Caboolture Montessori School

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# 1.30 Policy - Child Protection & Risk Management

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| **Purpose** | This policy provides written processes about –<br>(a) How the School will respond to harm, or allegations of harm, to students under 18 years; and<br>(b) the appropriate conduct of the School's staff and students.<br>Which complies with accreditation requirements. | | |
| **Scope** | All children, families, visitors, 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 Caboolture Montessori School (herein referred to as 'the School') | | |
| **Responsibility** | The School Board | **Point of Contact** | Principal |

**Legislation**

- *Child Protection Act 1999 (Qld)*
- *Child Safe Organisations Act 2024 (Qld)*
- *Education and Care Services Act 2013 (ECS Act)*
- *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)*
- *Working with Children (Risk Management and Screening) Act 2000 (Qld)*
- *Working with Children (Risk Management and Screening) Regulation 2020 (Qld)*
- *Criminal Code Act 1899 (sections 229BB and 229BC)*
- *ACECQA National Quality Standard*
- *ACECQA Education & Care Services National Law Act 2011 (QLD)*
- *Education & Care Services National Regulations 2011*

**Related Documents**

**Whole School Policies**

- 1.30 Procedure - Child Protection
- 1.30 Form - Child Protection Reporting Form
- 2.20 Policy - Complaints Handling
- 2.20 Procedure - Complaints Handling
- 4.80 Policy - Work Health and Safety

**Cycle 1 Policies**

- Technology Policy
- Behaviour Guidance Policy
- Child Safe Environment Policy
- Code of Conduct Policy
- Dealing with Complaints Policy
- Family Communication Policy
- Health and Safety Policy
- Interactions with Children, Family and Staff Policy
- Nappy Change and Toileting Policy
- Privacy and Confidentiality Policy
- Recruitment Policy
- Respect for Children Policy
- Responsible Person Policy
- Safe Use of Digital Technologies and Online Environments Policy
- Staffing Arrangements Policy
- Student, Volunteer and Visitors Policy
- Supervision Policy
- Work Health and Safety Policy

## Definitions & Key Terms

To make it easier for your audience, provide definitions of key terms that may not be used every day.

| Term | Definition |
|---|---|
| **Harm** | As per s 9 of the *Child Protection Act* 1999, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.<br>1. It is immaterial how the harm is caused.<br>2. Harm can be caused by—<br>a) physical, psychological or emotional abuse or neglect; or<br>b) sexual abuse or exploitation.<br>3. Harm can be caused by—<br>a) a single act, omission or circumstance; or<br>b) a series or combination of acts, omissions or circumstances. |
| **Child in need of protection** | As per s10 of the *Child Protection Act* 1999, is a child who—<br>a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and<br>b) does not have a parent able and willing to protect the child from the harm. |
| **Child Abuse** | The World Health Organisation ([WHO & ISPCAN], 2006, p. 9) defines child abuse and neglect as:<br>*"All forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power." (Australian Government, Australian Institute of Family Studies)* |
| **Sexual Abuse** | As per s364 of the *Education (General Provisions) Act* 2006, in relation to a relevant person, includes sexual behaviour involving the relevant person and another person in the following circumstances—<br>(a) the other person bribes, coerces, exploits, threatens or is violent toward the relevant person;<br>(b) the relevant person has less power than the other person;<br>(c) there is a significant disparity between the relevant person and the other person in intellectual capacity or maturity. |
| **Mandatory Reporting** | Is the legislative requirement for selected classes of people to report suspected child abuse and neglect to government authorities. In Queensland (QLD), mandatory reporting is regulated by the *Child Protection Act 1999*. |

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| **Mandatory Reports** | Mandatory reporters in Queensland, are people who deliver the following services, wholly or partly, to children as part of their paid or professional work:<br>• teachers<br>• doctors<br>• registered nurses<br>• police officers with child protection responsibilities<br>• a person performing a child advocate function under the public guardian act 2014<br>• early childhood education and care professionals<br>All staff have a responsibility to recognise and respond to concerns for safety, welfare and the wellbeing of children and young people, and to report these concerns to management and Child Safety. |
| **Child Safe Standards** | The 10 mandatory standards that provide a framework for creating a child-safe culture, as defined in the Child Safe Organisations Act. |
| **Universal Principle** | The mandatory requirement to provide an environment that promotes and upholds the cultural safety of Aboriginal and Torres Strait Islander children. |
| **Reportable Conduct** | Conduct by a staff member or volunteer that includes sexual offences, sexual misconduct, ill-treatment, neglect, or physical violence towards a child. |
| **Restricted Person Declaration** | A formal, legally binding declaration signed by an individual (such as a prospective staff member or volunteer) confirming they are not a "restricted person" under the *Working with Children (Risk Management and Screening) Act 2000* (Qld). A restricted person includes anyone who has been issued a negative notice, has had their Blue Card suspended, or has been convicted of a disqualifying offence, making it a criminal offence for them to work or volunteer with children. |

## Policy Statement & Background

The School is committed to providing a child safe environment where children's safety and wellbeing is supported and children feel respected, values and encouraged to reach their full potential. We have zero tolerance for child abuse, and we comprehend our duty of care responsibilities to protect children from all types of abuse and neglect. We will always adhere to our moral and legislative obligations, and embed child safety in our daily practices, policies, and procedures. We will ensure all staff and volunteers understand the meaning, importance, and benefits of providing a child safe environment and critically understand their obligations and requirements as mandatory reporters.

Additionally, we embed the 10 Child Safe Standards and Universal Principle for creating culturally safe environments for Aboriginal and Torres Strait Islander children and their families[1].

[1] QFCC, Guidelines for implementing the Universal Principle and Child Safe Standards in Queensland

## Types of Abuse & Neglect

Child abuse is any action towards a child or young person that harms or puts at risk their physical, psychological, or emotional health or development. Child abuse can be a single incident or can be a number of different incidents that take place over time. There are different forms of child abuse: physical abuse, sexual abuse, emotional abuse, and neglect.

### Types of Abuse and Neglect

The QLD Government identifies the following types of abuse and neglect:

- physical
- sexual
- emotional
- neglect

There are common physical and behavioural signs that may indicate abuse or neglect. The presence of one of these signs does not necessarily mean abuse or neglect. Behavioural or physical signs which assist in recognising harm to children are known as indicators.

One indicator on its own may not imply abuse or neglect. However, a single indicator can be as important as the presence of several indicators. Each indicator needs to be deliberated in the perspective of other indicators and the child's circumstances. A child's behaviour is likely to be affected if he/she is under stress. There can be many causes of stress, and it is important to find out specifically what is causing the stress. Abuse and neglect can be single incidents or ongoing and may be intentional or unintentional. The QLD Government provides definitions and physical indicators: Types of child abuse

## Child Protection Guide

Professionals who encounter concerns related to abuse or neglect of children will use the online Child Protection Guide (CPG) to assist in making decisions about where to report or refer their concerns.

The online Child Protection Guide is a tool to assist professionals' decision making if concerns arise about a child who appears:

- to have experienced or is likely to experience significant harm AND
- may not have a parent willing and able to protect them from harm.

The CPG will help professionals decide to report to the Department of Child Safety, Youth and Women (Child Safety) or refer to other service providers, to help families receive appropriate supports.

## Blue Cards

Queensland's Working with Children Check is administered by the Blue Card Services. Blue Card Services monitors and audits service providers to ensure compliance including risk management to ensure that appropriate safeguards are implemented and maintained to protect children from harm. The School will not employ or engage a person who does not hold a valid Blue Card.

# Health & Safety

Caboolture Montessori School has written policies and processes in place to enable it to comply with the requirements of the *Work Health and Safety Act 2011* (Qld), the *Working with Children (Risk Management and*

*Screening) Act 2000* (Qld), the *Working with Children (Risk Management and Screening) Regulation 2020,* the *Child Safe Organisations Act,* and the *National Model Code and Guidelines* for taking images or videos of children released by *ACECQA 2024*.

## Responding to Reports of Harm

When the School receives any information alleging 'harm'[2] to a student (other than harm arising from physical or sexual abuse) it will deal with the situation compassionately and fairly so as to minimise any likely harm to the extent it reasonably can. Information relating to physical or sexual abuse is handled under obligations to report set out in this policy[3].

## Managing Disclosures

A disclosure of harm emerges when someone, including a child, tells you about harm that has happened or is likely to happen. When a child discloses that they have been abused, it is an opportunity for an adult to provide immediate support and to assist in protecting the child.

Disclosure is about seeking support; your response can have a significant impact on the child's ability to seek further help and recover from trauma.

### Procedure for Receiving a Disclosure [4]

When receiving a disclosure of harm, the person receiving the disclosure will:

- **Listen:** Give the child or young person your full attention. Remain calm and find a quiet place to talk where you can hear them properly (asking permission to move if necessary).
- **No False Promises:** Do **not** make promises that cannot be kept. Specifically, never promise confidentiality (e.g., "I won't tell anyone").
- **Honesty:** Gently tell the child that they have done the right thing by speaking up and explain that you will need to tell someone whose job it is to help keep them safe.
- **Minimal Questioning:** Only ask enough questions to confirm the need to report the matter. Do not interrogate or ask leading questions, as this can cause distress, confusion and compromise police or child safety investigations.
- **Patience:** Let the child use their own words and take their time.
- **Reassurance:** Reassure the child that the abuse is not their fault.
- **Cultural Safety:** Support culturally and linguistically diverse children and children with additional needs to express themselves in their preferred way of communicating[5].
- **Do Not Investigate:** Do not attempt to conduct your own investigation, mediate between parties, or confront the alleged perpetrator.

[2] *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)*
[3] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(1)*
[4] *Responding to children and young people's disclosures of abuse, Australian Institute of Family Studies*
[5] *ACECQA - NQF Safe Culture Guide*

### Documenting the Disclosure

As soon as possible after the conversation, the staff member must create a written record (using the *Report of Suspected Harm Form*) ensuring the details are accurately captured, including:

- **Time, date, and place** of the disclosure.
- **'Word for word'** account of what happened and what was said (using the child's exact language), including anything you said, and any immediate actions taken.
- **Date and signature** of the person making the report.

## Conduct of Staff and Students

All staff will ensure that their behaviour towards, and relationships with students reflect proper standards of care. Staff, contractors, and volunteers must not cause harm to students[6].

At Caboolture Montessori School employees are expected to always behave in ways that promote the safety, welfare, and well-being of our students. Employees must actively seek to prevent harm to students, and to support those who have been harmed. Guides and educators have an important role to support children and young people and to identify concerns that may jeopardise their safety, welfare, or wellbeing including:

- A duty of care to ensure that reasonable steps are taken to prevent harm to children.
- Obligations are met under child protection legislations.
- Obligations are met under work, health, and safety legislation.

Specific responsibilities include:

- Avoiding situations where they are alone in an enclosed space with a student.
- When physical contact with a student is a necessary part of the teaching/learning experience, employees must exercise caution to ensure that the contact is appropriate and acceptable and must always advise the student of what they intend doing and seek their consent.
- Never developing a relationship with any student that is, or that can be interpreted as having a personal rather than a professional interest in a student.
- Never having a romantic or sexual relationship with a student.

## Reporting Inappropriate Behaviour

If a student considers the behaviour of a staff member to be inappropriate, the student should report the behaviour to:

- Any teacher, or staff member;
- Luke Bartlett, Principal; or
- Rana Suluvale, Assistant to the Principal; or
- Kiri Drew, Nominated Supervisor[7];

**Note:** Any staff member who receives a report of inappropriate behaviour is required to immediately notify the Principal or Nominated Supervisor to ensure the formal reporting and investigation process is initiated.

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[6] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(1)*
[7] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2) and s.16(3)*

## Dealing with Report of Inappropriate Behaviour

A staff member who receives a report of inappropriate behaviour must report it to the Principal. Where the Principal is the subject of the report of inappropriate behaviour, the staff member must inform a director of the School's governing body[8]. Reports will be dealt with under the School's Complaints Handling Policy, ensuring processes are child-focused and accessible to students.

### Reporting Sexual Abuse[9]

Section 366 of the *Education (General Provisions) Act 2006* states 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 sexually abused by another person:

a) a student under 18 years attending the School;
b) a kindergarten aged child registered in a kindergarten learning program at the School;
c) a person with a disability who:
   i. under section 420(2) of the *Education (General Provisions) Act* 2006 is being provided with special education at the school; and
   ii. is not enrolled in the preparatory year at the school.

then the staff member must give a written report about the abuse or suspected abuse to the Principal or to a director of the School's governing body immediately.

The School's Principal or the director must immediately give a copy of the report to a police officer.

If the first person who becomes aware or reasonably suspects 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 give a copy of the report to a director of the School's governing body immediately.

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 sexually abused by another person;
d) details of the abuse or suspected abuse;
e) any of the following information of which the first person is aware:
   i. the student's age;
   ii. the identity of the person who has abused, or is suspected to have abused, the student;
   iii. the identity of anyone else who may have information about the abuse or suspected abuse[10].

[8] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)*
[9] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)(c)*
[10] *Education (General Provisions) Regulation 2017 (Qld) s.68*

## Reporting Likely Sexual Abuse [11]

Section 366A of the *Education (General Provisions) Act 2006* states that if a staff member reasonably suspects in the course of their employment at the School, that any of the following is likely to be sexually abused by another person:

a) a student under 18 years attending the School;
b) a kindergarten aged child registered in a kindergarten learning program at the School;
c) a person with a disability who:
   i. under section 420(2) of the *Education (General Provisions) Act* 2006 is being provided with special education at the School; and
   ii. is not enrolled in the preparatory year at the School.

then the staff member must give a written report about the suspicion to the Principal or to a director of the School's governing body immediately.

The School's Principal or the director must immediately give a copy of the report to a police officer.

If the first person who reasonably suspects likely sexual abuse is the School's Principal, the Principal must give a written report about the suspicion to a police officer immediately and must also give a copy of the report to a director of the School's governing body immediately.

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 reasonably suspecting that the student is likely to be sexually abused by another person;
d) any of the following information of which the first person is aware:
   i. the student's age;
   ii. the identity of the person who is suspected to be likely to sexually abuse the student;
   iii. the identity of anyone else who may have information about suspected likelihood of abuse[12].

## Reporting Physical and Sexual Abuse [13]

Under Section 13E(3) of the *Child Protection Act 1999*, if a doctor, a registered nurse, a teacher or an early childhood education and care professional forms a 'reportable suspicion' about a child "in the course of their engagement in their profession", they must make a written report.

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.

The doctor, nurse, teacher or early childhood education and care professional must give a written report to the Chief Executive of the Department of Families, Seniors, Disability Services and Child Safety (or another

[11] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(2)(c)*
[12] *Education (General Provisions) Regulation 2017 (Qld) s.69*
[13] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16 (2)(d)*

department administering the *Child Protection Act 1999*). The doctor, nurse, teacher or early childhood education and care professional should give a copy of the report to the Principal.

A report under this section must include the following particulars:

a) the basis on which the person has formed the reportable suspicion[14];
b) the child's name, age, and sex descriptor;
c) details of how to contact the child;
d) details of the harm to which the reportable suspicion relates;
e) particulars of the identity of the person suspected of causing the child to have suffered, suffer, or be at risk of suffering, the harm to which the reportable suspicion relates;

particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates[15].

### Queensland Child Services Contact Information

Regional Intake Services – Brisbane & Moreton Bay

**Phone: 1300 682 254** (Monday to Friday, between 9am to 5pm)

Child Safety After Hours Service Centre

**Phone: 1800 177 135** (Outside of business hours.)

## Confidentiality

It is important that any notification remains confidential, as it is vitally important to remember that no confirmation of any allegation can be made until the matter is investigated. The individual who makes the notification should not inform the suspected perpetrator (if known). This ensures the matter can be investigated without contamination of evidence or pre-rehearsed statements. It also minimises the risk of retaliation on the child for disclosing.

## Protection for Reporters

All reporters are protected against retribution for making or proposing to make a report.[16] The identity of the reporter is protected by law from being disclosed, except in certain exceptional circumstances. Provided the report is made in good faith:

- The report will not breach standards of professional conduct.
- The report cannot lead to defamation and civil and criminal liability.
- The report is not admissible in any proceedings as evidence against the person who made the report.
- A person cannot be compelled by a court to provide the report or disclose its contents.
- The identity of the person making the report is protected.

A report is also an exempt document under the *Freedom of Information Act* 1989.

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[14] *Child Protection Act 1999 s.13G (2)(a)*
[15] *See Child Protection Regulation 2023 (Qld) s.4 "Information to be included in reports"*
[16] *Child Protection Act 1999, amendments effective 31 August 2020*

### Sharing of Information

Caboolture Montessori School is a "prescribed entity" under the *Child Protection Act 1999* (Qld). To ensuring the safety of our students, we assist in the coordination of multi-agency responses by sharing relevant information with other prescribed entities (such as Child Safety, the Police, or Family and Child Connect).[17]

- **Obtaining Consent:** Ideally, the School will seek the family's consent before sharing personal information. This consent may be verbal or written and will be documented in the student's file.
- **Sharing Without Consent:** Under Chapter 5A of the Act, the School may legally share information *without* consent if we reasonably believe it is necessary to protect a child from harm.[18]
- **Privacy Override:** The safety, wellbeing, and best interests of the child are paramount. Consequently, the legal obligation to protect a child overrides the parent's right to confidentiality or privacy.[19]

## Responsibilities and Duties

The *Criminal Code Act 1899* includes two offences that pertain to the failure to report a child sexual offence and the failure to protect a child against a child sexual offence. A child sexual offence is an offence of a sexual nature by an adult against a child under 16 years or a person with an impairment of the mind.

**Failure to Report[20]**

Under section 229BC of the Code, all adults must report sexual offences against a child by another adult to police as soon as reasonably practicable after the belief is, or ought reasonably to have been, formed. Failure to make a report, without a reasonable excuse, is a criminal offence. This offence applies to all adults inclusive of students 18 years or older, as well as parents/guardians and volunteers at the School. A reasonable excuse not to make a report under the *Criminal Code Act 1899* includes that a report has already been made under the *Education (General Provisions) Act 2006* (reporting sexual abuse or likely sexual abuse) and the *Child Protection Act 1999* (reporting significant harm or risk of significant harm) as per this policy.

**Failure to Protect[21]**

Under section 229BB of the Code, all adults in positions of power or responsibility within institutions to reduce or remove the risk of child sexual offences being committed must take reasonable steps to protect children in their care from a child sexual offence. A failure to protect is an offence.

### Caboolture Montessori School

**Reporting & Critical Response**

The Approved Provider (the School), management, and the Nominated Supervisor will take the following actions regarding any incident occuring within any part of the school (Early Childhood Service and Primary School, All Cycles.)

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[17] *Child Protection Act 1999* (Qld), Chapter 5A
[18] *Child Protection Act 1999* (Qld), s 159MD
[19] *Child Protection Act 1999* (Qld), s 5A
[20] *Criminal Code Act 1899 (Qld) s.229BC*
[21] *Criminal Code Act 1899 (Qld) s.229BB*

- Dial **000** if a child is at immediate risk and police or medical assistance is required.
- Report all instances (alleged or witnessed) of child abuse, including assault or sexual abuse (including grooming) to QLD Police within 24 hours.
- Notify Queensland Government, DFSDC Child Safety if there is a reasonable suspicion that a child has suffered, is suffering or is at unacceptable risk of suffering significant harm caused by physical or sexual abuse within 24 hours.
- Comply with the *Child Safe Organisations Act 2024* by notifying the Queensland Family and Child Commission (QFCC) of any reportable allegations against staff or volunteers within the required timeframe (3 business days).
- Report to the Queensland College of Teachers any investigations into allegations of harm caused, or likely to be caused, to a student because of the conduct of a relevant teacher at the School.[22]

Where an incident involving children enrolled in the Early Childhood Service (Cycle 1), the following additional actions will be taken:

- Notify the QLD Department of Education NQA-ITS (within 24 hours) of
    - any incident or allegation where it is reasonably believed that physical and/or sexual abuse of a child has occurred or is occurring while the child is being educated and cared for at the School.
    - any complaints alleging that a serious incident has occurred or is occurring in the School.
    - a serious incident, which may include physical or sexual abuse where emergency services attended the School.

Where an incident involves students enrolled in the Primary School (Prep-Year 6), following additional actions will be taken:

- Notify NSSAB (Non-State Schools Accreditation Board) of any sexual abuse allegations as required by accreditation standards.

## Operational Prevention & Environment

The Approved Provider (the School), management and the Nominated Supervisor will:

- Ensure all children are adequately supervised[23] and that premises (including toilets and nappy change area) is designed and maintained to facilitate supervision while respecting dignity.
- Ensure staff strictly adhere to the *National Model Code*[24] and are aware of the policies and associated procedures for the safe use of digital technologies and online environments. Staff must not use personal devices (phones/smartwatches) to take images of children. Only School-issued devices are to be used for documenting student learning.
- Maintain written records of all abuse allegations in accordance with the Privacy Act.
- Retain records relating to sexual abuse allegations for a minimum of **45 years.**

[22] *Education (Queensland College of Teachers) Act 2005, Sec 76*
[23] *ACECQA National Law, Sec 165*
[24] *ACECQA, National Model Code*

- Ensure that following any critical incident, affected children, families, and staff are provided with immediate access to support (counselling/debriefing).

**People, Culture & Training**

The Approved Provider (the School), management and the Nominated Supervisor will:

- Implement a rigorous recruitment process including reference checks and screening to ensure applicants align with the School's Child Safe culture.
    - All prospective applicants and volunteers are required to sign a Restricted Person Declaration.
- Ensure the School validates and links every staff member and volunteer (unless exempt) to the School's Blue Card portal **BEFORE** they commence work. Maintain a register of expiry dates.
- Ensure copies of this policy, the Staff Code of Conduct, and the Safe Use of Digital Technologies Policy are easily accessible to all staff and families (e.g., via the School Website and Parent Portal) and that families are explicitly informed of this policy upon enrolment.
- Provide all staff with:
    - Comprehensive induction regarding their mandatory reporting obligations.
    - Regular training on recognising signs of abuse (including grooming and sexual behaviours).
    - Training on trauma-informed care, effective supervision and monitoring, appropriate and inappropriate discipline (prohibiting corporal punishment and any discipline that is unreasonable in the circumstances[25]), and online abuse.
    - Specific training about the different ways children may express concerns, distress and disclose harm as well as the process for responding to disclosures from children-including a complaint that alleges a child is exhibiting sexual behaviours that may be harmful to the child or another child (ACECQA 2023)
- Critically reflect on policies, procedures, and practices (including supervision) annually and after every critical incident, and ensure these reflections involve staff and families to inform required changes.
- Ensure the *10 Child Safe Standards* are discussed regularly at team meetings.
- Provide leadership support to all staff to adhere to a **zero-tolerance stance**, ensuring they feel safe and empowered to report concerns without fear of retribution.
- Ensure work placement students, volunteers and/or visitors are never left alone with a child whilst in Cycle 1 under any circumstance.

## Staff

**Reporting & Critical Response**

All staff will:

- Contact the police on **000** if there is an immediate danger to a child and intervene if it is safe to do so.
- Respect what a child discloses, taking it seriously and follow up on their concerns through the appropriate channels

[25] *National Law Sec 166*

- Be aware of the requirement to report concern or have a suspicion that a child is at risk of abuse, harm, neglect or ill-treatment to the Approved Provider or Nominated Supervisor
- Report all instances (alleged or witnessed) of child abuse, including assault or sexual abuse (including grooming) to QLD Police within 24 hours
- Comprehend their obligations as mandatory reporters and their requirement to report any situation where they believe, on reasonable grounds, that a child is at risk of significant harm to Child Safety Services
- Prepare accurate records recording exactly what happened, conversations that took place and what was observed to pass on to the relevant authorities to assist with any investigation
- NOT investigate suspicion of abuse or neglect but collect only enough information to substantiate concerns and pass on to Child Safety Services or appropriate authority
- Identify and report any concerns and allegations of reportable conduct involving a staff member, volunteer or contractor to the Approved Provider within 24hours (Reportable conduct scheme in QLD will commence from 1 July 2026-Queensland Family and Child Commission-QFCC)
- Understand that allegations of abuse or suspected abuse against them are treated in the same way as allegations of abuse against other people.
- Refer families to appropriate agencies where concerns of harm do not meet the threshold of significant harm. These services may be located through Family and Child Connect. Family consent will be sought before making referrals.

**General Responsibilities & Conduct**

All staff are required to:

- Strictly adhere to this policy, the School's Code of Conduct Policy, and the 10 Child Safe Standards at all times.
- Foster a culture of openness, respect and cultural safety where children feel respected and safe to disclose risk of harm to children, or report abuse. Actively involve children in decision making processes where appropriate.
- Maintain a valid Blue Card and provide details to the School, unless you are exempt from holding a Blue Card as a Queensland Registered Teacher.
- Immediately advise the Principal of any change in Blue Card status, or of any circumstances that may affect their Blue Card status.
- not use, or have access to, any personal electronic devices, including mobile phones or smart watches used to take images or video of children at Cycle 1 in around the School where Cycle 1 may be present.
- Participate in comprehensive induction training, and annual child protection training which covers how to identify, understand, report, and respond to child maltreatment, abuse and harm through annual child protection training.
- Provide ongoing monitoring and follow-up for children's health and wellbeing.

## Work Placement Students & Volunteers

All volunteers, practicum students attending the School for their work placement are required to:

- Adhere to the School's policies and procedures.

- Participate in a comprehensive induction and orientation program, including an understanding of child protection law.
- Never be left alone under any circumstances with a child whilst in Cycle 1 under any circumstance.
- Provide a valid Blue Card clearance details during their engagement at the Service, unless exempt.
- Advise the Approved Provider of any circumstances that may affect their Blue Card status.
- Participate in child protection training as required.
- Not use, or have access to, any personal electronic devices, including mobile phones or smart watches used to take images or video of children in Cycle 1, or around the School where Cycle 1 may be present.
- Report any concern or suspicion that a child is at risk of abuse, harm, neglect or ill-treatment to the Approved Provider (the School), such as the Nominated Supervisor or Principal.
- Immediately report all instances (alleged or witnessed) of child abuse, including assault or sexual abuse (including grooming) to QLD Police within 24 hours.
- Identify and report any concerns around staff, student or volunteer behaviour or conduct to the Principal or Approved Provider of Cycle 1 as soon as practicable.

## Awareness & Implementation

The School will inform staff, students and parents of its processes relating to the health, safety and conduct of staff and students in communications to them[26], these processes will be accessible on the School website and will be available on request from the School administration[27]. Additionally, the annual review will occur in consultation with children, families, staff and management.

The School will ensure it is implementing processes relating to the health, safety and conduct of staff and students by auditing compliance with the processes annually[28].

## Compliance and Monitoring

Suggestions of non-compliance with the School's processes may be submitted as complaints under the School's Complaints Handling Policy and Procedure[29]. Strict adherence to this policy is a condition of employment.

### Managing Breaches & Investigations

A breach is any action or inaction by any individual within the School, including young children and young people that fails to comply with any part of the policy. Breaches may result in disciplinary action, up to and including termination of employment. Where a breach involves a reportable allegation, the School will notify the relevant external authorities (QCT, Police, or QFCC).

If a matter involves a criminal allegation (or reportable conduct), the School will suspend any internal investigation until the Police or Child Safety have concluded their inquiries to ensure chain of evidence is not destroyed or compromised. The Principal will follow directions from Child Safety or Police which may include

[26] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(a)*
[27] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(b)*
[28] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(4)(d)*
[29] *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) s.16(5) and s.16(6)*

removal of the educator or staff member (who is the subject of allegations) immediately from a role with contact with children until authorities conclude their investigation.

If external authorities are not investigating (or have concluded), the Nominated Supervisor and Approved Provider (the School) will investigate breaches in a fair and unbiased manner. This includes;

- Clearly documenting the details of the breach and versions of all parties, and without bias.
- Give the respondent the opportunity to provide their version of events.
- Ensuring confidentiality is maintained throughout the process.
- Reaching a decision based on discussion and consideration of all evidence.

### Outcomes of a Breach

Staff members, visitors or volunteers who fail to adhere to this policy may face termination of their employment or engagement with the School. Depending on the severity of the breach, outcomes may include:

- Increased supervision, mandatory retraining, or mediation between parties (where appropriate).
- Formal warnings or termination of employment/engagement.
- Notification to relevant authorities (QCT, Police, or QFCC) where required by law.
- Reviewing current policies and procedures and developing new ones if necessary.

### Auditing & Reporting

The Principal is responsible for:

- maintaining a Training Compliance Register and reviewing it annually; and
- providing frequent updates to the Board regarding child safety matters and critical incidents.

## Induction & Training

The School will train its staff in processes relating to the health, safety and conduct of staff and students on their induction and will refresh training annually[30].

**Mandatory Induction**

All new staff, volunteers, and Board members must complete child protection induction **before** commencing work. This covers:

- The *Child Protection Act 1999* (Qld) and mandatory reporting obligations.
- The *Code of Conduct* and professional boundaries.
- The specific *Student Protection Contacts (SPCs)* for the School.

**Ongoing Training Program**

The School ensures continued awareness and upskilling through:

1. **Annual Refresher Training:** All staff must complete the annual Independent Schools Queensland (ISQ) child protection training modules (or an equivalent course that satisfies the requirements of the

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

Regulatory Authority for Early Childhood Education and Care, and the Non-State Schools Accreditation Board).

2. **Regular Team Discussions:** Child safety is a standing agenda item at staff meetings to discuss specific scenarios, changes to legislation and checking understanding of child safe policies through quizzes[31].
3. **Community Education:** Periodic communication to the wider School community (parents and students) regarding safety, online risks, and protective behaviours.

## Educating Children About Protective Behaviour

The School implements a protective behaviours curriculum that supports children to understand their rights and identify unsafe situations. This includes educating children on:

- Body safety, such as using correct anatomical names for private body parts and understanding the rules of "inappropriate touch" and personal space.
- About appropriate and inappropriate contact and behaviour in both physical and online environments.
- Distinguishing between safe and unsafe secrets and that there is no secret or story that cannot be shared with someone they trust.
- about their right to feel safe at all times, and to say '*no*' to anything that makes them feel unsafe or uncomfortable.
- about how to use their own knowledge and understanding to feel safe and identify feelings that they do not feel safe.
- help them identify trusted educators, adults and friends.
- that guides and educators are available for them if they have any concerns.
- to tell guides and educators of any suspicious activities or people.
- to recognise and express their feelings verbally and non-verbally.
- that they can choose to change the way they are feeling.

## Resources for Staff Members

There are a range of resources to support staff in their role to protect all students at the School.

- Child Safe Organisations
- Kids Helpline (1800 55 1800)
- Lifeline
- NAPCAN – Prevent Child Abuse & Neglect
- QLD Government – Child Safety Practice Manual
- Raising Children – Safeguarding Children and Child Sexual Abuse

[31] *NQF Safe Culture Guide 2025*

## Policy Release Details

| Date of Policy | Review Schedule | Next Review Due |
|---|---|---|
| February 2026 | Annually | February 2027 |

| | | | |
|---|---|---|---|
| **Version** | V1.4 | **Supersedes** | V1.3 (Main) AND V5.08.25 (Early Years Policy) |
| **Other Related Resources** | Child Protection Guide<br>Child Protection Educational Program Risk Assessment (Early Years)<br>Child Protection Notification Procedure (Early Years)<br>Child Protection Notification Record (Early Years)<br>Child Protection Report Form (Early Years) | | |
| **Change Log** | **Merger:** Consolidated the Early Years (Cycle 1) and Primary School child protection policies into a single, unified dual-sector governance document.<br>**Legislative Alignment:** Updated compliance terminology and references to align with current ACECQA requirements, the 10 Child Safe Standards, and current QLD Blue Card regulations (e.g., Restricted Person Declaration).<br>**Role Clarity & Safeguards:** Clarified distinct responsibilities for the Approved Provider, Staff, and Volunteers, and integrated robust procedural safeguards for managing disclosures, preserving evidence, and procedural fairness. | | |

## Policy Distribution

| Internal Distribution | | |
|---|---|---|
| Internal Use Only | ☐ | |
| Immediate Staff Distribution | ☒ | |
| Staff Training Required | ☒ | |
| Include in Staff Induction Training | ☒ | |
| Staff Manual | ☒ | |
| Intranet | ☒ | |
| **Community Distribution** | | |
| Immediate Parent Distribution | ☒ | |
| Parent Lounge | ☒ | |
| Parent Manual | ☒ | |
| Website | ☒ | |