleged offender) will commit a child sexual offence in relation to a child who is under the care, supervision or control of the School

(b) The alleged offender is associated with the School (or another institution) or is a regulated volunteer

(c) The child is under 18 years or is a person with an impairment of the mind

(d) The adult has the power or responsibility to reduce or remove the risk, and

(e) The adult wilfully or negligently fails to reduce or remove the risk.

Such persons, including members of the Board and Staff, must therefore ensure they take all steps within their power or responsibility to reduce or remove any such risks.

[5] *Child Protection Act 1999 (Qld)* s.13H.

12 Self-harm

During their schooling, some students may be at risk of harming themselves. This harm may occur with or without suicidal intent; or may be symptomatic of, or associated with, a known medical condition or intellectual disability. In a case where self-harm occurs or is reasonably suspected of occurring or likely to occur, in a context of parents not acting protectively, it may be necessary to report the harm externally in accordance with this Policy (refer to the reporting obligations in **Appendix 1: Reporting summary** and **Appendix 2: Reporting procedures**).

In the case of an acutely distressed student, the immediate safety of the student is paramount. Staff members must (in order):

(a) ensure the immediate safety of the student

(b) arrange for an adult to be with the student at all times,

(c) consider whether any other student requires support, and

(d) report as required under this Policy.

While it is important to provide support to a student, Staff members must be careful not to substitute support for professional help.

Not all cases of self-harm relate to suicidal intent. Students may engage in a variety of high risk behaviours, such as: alcohol/substance abuse; drug-taking; unsafe promiscuity; or cutting/burning oneself. The School provides a range of educational programmes to assist students to make appropriate choices in relation to drug and alcohol use and sexual activity.

Further details of risk factors for self-harm can be found in **Appendix 5: Useful definitions and key concepts**.

13 Bullying, discrimination and sexual harassment

The School has policies dealing with bullying, discrimination and sexual harassment. These are:

(a) *Promoting Positive Relationships Policy*

(b) *Anti-Discrimination Policy*, and

(c) *Sexual Harassment-Free Workplace Policy*.

The School recognises that bullying, discrimination and sexual harassment may amount to harm to a student. If any type of harm is reasonably suspected it must be managed and reported without exception in accordance with this Policy, including the reporting obligations detailed in **Appendix 2: Reporting procedures**.

14 Awareness and training

The Board is responsible for ensuring Staff, students and parents are informed of the School's processes under this Policy in communications to them[6].

To facilitate this, the Principal and Senior Leadership Team will ensure that the School:

(a) publishes this Policy so that it is available to Staff, students and parents on the School's Learning Management System (Minerva), as well as published on the School's website for visitors

(b) informs parents about the Policy as part of their induction to the School and the parent portal on Minerva

[6] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(a)*

(c) informs students about the Policy during House Group meetings and/or in Year Assemblies at least once each year and educates student about child protection

(d) ensures Staff receive a copy of, and are trained in the processes under, this Policy on their induction, and refresh training annually (with appropriate records maintained of such training) [7]

(e) provides updates at Staff meetings about this Policy (including any changes to this Policy), and discussions about the Policy between managers and their Staff

(f) regularly refers to this Policy in the School newsletter.

15 Health and safety

The School has written processes in place about the health and safety of its Staff and students in accordance with relevant workplace health and safety legislation[8]. Refer to the School's *Work Health and Safety Policy and Procedures*.

16 Implementing this Policy

The School will ensure it is implementing its processes under this Policy by auditing compliance with the processes at least annually[9].

In order to reduce the risk of any harm occurring, the School will also implement the *Child Risk Management Strategy* annexed to this Policy.

17 Insurer

The School will keep its insurer informed about the circumstances which may give rise to a claim under the School's insurance policies. All Staff have an obligation to inform the Principal or the Secretary to the Board of any circumstances of which they become aware which may give rise to a claim against the School.

18 Accessibility of processes

Processes relating to the health, safety and conduct of Staff and students are accessible on the School website as well as on the School's Learning Management System (Minerva)[10].

19 Breach of this Policy

The School will take appropriate action against any person who breaches this Policy. The appropriate action taken is a matter to be determined by the Principal on a case by case basis, in consultation with the Board and after taking legal and other expert advice if necessary.

Without limiting the foregoing, failure by any Staff member to comply with their reporting obligations constitutes serious misconduct and will lead to disciplinary action by the School, which may include termination. A Staff member may also face other legal consequences (including criminal liability) if the Staff member has breached their legislative reporting obligations.

Once a matter has been reported to external authorities, the School will cooperate with those authorities. However, the School is not always required to await the outcome of any external processes before taking any internal disciplinary or other action.

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[7] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(c)*
[8] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.15*
[9] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(d)*
[10] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(b)*

20 Complaints procedure

Suggestions of non-compliance with the School's processes under this Policy may be submitted (and will, where appropriate, be dealt with) as complaints under the School's *Complaints Handling Policy* or grievances under the *Employee Grievance Resolution Policy*.[11]

21 Definitions

In this Policy:

(a) **child** means an individual under 18 years.

(b) **child in need of protection** means a child who:

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

(c) **Child Safety Services** means the Queensland Government agency for child protection services that is responsible (through the Department of Families, Seniors, Disability Services and Child Safety) for administering the CP Act.

(d) **harm**, to a child, means any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing, irrespective of cause. Causes of harm may include, but are not limited to, physical, psychological or emotional abuse or neglect, or sexual abuse or exploitation. Harm may be caused by a single act, omission or circumstance, or by a series or combination of acts, omissions or circumstances. (See also Appendix 5.)

(e) **parent** includes a legal guardian.

(f) **Police** means the Queensland Police Service.

(g) **sexual abuse**, in relation to a student under 18 years, includes sexual behaviour involving the student and another person in the following circumstances:

- the other 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. (See also Appendix 5.)

(h) **registered nurse** has the meaning given to that term in the CP Act.

(i) **Reportable Conduct** includes any conduct engaged in by a Staff member towards any child or young person that is reportable under the Reportable Conduct Scheme. Reportable Conduct may arise at any time from a single incident or a pattern of behaviour and may occur in person, online, or through the use of technology. Reportable Conduct categories are:

- a child sexual offence
- sexual misconduct committed in relation to, or in the presence of, a child
- ill-treatment of a child
- significant neglect of a child
- physical violence committed in relation to, or in the presence of, a child

[11] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(5) and s.16(6)*

- behaviour that causes significant emotional or psychological harm to a child.

(j) **student** means an individual enrolled as a student at the School, regardless of age.

(k) **teacher** means an approved teacher under the *Education (Queensland College of Teachers) Act 2005* (Qld).

Unless the context requires otherwise, other words and phrases in this Policy have the meaning given in **Appendix 5: Useful definitions and key concepts**.

22 Review

This Policy shall be reviewed annually or in the event of any information, incident, legislative changes or changes to organisational practice that would demonstrate the need for earlier review.

Any questions or feedback on this Policy should be directed to the Deputy Principal.

Child Risk Management Strategy

1 Purpose

Brisbane Girls Grammar School (the **School**) is dedicated to eliminating and minimising risks to child safety, and to implementing employment practices and procedures to promote the safety and wellbeing of all students at the School and to protect students from harm.

2 Scope

This Child Risk Management Strategy (**Strategy**) applies to all students, parents and staff (including full-time, part-time, permanent, fixed-term and casual employees as well as contractors, volunteers, professional service providers and people undertaking work experience or vocational placements at the School) (**Staff**), and the Board of Trustees of Brisbane Girls Grammar School (the **Board**).

3 Statement of commitment

The School is committed to the safety and wellbeing of students in the School's care and their protection from harm[12]. In practice, the School is committed to implementing the *Child Protection Policy*, acting in accordance with the *Working with Children Check Act 2000* (Qld) (**Working with Children Act**) and promoting the safety and wellbeing of students by implementing the measures outlined in this Strategy.

4 Code of conduct

Staff are expected to always behave in ways that promote the safety, welfare and well-being of children and young people. They must actively seek to prevent harm to children and young people, and to support those who have been harmed.

This Strategy, the School's *Child Protection Policy, Child Safety and Wellbeing Policy, Staff Code of Conduct*, *Protective Practices Policy* and *Code of Ethics*, outline clear standards of conduct that Staff must follow in the areas of teaching and learning, the curriculum, student wellbeing, personal conduct, attending School events, and the relationships one has with students, parents, colleagues and the School.

This commitment is evidence of the School's fulfilment of the requirements of schedule 1, section 2(2) of the *Working with Children (Risk Management and Screening) Regulation 2020* (Qld) (**Working with Children Regulation**).

5 Recruitment, selection, training and management procedures

The School is committed to recruiting, selecting, training and managing Staff in such a way that limits risks to students. In particular, the School will:

(a) ensure that its recruitment and selection procedures (refer to the *Recruitment and Selection Policy* and *Staff References Policy*) act to reduce the risk of harm to students from Staff via:

- accurate position descriptions, including whether the successful applicant must be a teacher registered with the Queensland College of Teachers (who has been subject to relevant police and other safety checks), whether a Blue Card (Working with Children Check) is necessary for the successful applicant, the responsibilities and supervision associated with the position, that the position involves responsibility for student safety, the nature and environment of the services provided to children, and the experience and qualifications required by the successful applicant

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

- advertising positions with a clear statement in the position description about the School's commitment to child safety, child protection and identifying that candidates will be subject to a teacher registration check or blue card screening, a police check, referee checks, identification verification and the requirement to disclose any information relevant to the candidates' eligibility to engage in activities including children and young people
- a selection process that includes assessing the application via an interview process and referee and other checks (as identified above) based on the accurate position description, including asking questions of the applicant and referees regarding the applicant's values and attitudes concerning relationships with children and young people and understanding of sexual (and other) abuse, its causes and prevention
- at least two reference checks for all new full-time and part-time Staff, including the candidate's most recent manager and/or Principal. The School reserves the right to contact persons other than those nominated as referees by the candidate
- at least one reference check for all casual Staff. The School reserves the right to contact persons other than those nominated as referees by the candidate, and
- a probationary period of employment, which allows the School to further assess the suitability of the new Staff member and to act as a check on the selection process, and

(b) ensure that its training and management procedures act to reduce the risk of harm to children and young people from Staff via:

- management processes that are consistent, fair and supportive
- performance management processes to help Staff to improve their performance in a positive manner
- supportive processes for Staff when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training, and external support and counselling services
- an induction program which addresses the School's policies and procedures, particularly its expectations regarding student protection and risk management and to assist Staff to understand their role in providing a safe and supportive environment for children and young people
- training new and existing Staff on an ongoing basis to enhance skills and knowledge and to reduce exposure to risks, in relation to matters including:
    - the School's policies and procedures
    - identifying, assessing and minimising risks to children and young people, and
    - handling a disclosure or suspicion of harm
- keeping a record of the training provided to Staff
- exit interviews to assist the School to identify broader issues of concern that may impact on the safety and wellbeing of children and young people at the School, and
- provision of references for former Staff in accordance with the School's *Staff References Policy*. Appropriate information about any relevant child safety concerns should be made available to anyone genuinely considering a former Staff member for other child related employment.

For certain Staff who are not employees (e.g. ad hoc contractors or volunteers) the recruitment, selection and training procedures may differ from the above. However, the School will in all cases ensure that it takes appropriate steps to limit risks to children and young people.

This commitment is evidence of the School's fulfilment of the requirements of schedule 1, section 2(3) of the Working with Children Regulation.

6 Handling disclosures or suspicions of harm

The School's *Child Protection Policy*, *Child Safety and Wellbeing Policy* and *Complaints Policy* set out procedures for handling disclosures or suspicions of (among other things) harm or suspected harm, inappropriate behaviour, or alleged Reportable Conduct by a Staff member, including reporting guidelines. Such policies and procedures apply to all Staff, parents and students. All Staff, parents and students have access to the *Child Protection Policy*, *Child Safety and Wellbeing Policy* and *Complaints Policy* and receive information, education and/or training about their responsibilities under it.

Furthermore, the *Child Protection Policy*, *Child Safety and Wellbeing Policy* and *Complaints Policy* set out procedures for the Principal of the School to report to the Queensland Family and Child Commission and the Queensland College of Teachers the School's dealings in relation to any allegations of Reportable Conduct or harm caused, or likely to be caused, to a child because of the conduct of a relevant Staff member at the School.

This commitment is evidence of the School's fulfilment of the requirements of schedule 1, section 2(4) of the Working with Children Regulation.

7 Managing breaches of this Strategy

The School is committed to appropriately managing breaches of this Strategy in accordance with its other relevant policies as appropriate in the circumstances, such as the *Child Protection Policy*, *Staff Code of Conduct*, *Employee Grievance Resolution Policy* and *Complaints Handling Policy*, and this is evidence of fulfilment of the requirements of schedule 1, section 2(5) of the Working with Children Regulation. The School will promptly record, monitor and report to the Board regarding any breaches of this Strategy.

8 Implementing and reviewing this Strategy

'Responsibilities' for implementing this Strategy are set out at section 13 below.

The 'Compliance and monitoring' section below states the School's commitment to reviewing this Strategy annually.

This is evidence of the School's fulfilment of the requirements of schedule 1, section 2(6)(a) of the Working with Children Regulation relating to implementation.

9 Blue Card (Working with Children Check) policies and procedures

The School is committed to acting in accordance with the Working with Children Act relating to the screening of employees in such a way that limits risks to children, including through its *Blue Card Policy*. In particular, the School will:

(a) Comply with all of the requirements of the Working with Children Act and Working with Children Regulation

(b) Appoint a School contact person(s) who will be responsible for managing the screening process and all related documentation and records required under the Working with Children Act and Working with Children Regulation

(c) Meet all reporting and notification requirements arising under the Working with Children Act and Working with Children Regulation,

(d) Act to monitor the dates of expiry of blue cards and exemption cards and remind Staff to keep their blue card or exemption card up to date, and

(e) Keep a written record about all relevant actions, decisions and outcomes relating to matters under the Working with Children Act and Working with Children Regulation, including (where relevant) the matters above, via the School's Blue Card Register.

This is evidence of the School's fulfilment of the requirements of schedule 1, section 2(6)(b) of the Working with Children Regulation.

10 High risk management plans

The School is committed to identifying, assessing, controlling and monitoring risks to the health and safety of students on an ongoing basis, including in relation to high risk activities (such as outdoor education, tours and sports) and special events. The School's Enterprise Risk Management Strategy Framework (among other documents) require School Staff to plan for the management of such risks. This is evidence of fulfilment of the requirements of schedule 1, section 2(7) of the Working with Children Regulation.

11 Student wellbeing

The School's wellbeing program takes an active role in supporting the health and wellbeing of all students. The program incorporates a carefully considered structure including Heads of House, House Group Teachers, Classroom Teachers and Year Level Advisors (Years 5 and 6), together with health professionals including the School Nurses and student counselling services. Also included in the program is the education of all students on child protection matters.

The student counselling service is available to all students, providing counselling and confidential support.

12 Strategies of communication and support

The School makes this Strategy available to students, parents and Staff including via its Learning Management System (Minerva) and the School's website as part of its *Child Protection Policy*. This is evidence of fulfilment of the requirements of schedule 1, section 2(8)(a) of the Working with Children Regulation.

The School is committed to training Staff in relation to identifying risks of harm to children and young people, handling disclosures or suspicions of harm to children and young people (including reporting obligations under the *Child Protection Policy*), and the content of this Strategy. The School conducts this training regularly via (as applicable) induction, annual formal training events, updates at Staff meetings and discussions between managers and their Staff. This is evidence of fulfilment of the requirements of schedule 1, section 2(8)(b)) of the Working with Children Regulation.

13 Responsibilities

The School's Board is responsible for developing and implementing this Strategy and related School policies to ensure it fulfils its legal obligations.

All Staff are responsible for acting in compliance with this Strategy and related School policies and procedures.

14 Compliance and monitoring

The School will review this Strategy at least annually (or more frequently if required) to respond to legislative or operational changes, incident outcomes and other relevant matters. The School will also record, monitor and report to the Board regarding any breaches of this Strategy.

In addition, the School is committed to other various compliance and monitoring arrangements made under related policies and procedures.

15 Related documents

15.1 Legislation

Child Protection Act 1999 (Qld)

Child Protection Regulation 2023 (Qld)

Crime and Corruption Act 2001 (Qld)

Criminal Code Act 1899 (Qld)

Child Safe Organisations Act 2024 (Qld)

Domestic and Family Violence Protection Act 2012 (Qld)

Education (General Provisions) Act 2006 (Qld)

Education (General Provisions) Regulation 2017 (Qld)

Education (Accreditation of Non-State Schools) Act 2017 (Qld)

Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)

Education (Queensland College of Teachers) Act 2005 (Qld)

Working with Children Check Act 2000 (Qld)

Working with Children (Risk Management and Screening) Regulation 2020 (Qld)

15.2 School policies and procedures

Anti-Discrimination Policy

Blue Card Policy and Register

Child Protection Policy

Child Safety and Wellbeing Policy

Staff Code of Conduct

Complaints Handling Policy

Employee Grievance Resolution Policy

Privacy Policy and Standard Collection Notice

Promoting Positive Relationships Policy

Protective Practices for Staff Policy

Recruitment and Selection Policy

Risk Management Strategy Framework

Sexual Harassment-Free Workplace Policy

Staff References Policy

Work Health and Safety Policy and Procedures

15.3 Independent Schools Queensland resources

Decision Tree – Principal and Trustee

Decision Tree – Teacher

Decision Tree – Non-teaching Staff

Decision Tree – Volunteer

Appendix 1: Reporting summary

(adapted from ISQ School Services)

***IMPORTANT NOTE*: A single matter may be subject to more than one reporting obligation; you should consider each obligation in this Appendix 1 and whether it applies in the circumstances. Refer to Appendix 2 for further details.**

Who	What	Test	Report to
All Staff including teachers and registered nurses	Sexual abuse	Awareness or a reasonable suspicion Sexually abused or likely to be sexually abused	**Immediately** to Principal (or, if Principal the first person to become aware, to a member of Board), through to Police[13] Principal: Tel (07) 3332 1300 principal@bggs.qld.edu.au Board: Tel (07) 3332 1300 BGGSChair@bggs.qld.edu.au Police: Tel (07) 3364 6464
	Inappropriate behaviour, orbehaviour that may constitute Reportable Conduct of a Staff member	Behaviour of another Staff member is inappropriate	Principal (or, if Principal involved in inappropriate behaviour, a member of the Board or direct to QFCC: Principal: Tel (07) 3332 1300 principal@bggs.qld.edu.au Board: Tel (07) 3332 1300 BGGSChair@bggs.qld.edu.au QFCC: https://www.qfcc.qld.gov.au/report-concern
Staff who are **teachers or registered nurses**	Reportable suspicion	Reasonable suspicion a child has suffered, is suffering, or is at unacceptable risk of suffering significant harm caused by sexual or physical abuse, and Parent may not be willing and able to protect the child	Principal immediately, through to Child Safety Services[14] or directly to Child Safety Services or the Police Principal: Tel (07) 3332 1300 principal@bggs.qld.edu.au Child Safety Services: Tel 1300 682 254 Police: Tel (07) 3364 6464

[13] *Education (General Provisions) Act 2006* (Qld), sections 366 and 366A
[14] *Child Protection Act 1999* (Qld), sections 13E, 13G and 13H

Who	What	Test	Report to
	Harm	Concern about harm to a child that does not reach the level of reporting to Child Safety Services, but child is likely to become a child in need of protection if no preventative support is given	Principal, through to Child Safety Services[15] or directly to Child Safety Services Principal: Tel (07) 3332 1300 principal@bggs.qld.edu.au Child Safety Services: Tel 1300 682 254
Staff **other than** teachers or registered nurses	Harm	Aware or reasonably suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering harm	Principal: Tel (07) 3332 1300 principal@bggs.qld.edu.au Deputy Principal: Tel (07) 3332 1300 deputyprincipal@bggs.qld.edu.au Dean of Students: Tel (07) 3332 1330 deanofstudents@bggs.qld.edu.au Head of Junior School: Tel (07) 2100 7100 headofjuniorschool@bggs.qld.edu.au Head of House: Tel (07) 3332 1330 studentreception@bggs.qld.edu.au
Any adult (whether Staff, parent or student 18 years or over)	Child sexual offence against a child by another adult	Information causes adult to believe on reasonable grounds, or ought reasonably to cause the adult to believe, that a child sexual offence is being or has been committed and, at the relevant time, the child is or was: • under 16 years, or • 16 or 17 years with an impairment of the mind	Principal immediately or Deputy Principal, through to Police[16] or directly to Police Principal: Tel (07) 3332 1300 principal@bggs.qld.edu.au Deputy Principal: Tel (07) 3332 1300 deputyprincipal@bggs.qld.edu.au Head of Junior School: Tel (07) 2100 7100 headofjuniorschool@bggs.qld.edu.au Police: Tel (07) 3364 6464

[15] *Child Protection Act 1999* (Qld), sections 13E, 13G and 13H

[16] *Criminal Code Act 1899* (Qld), section 229BC

Who	What	Test	Report to
Parents and students	Harm	Aware or reasonably suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering, harm	Principal: Tel (07) 3332 1300 principal@bggs.qld.edu.au Deputy Principal: Tel (07) 3332 1300 deputyprincipal@bggs.qld.edu.au Head of Junior School: Tel (07) 2100 7100 headofjuniorschool@bggs.qld.edu.au Dean of Students: Tel (07) 3332 1330 deanofstudents@bggs.qld.edu.au Head of House: Tel (07) 3332 1330 studentreception@bggs.qld.edu.au
	Inappropriate behaviour of a Staff member or behaviour that may constitute Reportable Conduct	Behaviour of a Staff member is inappropriate	Principal: Tel (07) 3332 1300 principal@bggs.qld.edu.au Deputy Principal: Tel (07) 3332 1300 deputyprincipal@bggs.qld.edu.au Dean of Students: Tel (07) 3332 1330 deanofstudents@bggs.qld.edu.au Head of Junior School: Tel (07) 2100 7100 headofjuniorschool@bggs.qld.edu.au Head of House: Tel (07) 3332 1330 studentreception@bggs.qld.edu.au

Appendix 2: Reporting procedures

(adapted from ISQ School Business Services Fact Sheet: Reporting by Legislation)

***IMPORTANT NOTE*: A single matter may be subject to more than one reporting obligation; you should consider each obligation in this Appendix 2 and whether it applies in the circumstances.**

Appendix 2A: Reporting of harm or suspected harm

Issue	If	Then
Referral of a **concern about harm that does not reach the level of a reportable suspicion** under Chapter 5A of the CP Act	**Staff who are teachers and registered nurses**	**Staff who are teachers and registered nurses**
	• You are a School Staff member who is a teacher or registered nurse; **and** • You have a concern about harm to a child, caused by any type of abuse, that does not reach the level of reporting to Child Safety Services, but you consider the child is likely to become a child in need of protection if no preventative support is given	1. Complete the School's reporting form (see **Appendix 3: Internal Reporting Harm Template**) 2. Discuss your concerns with the Principal 3. Work through the Child Protection Guide with the Principal 4. The Principal may decide to: • Offer support at the School level • Seek parental consent to refer to Family and Child Connect (FCC) and then make the referral • Refer a family to FCC without consent (**a Principal-only power**) 5. Keep appropriate records of your decisions and actions
	Principal	**Principal**
	• You are the Principal; **and** • A Staff member, including a teacher or registered nurse, reports a concern about harm to a child that does not reach the level of reporting to Child Safety Services, but considers that the child is likely to become a child in need of protection if no preventative support is given	1. Receive the School's reporting form 2. Work through the Child Protection Guide with the Staff member 3. Decide to: • Offer support at the School level • Seek parental consent to refer to FCC and then make the referral • Refer a family to FCC without consent (**a Principal-only power**) 4. Keep appropriate records of your decisions and actions, ensure relevant support is given, and follow up as necessary

Reporting of **harm**, including a **reportable suspicion** under section 13E and 13G of the CP Act	**Student or parent**	**Student or parent**
	• You are a student or parent; **and** • You are aware or reasonably suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering, harm	1. Report the harm or suspicion of harm to the Principal, Deputy Principal, Dean of Students, the Head of Junior School or a Head of House.
	Staff (other than teachers and registered nurses)	**Staff (other than teachers and registered nurses)**
	• You are a Staff member, other than a teacher or registered nurse; **and** • You are aware or reasonably suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering harm	1. Report the harm or suspicion of harm to the Principal, Deputy Principal, Dean of Students, the Head of Junior School or a Head of House. 2. Keep appropriate records of your actions
	Staff who are teachers and registered nurses (including Head of House, Dean of Students, Deputy Principal or Head of Junior School)	**Staff who are teachers and registered nurses (including Head of House, Dean of Students, Deputy Principal or Head of Junior School)**
	• You are a Staff member who is a teacher or registered nurse (including a Head of House, Dean of Students, Deputy Principal or Head of Junior School); **and** • You have a **reportable suspicion**, i.e. you form a reasonable suspicion that a child: a) has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by sexual or physical abuse; **and** b) may not have a parent able and willing to protect the child from the harm ➢ **Note**, if you are a Head of House, Dean of Students, Deputy Principal or Head of Junior School you may form the reasonable suspicion based on a report of harm that you receive from another Staff member, student or parent. If a report of harm you receive from another Staff member, student or parent does not reach the level of a reportable suspicion, follow the process immediately above.	1. Complete the School's reporting form (see **Appendix 3: Internal Reporting Harm Template**) 2. Confer with the Principal regarding your concerns 3. Work through the Child Protection Guide with the Principal 4. The Principal will report to Child Safety Services and/or the Police and will inform you of their report; this fulfils your duty to report as you know that Child Safety Services is aware of the concern ➢ You **may** report directly to Child Safety Services and/or the Police **and must do so** if you are not made aware of the report or otherwise are not satisfied that the Principal has made a report to Child Safety Services 5. Keep appropriate records of your decisions and actions

Reporting of **harm**, including a **reportable suspicion** under section 13E and 13G of the CP Act	**Principal** • You are the Principal; **and** • A Staff member has reported a reportable suspicion to you	**Principal** 1. Receive the School's reporting form 2. Work through the Child Protection Guide with the Staff member 3. Make a report to Child Safety Services (if appropriate, using **Appendix 4: External Reporting Harm Template**) 4. Inform the Staff member that you have made the report 5. Keep appropriate records of your decisions and actions, ensure relevant support is given, and follow up as necessary
Reporting **investigation of harm** under section 76 and 77 of the *Education (Queensland College of Teachers) Act 2005*	**Principal** • You are a Principal; **and** • The School is investigating, inquiring into or examining an allegation of harm caused, or likely to be caused, to a child because of the conduct of a teacher (or is referring the allegation to another entity to investigate, inquire into, examine or otherwise deal with)	**Principal** 1. If the allegation involves Reportable Conduct, notify the QFCC within 3 days. 2. As soon as practicable after the investigation starts, give notice to the Queensland College of Teachers 3. As soon as practicable after the School stops dealing with the allegation, give notice to the Queensland College of Teachers of the outcome ➢ See the Queensland College of Teachers' Employing Authority Notifications Guidelines for more information, including details about what each notice must contain, and ➢ The Queensland College of Teachers must also be notified of certain dismissals under section 78 of the *Education (Queensland College of Teachers) Act 2005*

Appendix 2B: Reporting of sexual abuse or likely sexual abuse

Issue	If	Then
Reporting of **sexual abuse** or **likely sexual abuse** under sections 366 and 366A of the EGP Act	**All Staff**	**All Staff**
	• You are a School Staff member; **and** • You are aware or reasonably suspect that a student under 18 years has been, or is likely to be, sexually abused by another person (irrespective of whether that person is a School Staff member)	1. **Immediately** complete the School's reporting form (see **Appendix 3: Internal Reporting Harm Template**) 2. Give the report to the Principal or a member of the Board **immediately** 3. The Principal or member of the Board will make a report **immediately** to the Police and inform you of their report 4. Keep appropriate records of your decisions and actions
	Principal	**Principal**
	• You are a Principal; **and** • A Staff member reports a concern that a student under 18 years has been, or is likely to be, sexually abused by another person (irrespective of whether that person is a School Staff member)	1. Receive the School's reporting form 2. Make a report to the Police **immediately** (if appropriate, using **Appendix 4: External Reporting Harm Template**) 3. Keep appropriate records of your decisions and actions
	• You are a Principal; **and** • You are the first person to be aware or reasonably suspect a student under 18 years has been, or is likely to be, sexually abused by another person (irrespective of whether that person is a School Staff member)	1. Make a report to the Police **immediately** (if appropriate, using **Appendix 4: External Reporting Harm Template**) 2. Give the Board a copy of the report **immediately** 3. Keep appropriate records of your decisions and actions, ensure relevant support is given, and follow up as necessary
	Member of the Board	**Member of the Board**
	• You are a member of the School's Board; **and** • A Staff member reports a concern that a student under 18 years has been, or is likely to be, sexually abused by another person	1. Receive the School's reporting form 2. Make a report to the Police **immediately** (if appropriate, using **Appendix 4: External Reporting Harm Template**) 3. Keep appropriate records of your decisions and actions, ensure relevant support is given, and follow up as necessary

Appendix 2C: Reporting of inappropriate behaviour and Reportable Conduct

Issue	If	Then
Reporting of **inappropriate behaviour** under section 16 of the *Education (Accreditation of Non-State Schools) Regulations 2017* and section 33 of the *Child Safe Organisations Act* 2024	**Student or parent**	**Student or parent**
	• You are a student or parent; **and** • A Staff member at the School has behaved in a way you consider is inappropriate, or • You have a reasonable believe that a worker has committed Reportable Conduct; or misconduct that may involve Reportable Conduct	1. Report the behaviour the Principal, Deputy Principal, Dean of Students, the Head of Junior School or a Head of House. 2. Inappropriate behaviour that may be considered Reportable Conduct can be reported directly to the QFCC.
	All Staff	**All Staff**
	• You are a Staff member; **and** • A student has reported to you behaviour of another Staff member that the student considers is inappropriate **or** a Staff member has behaved in a way you consider is inappropriate, or may constitute Reportable Conduct*	1. Complete the School's reporting form (see **Appendix 3: Internal Reporting Harm Template**) 2. Discuss the student's report with your Principal (or, if you suspect the Principal is involved, a member of the Board) 3. The Principal (or a member of the Board) will take appropriate action in the circumstances 4. Keep appropriate records of your decisions and actions *inappropriate behaviour that may be considered Reportable Conduct can be reported directly to the QFCC

Issue	If	Then
	Principal or member of Board	**Principal**
	• You are the Principal or a member of the Board; **and** • A Staff member has reported to you the inappropriate behaviour of another Staff member	1. Receive the School's reporting form 2. If there is a reasonable belief that the inappropriate behaviour constitutes Reportable Conduct, then notify the QFCC within 3 business days 3. Undertake an internal or external investigation which may include the following: • Interview the student(s) involved, including any student reporting the behaviour • Interview the Staff member alleged to have engaged in inappropriate behaviour • Interview any other person who may be able to provide useful information 3. Take appropriate action on the basis of the investigation 4. Inform the reporting Staff member of the action taken (where appropriate) 5. Keep appropriate records of your decisions and actions, ensure relevant support is given, and follow up as necessary 6. If the inappropriate behaviour constitutes Reportable Conduct, then provide an interim report within 30 days to the QFCC, followed by a final report once the matter has been resolved

Appendix 2D: Reporting of child sexual offence|

Issue	If	Then
Reporting belief of **child sexual offence** under section 229BC of the Criminal Code	**Adults (including Staff, parents, students 18 years or over and the Board)**	**Adults (including Staff, parents, students 18 years or over and the Board)**
	• You are an adult; **and** • You gain information that causes you to believe on reasonable grounds, or ought reasonably to cause you to believe, that a child sexual offence is being or has been committed against a child by another adult at a time when the child is or was under 16 years or was 16 or 17 years with an impairment of mind	1. **As soon as reasonably practicable**: • Disclose the information to the Police, **or** • Report the information to the Principal or Deputy Principal or the Principal by completing the School's reporting form (see **Appendix 3: Internal Reporting Harm Template**) 2. If you report to the Principal or Deputy Principal, the Principal or Deputy Principal will disclose the information to the Police and inform you of that disclosure ➢ You **must** report directly to the Police if you are not made aware of the disclosure or otherwise are not satisfied that the disclosure to Police has been made 3. Keep appropriate records of your decisions and actions
	Principal or Deputy Principal	
	• You are the Principal or Deputy Principal; **and** • You receive a report from any adult with information about the commission of a child sexual offence	1. Receive the School's reporting form 2. Disclose the information to the Police (if appropriate, using **Appendix 4: External Reporting Harm Template**) 3. If the adult is a worker, then notify the QFCC of the allegation 4. Inform the reporting adult of your disclosure to the Police 5. Keep appropriate records of your decisions and actions, ensure relevant support is given, and follow up as necessary

Appendix 3: Internal reporting harm template

This form is for use by all staff when reporting harm, sexual abuse, child sexual offences, inappropriate behaviour or behaviour relating to Reportable Conduct. Refer to the *Child Protection Policy*.

Terms in this form have the meaning given in the School's *Child Protection Policy*.

SECTION 1: DETAILS OF PERSON PREPARING REPORT	
Full name	
Position title	
Type of staff member (tick)	☐ I am a staff member other than a teacher or registered nurse (**go to Section 2**) ☐ I am a staff member who is a teacher or registered nurse (**go to Section 2A**)
SECTION 2: REASON FOR MAKING REPORT **(Only complete if you are a staff member other than a teacher or registered nurse)**	
Why are you making this report?	☐ I am aware or reasonably suspect that a student under 18 years has been, or is likely to be, sexually abused by a person ☐ I have gained information that causes me to believe on reasonable grounds that a child sexual offence is being or has been committed against a child by another adult at a time when the child is or was under 16 years, or is or was 16 or 17 years with an impairment of mind ☐ I wish to report inappropriate behaviour by another staff member
SECTION 2A: REASON FOR MAKING REPORT **(Only complete if you are a staff member who is a teacher or registered nurse)**	
Why are you making this report?	☐ I have received a report from a student, parent or other Staff member regarding harm or suspected harm to a student ☐ I have a reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical abuse or sexual abuse, and may not have a parent able and willing to protect them from the harm (a reportable suspicion) ☐ I do not have a reportable suspicion, but consider that a child is likely to become a "child in need of protection" if no preventative support is given ☐ I am aware or reasonably suspect that a student under 18 years has been, or is likely to be, sexually abused by a person ☐ I have gained information that causes me to believe on reasonable grounds that a child sexual offence is being or has been committed against a child by another adult at a time when the child is or was under 16 years, or is or was 16 or 17 years with an impairment of mind ☐ I wish to report inappropriate behaviour by another staff member

SECTION 3: DETAILS OF AFFECTED CHILD	
Child's name	
Age	
Sex	
Year / House	
Child's contact details (e.g. address)	
SECTION 4: DETAILS OF ALLEGED HARM, SEXUAL ABUSE, CHILD SEXUAL OFFENCE OR INAPPROPRIATE BEHAVIOUR	
Date(s) of harm, sexual abuse, child sexual offence or inappropriate behaviour	
Person(s) who may have caused the harm or engaged in sexual abuse, child sexual offence or inappropriate behaviour	
Details of the harm, sexual abuse, child sexual offence or inappropriate behaviour (include as much information as possible)	
For teachers and registered nurses only: **If you have a reportable suspicion, on what basis did you form that suspicion?**	
If you are aware of or reasonably suspect sexual abuse or likely sexual abuse, on what basis did you form that awareness or suspicion?	
Are there any other persons who may be able to give information about the harm, sexual abuse, child sexual offence or inappropriate behaviour?	
SECTION 5: ACTIONS TAKEN	
Have you taken any action to date in relation to the matter apart from this report?	
SECTION 6: DATE OF REPORT	
Date report prepared	_____ / _____ / _____

Appendix 4: External reporting harm template

(adapted from ISQ School Services)

Private and Confidential
Report of Suspected or Likely Harm, Sexual Abuse or Child Sexual Offence
Child Protection Act 1999 (Qld) chapter 2 part 1AA
Education (General Provisions) Act 2006 (Qld) chapter 12, part 10
Criminal Code Act 1899 (Qld) section 229BC

Date:	
School:	
School Phone:	
School Email:	
School Address:	
DETAILS OF STUDENT/CHILD HARMED, AT RISK OF HARM/ABUSE OR THE SUBJECT OF A CHILD SEXUAL OFFENCE:	
Legal Name:	Preferred Name:
DOB:	Gender:
Year Level:	Cultural Background:
Primary language spoken:	
☐ Aboriginal ☐ Torres Strait Islander ☐ Aboriginal and Torres Strait Islander	
Does the student have a disability as per NCCD: ☐ Yes ☐ No	Disability Category:
Student's Residential Address:	Phone:
	Student's Personal Mobile:
FAMILY DETAILS	
Parent/caregiver 1:	Relationship to Student:
Address (if different from student):	
Phone: (H): (W): (M):	
Parent/caregiver 2:	Relationship to Student:
Address (if different from student):	
Phone: (H): (W): (M):	
Is the student in out of home care? Yes ☐ No ☐	
Are there any Family Court or Domestic Violence orders in place? Yes ☐ No ☐ Unknown ☐	

PERSON ALLEGED TO HAVE CAUSED THE HARM, ABUSE OR CHILD SEXUAL OFFENCE		
☐ Adult family member	☐ Child family member	☐ Other adult
☐ Student/other child	☐ Unknown	

PROVIDE ALL INFORMATION YOU HAVE WHICH LED TO THE SUSPICION OF HARM, ABUSE OR BELIEF THAT A CHILD SEXUAL OFFENCE IS OR HAS BEEN COMMITTED (attach extra pages if necessary).

Details of any harm and/or sexual abuse to the student – please include: Time and date of the incident; source of information; details of person alleged to have caused the harm or sexual abuse or committed the child sexual offence; physical appearance of any injury; immediate and ongoing safety concerns; any disclosures made by student; any previous incidents of harm; behavioural indicators of harm; presence of any medical needs or developmental delays; and if the information relates to an unborn child, the alleged risk to the unborn child.

Please indicate the identity of anyone else who may have information about the harm, abuse and/or child sexual offence

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

Name of Staff member making report to the Statutory Agency if not the Principal: **Position:**	**Signature:**	**Date:**
Principal:	**Signature:**	**Date:**
Principal's email address:		
Response requested by school:		

ACTION TAKEN		
Form was emailed to (please tick which agencies the form was sent to):	☐	Queensland Police Services (QPS)
	☐	Department of Families, Seniors, Disability Services and Child Safety (Child Safety Services)
	☐	Family and Child Connect

(Adapted from EQ SP-4 Report of Suspected Harm or Risk of Harm)

Confirm receipt of emailed form and ensure original is stored in a secure location along with any other documentation collected for the purpose of this report.

Appendix 5: Useful definitions and key concepts

(adapted from ISQ School Services Fact Sheet)

What is a reportable suspicion?

In a school situation, as mandatory reporters, teachers and registered nurses must report to Child Safety a "reportable suspicion" about a child, formed in the course of their employment or engagement.

A reportable suspicion is one where a teacher has a reasonable suspicion that a child has suffered, is suffering, or is at an 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.

What are the two tests to be used when forming a reportable suspicion?

The key tests when forming a "reportable suspicion" are as follows:

1. The child must have suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by the physical or sexual abuse (known at the "*Significant Harm Test*"); and
2. The child may not have a parent able and willing to protect them from the harm (known as the "*Parent Test*").

Who is a mandatory reporter?

For the purposes of the Policy, a mandatory reporter under the CP Act includes, without limitation, teachers and registered nurses. All adults have mandatory reporting obligations under the Criminal Code and all Staff have mandatory reporting obligations under the EGP Act.

What is harm?

Harm is defined in section 9 of the CP Act as:

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:

- A single act, omission or circumstance; or
- A series or combination of acts, omissions or circumstances.

Harm means damage or injury caused by abuse to a child's body, to a child's emotional state or to a child's psychological state. Abuse may be physical abuse, sexual abuse, emotional abuse or neglect. Harm is the effect or impact on the child of the abuse.

Abuse can be defined as an action such as: hitting; punching; fondling; and exposure to domestic violence or scapegoating; or it can be inaction such as failure to provide medical care; or failure to provide appropriate stimulation.

Domestic violence is currently defined in the *Domestic and Family Violence Protection Act 2012* (Qld) as behaviour by a person (the **first person**) towards another person (the **second person)** with whom the first person is in a relevant relationship that:

- Is physically or sexually abusive;

- Is emotionally or psychologically abusive;
- Is economically abusive;
- Is threatening;
- Is coercive; or
- In any other way controls or dominates the second person and causes the second person to fear for the second person's safety or wellbeing or that of someone else.

The "Significant Harm Test"

When considering the significance of harm under mandatory reporting obligations, the CP Act provides guidance under section 13C.

The matters that the person may consider include:

- Whether there are detrimental effects on the child's body or the child's psychological or emotional state:
    - That are evident to the person; or
    - That the person considers are likely to become evident in the future
- In relation to any detrimental effects to the child the reporter may consider:
    - Their nature and severity; and
    - The likelihood that they will continue, and
- The child's age.

The person's consideration may be informed by an observation of the child, other knowledge about the child or any other relevant knowledge, training or experience that the person may have. This recognises that a school Staff member may detect an impact of harm for a child that the ordinary person may not identify.

The "Parent Test"

A parent may be willing to protect a child, but not have capacity to do so and therefore they are not considered "able". This includes situations such as where the parent's inability is due to factors such as intellectual impairment or ill health.

Alternatively, a parent may have the capacity to protect a child (able), but may choose not to do so (not willing). This might include situations where parents choose an ongoing relationship with a person who is abusing their child and are thus "unwilling" to protect the child.

If there is considered to be at least one parent "able" and "willing" to protect the child, the child is considered to not be in "need of protection".

What is sexual abuse?

Sexual abuse includes sexual behaviour involving the child/student and another person in the following circumstances:

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

Indicators of sexual abuse may include:

- Grooming behaviour (see below).
- Bruises, bite marks or other injuries to breasts, buttocks, arms, lower abdomen or thighs.
- Bruises, scratches or other injuries not consistent with accidental injury.
- Difficulty walking or sitting.
- Persistent headaches or recurrent abdominal pain.
- Unexplained pain in genital area.
- Torn, stained or bloodied underwear.
- Itching, soreness, discharge or unexplained bleeding.
- Painful and recurrent urination.
- Recurrent urinary tract infections.
- Signs of sexually transmitted diseases.
- Pregnancy in adolescents where the identity of the father is vague or secret.

What is a child sexual offence?

Under the Criminal Code, a child sexual offence is an offence of a sexual nature committed in relation to a child. This includes, for example, an offence against a provision of chapter 22 or chapter 32 of the Criminal Code, such as an offence relating to the making, distribution and possession of child exploitation material, rape or sexual assault.

What is grooming?

“Grooming” is a course of conduct by which a person creates or exploits opportunities that allow the person to safely engage in sexual contact with a child. Its purpose is to secure compliance of the child and to avoid detection and punishment. Whilst not always, sexual abuse can be preceded by grooming.

Grooming can occur over a long period. A person may also “groom” the child’s parents or carers, or other persons who may protect them from the abuse. This is so that the child and his/her carers will trust the offender and not suspect any intended wrongdoing. The establishment of a relationship of trust is often very confusing and damaging to the child, who may not even immediately recognise what is done to them as abuse.

Recognition of the grooming process that is used as a preparation for the sexual abuse of a child is an indicator of likely sexual abuse. Grooming behaviour may not be recognised when observed as a one-off event, but a pattern of grooming of the intended victim and/or the intended victim’s carers can be recognised. Grooming may tend to develop in intensity over time. It will also tend to include elements of secrecy and concealment, and be more likely to occur in places where the abuser is familiar and where the risk of detection is low.

It is important to be aware of the types of behaviours that can be used in the process of grooming, while remembering that some of the behaviours might equally reflect normal interactions based on genuine motives of care and concern. This is the reason that for Staff members the observance of clear professional boundaries and transparency in the declaration of potential conflicts of interest is a vital part of the protection of children and of the Staff members themselves. Some examples of grooming types of behaviour could include:

- Befriending a vulnerable student.
- Giving a student special attention.
- Treating the student more favourably than others, for example with school work or in extra-curricular activities.
- Directing suggestive jokes, remarks or actions towards the student.
- Acting as a substitute parent or confidant of the student.

- Giving gifts to or doing favours for the student.
- Sharing secrets with the student.
- Arranging opportunities to be alone with the student.
- Sending email or SMS messages of a personal nature.
- Making personal comments to the student about sexuality or relationships.
- Befriending the student's family and visiting the family home.
- Offering to babysit or provide transport.
- Offering individual coaching or special help to the student.
- Cultivating the trust and confidence of the student's parents.

What is 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
- Shaking
- Throwing
- Burning
- Biting
- Poisoning

Physical abuse is not determined by how bad the mark or injury is, but rather by the act itself that causes injury or trauma to the child.

Indicators of physical abuse may include:

- Student presents with bruises, burns or fractures at a frequency which is inconsistent with normal activity.
- Student offers explanations for an injury which appear inconsistent with that injury.
- Student or another person advises that he/she has been subjected to or threatened with physical harm.
- Reluctance/refusal of student to participate in swimming or other activities where getting changed or wearing more revealing clothes may show signs of harm.
- Absenteeism.

What is psychological emotional abuse?

Psychological or 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
- Exposure of a child to domestic and family violence

Indicators of emotional abuse may include:

- Student has poor peer relationships or is withdrawn or anxious.
- Student inclined to seek adult company and/or students who are older or younger.
- Student regularly avoiding going home.

- Student has learning difficulties, including poor concentration.
- Student socially withdraws including disengaging from School and School activities.
- Decline or underperformance in student's educational outcomes.
- Student engages in risk taking behaviour.
- Absenteeism.
- Student displays attention-seeking behaviour such as stealing, lying, running away, and repeatedly disrupting classes.

What is 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
- Housing
- Health care
- Adequate clothing
- Personal hygiene
- Hygienic living conditions
- Timely provision of medical treatment
- Adequate supervision

Indicators of neglect may include:

- Student appears underweight for age and body type
- Inadequate clothing
- Poor personal grooming
- Asking other students for food or money or not bringing food for lunches and breaks
- Absenteeism /or high frequency of illness/infection
- Student often arrives early and/or leaves late

What is inappropriate behaviour?

Any behaviour of a Staff member that a student, parent or other Staff member considers inappropriate. This includes behaviour of a Staff member that breaches any policies or procedures of the School.

What is Reportable Conduct?

Reportable Conduct means conduct by a staff member towards a child that falls within a category prescribed by applicable legislation.

Reportable Conduct categories are:

- A child sexual offence
- Sexual misconduct committed in relation to, or in the presence of, a child
- Ill-treatment of a child
- Significant neglect of a child
- Physical violence committed in relation to, or in the presence of, a child
- Behaviour that causes significant emotional or psychological harm to a child.

Reportable Conduct may arise from a single incident or a pattern of behaviour and may occur in person, online, or through the use of technology. Reportable Conduct may occur both at and outside of the workplace.

Who is a parent?

The parent of a child generally means the child's birth mother or father, or adoptive parents. Under the CP Act:

- A parent of a child is the child's mother, father or someone else having or exercising parental responsibility for the child.
- However, a person standing in the place of a parent of a child on a temporary basis is not a parent of the child.
- A parent of an Aboriginal child includes a person who, under Aboriginal tradition, is regarded as a parent of the child.
- A parent of a Torres Strait Islander child includes a person who, under Island custom, is regarded as a parent of the child.

What is Family and Child Connect?

Family and Child Connect (FCC) is a service which provides an identifiable and easily accessible central referral point for families and professionals to access family services.

What is a referrer?

A referrer is anyone who contacts FCC to refer a child or family for support and assistance. For schools, this person will most commonly be the Principal.

What is self-harm?

During their schooling, some students may be at risk of harming themselves. This harm may occur with or without suicidal intent; or may be symptomatic of, or associated with, a known medical condition or intellectual disability.

Risk factors for self-harm include:

- Previous attempts at suicide (most powerful risk predictor)
- Depression
- Drugs and/or alcohol abuse
- Conduct disorder
- Disruptive and unsupportive family background
- Relationship conflicts
- Poor coping skills
- Psychiatric illnesses
- Ready availability of lethal means to commit suicide
- Copycat behaviour after an incident of self-harm by another person
- Recent bereavement
- Chronic physical illness
- Anniversary phenomenon (of past losses or major life events)
- Early loss experiences
- Academic failure
- Perfectionism and overachievement as a result of students having high expectations of themselves