



# Child Risk Management Strategy

## 1 Purpose

The purpose of this Child Risk Management Strategy (**Strategy**) is to implement employment practices and procedures to promote the safety and wellbeing of all students at Brisbane Girls Grammar School (the **School**).

## 2 Scope

This Strategy 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**).

## 3 Statement of Commitment

The School is committed to the safety and wellbeing of students enrolled at the School and the protection of students from harm<sup>1</sup>.

The School is dedicated to eliminating and minimising risks to child safety through this Strategy which includes and refers to various other policies and procedures of the School designed to address the safety and wellbeing of its students.

This Strategy is evidence of the School's commitment to the safety and wellbeing of children and the protection of children from harm in fulfilment of the requirements of schedule 1, section 2(1) of the *Working with Children (Risk Management and Screening) Regulation 2020 (Qld)* (**Regulation**).

## 4 Implementation

In practice, the School's commitment to the safety and wellbeing of students and the protection of students from harm means that it will implement the measures outlined below.

### 4.1 Codes of Conduct

The School requires our Staff to conduct themselves as follows:

- (a) School 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<sup>2</sup>.
- (b) Specific responsibilities include:
  - Staff should avoid situations where they are alone in an enclosed space with a student.
  - Staff must not develop a relationship with any student that is, or that can be interpreted as having a personal rather than a professional interest in a student.
  - Staff must not have a romantic or sexual relationship with a student.

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<sup>1</sup> *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(7)*: the definition of 'harm' for this regulation is the same as in section 9 of the *Child Protection Act 1999 (Qld)*

<sup>2</sup> *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(1)*

- (c) Staff must comply with School policies, including the *Child Protection Policy*, *Protective Practices Policy* and, where applicable, *Code of Ethics for Teachers*.

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

#### 4.2 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 children. In particular, the School will:

- (a) Ensure that its recruitment and selection procedures act to reduce the risk of harm to children 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 is necessary for the successful applicant, the responsibilities and supervision associated with the position, the nature and environment of the service provided to children, and the experience and qualifications required by the successful applicant;
  - Advertising positions with a clear statement in the position description about the School's commitment to safe and supportive work practices and identifying that candidates will be subject to a teacher registration check or Blue Card screening, a police check, referee checks, identification verification and the requirement to disclose any information relevant to the candidates' eligibility to engage in activities including 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;
  - At least two reference checks for all new 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; and
  - A probationary period of employment, which allows the School to further assess the suitability of the new employee and to act as a check on the selection process.
- (b) Ensure that its training and management procedures act to reduce the risk of harm to children from Staff via<sup>3</sup>:
- Management processes that are consistent, fair and supportive;
  - Performance management processes to help employees 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;

<sup>3</sup> *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)*

- An induction program which addresses the School’s policies and procedures, particularly its expectations regarding child risk management and to assist Staff to understand their role in providing a safe and supportive environment for children;
  - Training new and existing Staff on an ongoing basis to enhance skills and knowledge and to reduce exposure to risks, as follows:
    - The School’s policies and procedures;
    - Identifying, assessing and minimising risks to children; and
    - Handling a disclosure or suspicion of harm to a child;
  - 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 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.
- (c) 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.

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

#### 4.3 Handling Disclosures or Suspicions of Harm

All disclosure or suspicions of harm or likely harm should be handled in accordance with the School’s *Child Protection Policy*<sup>4</sup>.

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

#### 4.4 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*, *Employee Grievance Resolution Policy* and *Complaints Resolution Policy*, and this is evidence of fulfilment of the requirements of schedule 1, section 2(5) of the Regulation.

#### 4.5 Implementing and Reviewing this Strategy

This Strategy in its entirety and its related policies and procedures are evidence of fulfilment of the requirements of schedule 1, section 2(6)(a) of the Regulation relating to implementation<sup>5</sup>.

The “Compliance and Monitoring” section below states the School’s commitment to reviewing this Strategy and is evidence of fulfilment of the requirements of schedule 1, section 2(6)(a) of the Regulation.

<sup>4</sup> Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)(c)

<sup>5</sup> Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)

#### 4.6 Blue Card Policies and Procedures

The School is committed to acting in accordance with Chapter 8 of the *Working with Children (Risk Management and Screening) Act 2000* (Qld) (**Act**) relating to the screening of employees and the No Card, No Start legislation, in such a way that limits risks to children. In particular, the School will not:

- (a) employ or engage any person without a positive notice blue card (if they are required to hold one in accordance with the Act and the No Card, No Start legislation)
- (b) continue the employment or engagement of any person who:
  - does not renew their blue card within the required renewal period as required by the No Card, No Start legislation
  - is unable to present a current blue card as required by the No Card, No Start legislation
  - does not provide identification documents where applicable
  - is issued with a **negative notice**
  - becomes a **restricted person**, including those in **restricted employment**
  - has their blue card cancelled or suspended, or
  - does not consent to pre-employment screening (employees only).

In addition, the School will:

- (c) require relevant employees, contractors, volunteers, trainee students and School Board members to sign an acknowledgment of the No Card, No Start legislation and confirming they are not a **restricted person**
- (d) submit a 'no longer with organisation form' when appropriate
- (e) appoint a School contact person who will be responsible for managing the screening process and all related documentation and records
- (f) keep written records of all the above actions, decisions and outcomes, including the dates of expiry of blue cards
- (g) ensure that all information in relation to blue cards is kept confidential, and
- (h) act to remind Staff to keep their blue card up to date.

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

#### 4.7 High Risk Management Plans

The School is committed to identifying risks, assessing risks, eliminating and minimising risks and the monitoring of risk to the safety of children on an ongoing basis. The School will utilize various risk management tools to assist it in this process and will keep appropriate records of decisions made and actions taken in relation to risks to children. For example:

- (a) The School has an *Excursion and Tour Policy* that specifies requirements to manage the risks of these activities; and
- (b) The School has risk registers for sports undertaken by students.

This commitment is evidence of the School's fulfilment of the requirements of schedule 1, section 2(7)(g) of the Regulation.

#### 4.8 Strategies of Communication and Support

The School's commitment to making this Strategy available to students, parents and Staff via its Learning Management System (Minerva) and by hard copy from the School's administration by request is evidence of fulfilment of the requirements of schedule 1, section 2(8)(a) of the Regulation<sup>6</sup>.

The School is committed to training Staff in relation to risks to children and will conduct this training regularly via as applicable, induction, annual formal training events, informal updates at Staff meetings and discussions between managers and their Staff, and this is evidence of fulfilment of the requirements of schedule 1, section 2(8)(b) of the Regulation.

### 5 Responsibilities

The School is responsible for developing and implementing this Strategy and related policies and procedures to ensure it fulfils its obligations.

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

### 6 Compliance and Monitoring

The School is committed to review of this Strategy at least once every two years. The School will also record, monitor and report to the Board of Trustees 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.

### 7 Definitions

- (a) A **blue card** (or positive notice blue card) is a card issued by the Department of Justice and Attorney-General (DJAG) once checks have been completed to assess if a person is eligible to work in the areas of child-related work covered by the Act (eligible persons are issued a positive notice and a blue card).
- (b) A **child in need of protection** is a student 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) **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.

<sup>6</sup> *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)*

- Harm can be caused by:
    - physical, psychological or emotional abuse or neglect; or
    - sexual abuse or exploitation.
  - Harm can be:
    - a single act, omission or circumstance; or
    - a series or combination of acts, omissions or circumstances.
- (d) A **negative notice** is issued by the DJAG if a blue card application is not approved, along with information for the reasons the application was not approved and the appeals process.
- (e) **Restricted employment** refers to situations or exemptions that allow a person to work with children without a blue card, such as if they are:
- a volunteer parent
  - a volunteer who is under 18
  - paid or unpaid staff who work in regulated child-related employment for not more than 7 days in a calendar year
  - a consumer at a child-related service outlet where they also carry out work at the outlet
- (f) A **restricted person** is a person who either:
- has been issued a negative notice
  - has a suspended blue card
  - is a disqualified person
  - has been charged with a disqualifying offence that has not been finalised.
- (g) **Staff** includes 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.

## 8 Related Documents

### 8.1 Legislation

*Child Protection Act 1999 (Qld)*

*Child Protection Regulation 2011 (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 (Risk Management and Screening) Act 2000 (Qld)*

*Working with Children (Risk Management and Screening) Regulations 2020 (Qld)*

## 8.2 School Policies and Procedures

Child Protection Policy

Code of Ethics for Teachers (QCT)

Complaints Handling Policy

Employee Grievance Resolution Policy

Protective Practices Policy

Staff References Policy

Tours and Excursions Policy

Work Health and Safety Policy and Procedures