



Child Protection Program



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PROGRAM OUTLINE

Purpose:	This Child Protection Program is made up of work systems, practices, policies and procedures designed to maintain a safe and supportive school environment and to embed an organisational culture of child safety within the College community.		
Scope:	Arethusa College's Board, Equipping for Life, Officers, Workers, Contractors and Service Providers, Other Persons associated with the college, including students and parents and third-party providers.		
Status:	Approved		
Authorised By:	Board	Date of Authorisation	24 th March 2021
References:	<ul style="list-style-type: none"> • <i>Education (General Provisions) Act 2006 QLD</i> • <i>Child Protection Act 1999</i> • <i>Education (Accreditation of Non-State Schools) Act 2017 QLD and Regulation 2017 QLD</i> • <i>Working with Children (Risk Management and Screening) Act 2000 (Qld) & Regulation 2020 QLD</i> • <i>Education (Queensland College of Teachers) Act 2000 QLD</i> • <i>Criminal Code 1899 (QLD)</i> • <i>Domestic & Family Violence Protection ACT 2012 (QLD)</i> • <i>Civil Liability Act 2003 (QLD)</i> 		
Review Date:	Annually	Next Review Date:	23 rd March 2022
Policy Owner:	Equipping for Life		

ARETHUSA COLLEGE CHILD PROTECTION PROGRAM

Arethusa College has zero tolerance for child abuse and harm and is committed to the protection of all children from all forms of child abuse and harm.

- I. Section 9(1) of the Child Protection Act 1999 (Qld) defines “harm” to a child as “any detrimental effect of a significant nature on the child’s physical, psychological or emotional wellbeing”.
- II. Section 9(2) states that it is immaterial how the harm is caused.
- III. Section 9(3) states that harm can be caused by:
 - a. physical, psychological or emotional abuse or neglect; or
 - b. sexual abuse or exploitation.
- IV. Section 9(4) states that harm can be caused by:
 - a. a single act, omission or circumstance; or
 - b. a series or combination of acts, omissions or circumstances.

This Child Protection Program is made up of work systems, practices, policies and procedures designed to maintain a safe and supportive school environment and to embed an organisational culture of child safety within the College community.

The Program deals specifically with child protection issues and is designed to ensure compliance with the Blue Card System, including the

requirement for a Child and Youth Risk Management Strategy, and related child protection laws. Broader child safety issues arising from our common law duty of care are dealt with through our Student Duty of Care Program.

If you have a belief or suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering, harm or abuse contact **Queensland Police** or **Child Safety Services**.

Where you need guidance on making a report or have questions regarding child safety, contact one of the College's appointed Child Protection Contact Officers.

Whenever there are concerns that a child is in immediate danger the Police should be called on 000.

DEFINITIONS

Our Program Definitions

The legal and regulatory framework for child protection in Queensland is made up of a complex web of laws, regulations and guidance notes. As such, it is necessary to define a number of terms or phrases that are used throughout this Program, to ensure that there is clarity in the College’s child protection policies and procedures.



Child Protection

Arethusa College's Child Protection Program is the College's Child and Youth Risk Management Strategy as required by Blue Card Services. We have

used this naming convention as our Program contains a number of policies, procedures and guidelines that are additional to those required by

Blue Card Services and as such is a more holistic Child Protection Program.

Similarly, where the phrase "**child protection**" is used in our Program it refers to the safety and wellbeing of children and young people and the protection of them from abuse and harm.

Child

A child is defined under the Child Protection Act 1999 (Qld), and for the purposes of our Child Protection Program, to mean an individual under 18 years of age. It is the College's policy that policies and procedures for reporting abuse and harm are extended to consider and include students at the College over the age of 18 years.

The Phrase "Child Abuse"

"Child abuse" is not a defined term in Queensland legislation. However, various sources of legislation provide definitions of concepts and conduct which, together, provide guidance as to what constitutes child abuse in Queensland.

The Child Protection Act 1999 (Qld) states that "harm" to a child can be caused by physical, psychological, or emotional abuse or neglect, or sexual abuse or exploitation. It is immaterial how the harm is caused. The Education (General Provisions) Act 2006 (Qld) provides a definition of "sexual abuse". The Criminal Code Act 1899 (Qld) provides a definition of "grooming". A child can be exposed to "domestic abuse" as defined under the Domestic and Family Violence Protection Act 2012 (Qld). In practice, harm and abuse do not occur in isolation.

For the purposes of this Program, the phrase "child abuse" refers to "harm", "grooming" and exposure to "domestic abuse".

Members of the College Community

Throughout the College's Child Protection Program, certain groups of people in the College community are identified for the purposes of assigning roles, responsibilities and obligations. To ensure clarity, the following terms are used consistently through the Program and have the following meanings:

Board of Directors	The Board of Directors includes all College governors irrespective of their level of interaction with students or College policy.
The Executive Principal	With the exception of where the Executive Principal has specific roles and responsibilities and is therefore expressly identified, the Executive Principal will be included as a " Staff Member " for the purposes of this Program.

<p>Staff Members</p>	<p>This group includes all teaching and non-teaching staff and, unless otherwise stated, the Executive Principal. The term “staff members” includes those employed by the College on a permanent, temporary or casual basis. Where differentiation between teachers and non-teaching staff is required, it will be expressly stated within the policy or procedure itself.</p>
<p>Teachers</p>	<p>Teachers at the College have specific duties and obligations within our Child Protection Program as a result of statutory obligations placed on teachers by the Child Protection Act 1999 (Qld). For the purposes of this Program, a “teacher” is defined in accordance with the Child Protection Act as an approved teacher under the Education (Queensland College of Teachers) Act 2005 (Qld).</p> <p>Where registered teachers have specific duties or obligations under our Child Protection Program, they will be explicitly referred to as "teachers" rather than "staff members".</p>
<p>Direct Contact Volunteers</p>	<p>Direct Contact Volunteers are those volunteers who are involved in providing support, guidance and supervision directly to students and could potentially have direct unsupervised contact with students during the normal course of providing the volunteer service.</p> <p>Direct Contact Volunteers are those who may have:</p> <ul style="list-style-type: none"> • limited supervision by College staff in their role; • significant amounts of 1:1 time with students; • supervisory responsibility for a group of students with only broad and indirect oversight of a College staff member; or • full supervisory responsibility for one or more students, such as in a sport coaching role or learning support role. <p>Examples of Direct Contact Volunteer activities may include volunteers involved in College camps, excursions, sporting teams or assisting in learning activities.</p> <p>Due to the nature of Direct Contact Volunteers’ contact with students, they will have more comprehensive child protection responsibilities and obligations within our Child Protection Program.</p>

OUR CHILD PROTECTION OFFICERS – MAKE A RERPORT

The Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) requires Arethusa College to nominate at least two staff members to whom a student may make a report relating to child protection and safety.

Arethusa College has appointed a number of Child Protection Contact Officers who are available to answer any questions that you may have with respect to our **Statement of Commitment to Child Safety and Wellbeing** and the Child Protection Program.

Our College's Child Protection Contact Officers are listed below:

Lisa Coles	Executive Principal	1300 720 371	Lisa.coles@arethusa.qld.edu.au
Kerry McFarlane	Principal – Spring Hill and Windsor Campus	0401 136 309	Kerry.mcfarlane@arethusa.qld.edu.au
Marian Revermann	Acting Principal – Deception Bay Campus	1300 720 371	Marian.revermann@arethusa.qld.edu.au
Charles Edwards	Chaplain	1300 720 371	Charles.edwards@arethusa.qld.edu.au

Our Child Protection Contact Officers have been appointed as honest, mature, ethical and experienced members of the College community who can deal with sensitive issues relating to child protection and safety.

The College's Child Protection Contact Officers are your first point of contact for reporting child protection issues within the College. They receive special training that allows them to deal with child protection concerns both sensitively and effectively.

Internally reporting child protection concerns, suspicions or beliefs of child abuse, does not discharge staff members' legal mandatory reporting obligations prescribed in this Program under **Procedures for Responding to and Reporting Disclosures and Suspicions of Child Abuse**.

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 may be caused by physical, psychological or emotional abuse or neglect, or sexual abuse or exploitation. It can be caused by a single act, omission or circumstance, or a series or combination of acts, omissions or circumstances.

If you have any concern that a child may be suffering harm as a result of any form of child abuse and have not formed a belief or suspicion on reasonable grounds that the abuse has occurred or is occurring, you should immediately raise your concerns with one of the College's Child Protection Contact Officers. If you form a reasonable belief or suspicion of sexual or physical abuse, you should report your concerns to the Executive Principal or the Chair of the Board of Directors.

Our Senior Child Protection Contact Officer

Arethusa College has appointed **Lisa Coles** as the College's Senior Child Protection Contact Officer (Senior CPCO).

The Senior CPCO is identified in our publicly available **Statement of Commitment to Child Safety and Wellbeing** as the individual the wider community is to initially contact when they have child protection concerns relating to the College.

The Senior CPCO is contactable by phone on **0402 812 247** or by emailing lisa.coles@arethusa.qld.edu.au

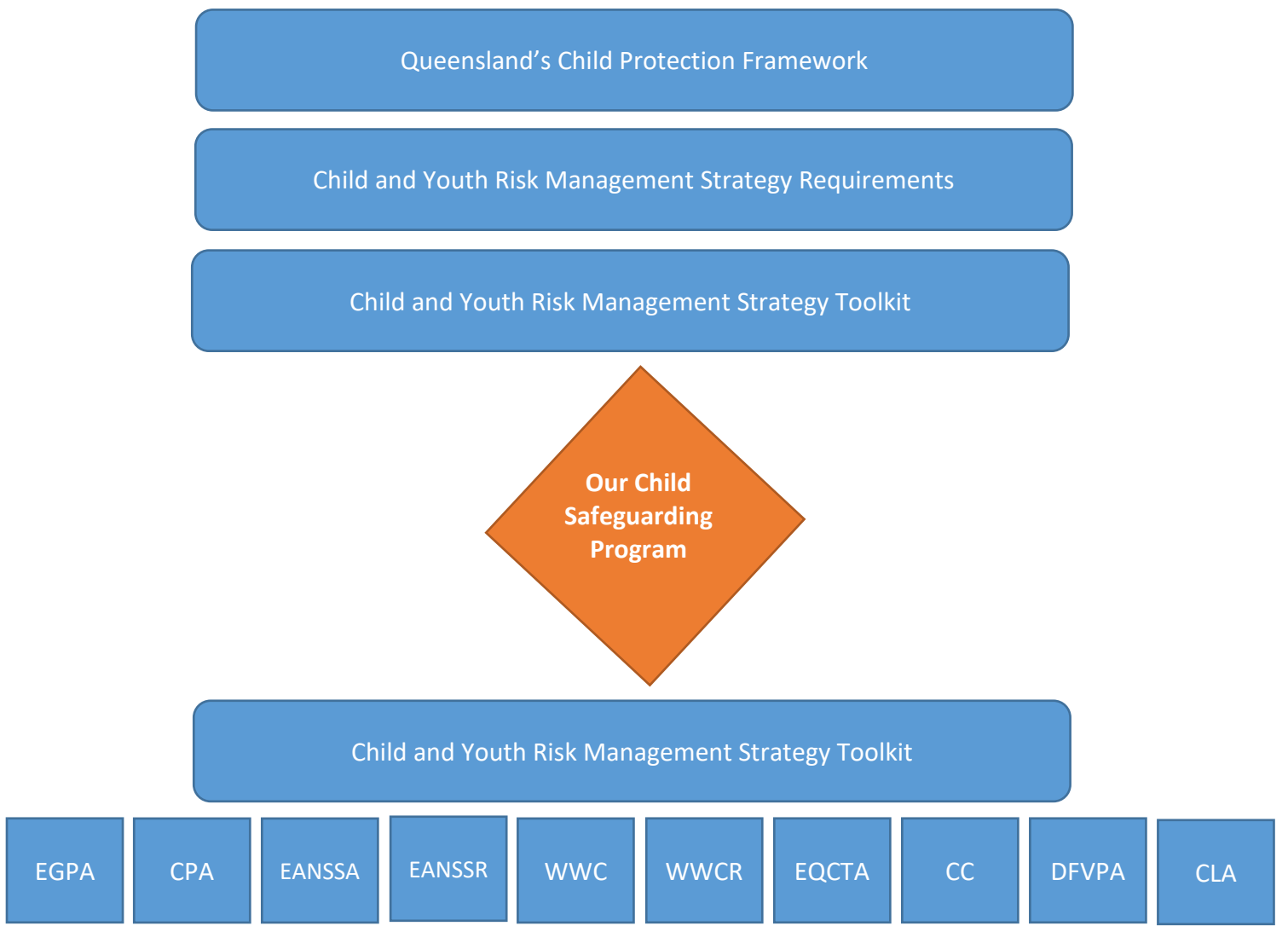
The safety and wellbeing of children and young people is paramount. Whenever there are concerns that a child is in immediate danger the Police should be called on 000.

For more information about our Child Protection Contact Officers' duties and responsibilities, refer to **Child Protection Contact Officers' Responsibilities**.

CHILD PROTECTION LAW AND REGULATION IN QLD (OVERVIEW)

The legal and regulatory framework for child protection in Queensland is made up of a complex web of laws, regulations and guidance notes.

This diagram and the commentary below provide an overview of the framework.



EGPA	Education (General Provisions) Act 2006
CPA	Child Protection Act 1999
EANSSA	Education (Accreditation of Non-State Schools) Act 2017
EANSSR	Education (Accreditation of Non-State Schools) Regulation 2017
WWC	Work with Children (Risk Management and Screening) Act 2000
WWCR	Working with Children (Risk Management and Screening) Regulation 2020
EQCTA	Education (Queensland College of Teachers) Act 2005
CC	Criminal Code 1899
DFVPA	Domestic and Family Violence Protection Act 2012
CLA	Civil Liability Act 2003

Child and Youth Risk Management Strategy

At the top of the diagram are the **Child and Youth Risk Management Strategy** requirements. There are eight (8) requirements which are designed to improve the way all organisations that fall within the scope of the Blue Card System, including schools, identify and minimise the risk of harm to children and young people by contributing to the creation of safe and supportive environments. These requirements are 'principle-based' laws which means that, whilst they have the force of law, how the requirements are applied in practice is open to interpretation and will depend largely on the size, nature and complexity of the organisation that is seeking to comply with the requirements.

To provide a higher level of guidance for organisations, Blue Card Services has published the Child and Youth Risk Management Strategy Toolkit that contains detailed guidance that schools, and other Blue Card organisations, must consider when complying with the Child and Youth Risk Management Strategy requirements.

The next section of our Child Protection Program sets out each of the Child and Youth Risk Management Strategy requirements and how we comply with each requirement at Arethusa College as required by Blue Card Services.

Prescriptive Legal and Regulatory Requirements

At the bottom of the diagram there are **ten separate pieces of legislation** that work together to make up the legal and regulatory framework for child protection in Queensland. They are in summary:

Education (General Provisions) Act 2006 QLD

The Education (General Provisions) Act is primarily an Act about the education of children and the participation of young people in education and training.

Importantly, the Act also establishes various **mandatory reporting obligations** for non-state schools (ss 366 and 366A), including the obligation to:

- report sexual abuse and likely sexual abuse of:
- 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) is being provided with special education at the school and is not enrolled in the
- preparatory year at the school.

Section 366B of the Act also allows for the directors of a non-state school's governing body to delegate, by unanimous resolution, the directors' function to an appropriately qualified individual that is not the Executive Principal or a staff member of the College, for example the directors may choose to delegate this function to a single governing body director, or the Chair.

Child Protection Act 1999 (QLD)

The Child Protection Act is an Act to provide for the protection of children. The main principle for administering the Act is that the safety, wellbeing and best interests of a child are paramount.

The Act defines a 'child', 'harm' and a 'child in need of protection' (Division 1). Relevant to the school context, the Act is also the source of the mandatory reporting obligations for doctors, teachers and registered nurses to report a reasonable suspicion of physical or sexual abuse to Child Safety Services (section 13E). Additionally, the Act also provides for the sharing of information relating to the safety and wellbeing of a child experiencing harm or at risk of harm. (Chapter 5A).

Education (Accreditation of Non-State Schools) Act 2017 (QLD) and Regulation 2017 (QLD)

From a child protection perspective, the key function of the Education (Accreditation of Non-State Schools) Act is to require directors to have a positive exemption notice and Exemption Card before they commence work as a director at the College (section 19).

The Education (Accreditation of Non-State Schools) Regulation 2017 prescribes the accreditation criteria for non-state schools, specifically the child protection policies and procedures required by a school for the purposes of accreditation.

Working with Children (Risk Management and Screening) Act 2000 (QLD) and Regulation 2020 (QLD)

The Working with Children (Risk Management and Screening) Act aims to protect the rights, interests and wellbeing of children and young people in Queensland through a scheme requiring:

- the development and implementation of risk management strategies; and
- the screening of persons employed in particular employment or carrying on particular businesses.

Screening is administered through the Blue Card System. The Act imposes penalties for schools and individuals that do not comply with the Act.

The Act and the Working with Children (Risk Management and Screening) Regulation 2020 are also the source of obligation for a Child and Youth Risk Management Strategy required by Blue Card Services. The Act sets out the requirement to have such a strategy (section 172) while the Regulation

prescribes the matters to be included in the strategy (clause 3). These are the eight requirements discussed above.

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

The Education (Queensland College of Teachers) Act 2005 establishes the Queensland College of Teachers (QCT). The QCT is responsible for the regulation of the teaching profession in Queensland. The Act gives the QCT functions relating to the registration of teachers and related matters such as taking disciplinary action against teachers and monitoring and enforcing compliance with the Act.

Sections 76 and 77 of the Act require schools, as employing authorities, to notify the QCT as soon as practicable after:

- starting to deal with an allegation of harm or likely harm to a child due to a teacher's conduct; and
- stopping dealing with the allegation and the outcome of dealing with the allegation.

Section 78 requires schools to notify the QCT within 14 days of the dismissal of a teacher in circumstances that call into question the teacher's competence to be employed to teach.

Criminal Code 1899 (QLD)

The Criminal Code in Queensland sets out several child protection related offences including those relating to indecent acts and persistent sexual abuse.

Of key relevance to the Queensland child protection framework is the offence of grooming. It is an offence under section 218B of the Code to engage in any conduct with a child under the age of 16 with the intention of facilitating the procurement of the child in a sexual act, or to expose the child to any indecent matter without legitimate reason.

It is also an offence under section 213 of the Code if an owner/occupier of any premises, or a person acting/assisting in the management or control of any premises, induces or knowingly permits any child under the age of 16 to be in or upon the premises, for the purpose of any person treating the child indecently or engaging in a sexual act with the child.

Domestic and Family Violence Protection Act 2012 (QLD)

The Domestic and Family Violence Protection Act is designed to maximise the safety, protection and wellbeing of people who fear or experience domestic violence and forms a key part of the overall legal and regulatory framework for child protection in Queensland. Critically, the Act defines the meaning of a child being "exposed" to domestic violence – a behaviour that can amount to emotional or psychological abuse. If a child is a victim of domestic or family violence, this can also amount to physical abuse.

Civil Liability Act 2003 (QLD)

The Civil Liability Act is the principal legislation governing claims for economic and non-economic loss arising from personal injury and death in Queensland, as a result of negligence or fault. It is through this Act that child abuse victims may claim compensation for loss arising from sexual or serious physical abuse.

Section 33D of the Civil Liability Act imposes a duty of care on the College to take reasonable steps to prevent a person associated with the College from perpetrating sexual or serious physical abuse of a

child under the College's care, supervision, control or authority. If the College is involved in a negligence proceeding under the Civil Liability Act, the College is presumed to have breached its duty of care unless it establishes that it took all reasonable steps to prevent the abuse.

Whether or not the College took all reasonable steps to prevent the abuse will be assessed by a court in accordance with considerations set out in the Civil Liability Act and case law. The effective implementation of the College's risk management strategies in **Child Protection Risk Management** is an example of taking reasonable steps to prevent the abuse of a child.

Our Child Protection Program

In order to comply with Blue Card Services' Child and Youth Risk Management Strategy requirements, as well as each of the nine separate pieces of legislation noted above, Arethusa College has established this Child Protection Program which sets out our work systems, practices, policies and procedures designed to not only ensure compliance, but also to develop a safe and supportive College environment with a child safe culture.

CHILD AND YOUTH RISK MANAGEMENT STRATEGY

The Working with Children (Risk Management and Screening) Regulation 2020 (Qld) sets out eight (8) matters to be included in the College's Child and Youth Risk Management Strategy.

These matters, or minimum requirements, are broken down into four categories:

- **Commitment:** To address a College's commitment to creating a safe and supportive College environment.
- **Capability:** To strengthen a College's capability to provide such an environment.
- **Concerns:** To assist a College to manage any particular concerns with respect to the safety and wellbeing of children and young people who are involved with the College; and
- **Consistency:** To promote the consistency of a College's approach to risk management, both within the College and with respect to compliance with the requirements under the Act.

The eight minimum requirements are as follows:

Commitment

1. A statement about commitment to the safety and wellbeing of children and the protection of children from harm.
2. A code of conduct for interacting with children.

Capability

3. Procedures for recruiting, selecting, training and managing persons engaged or proposed to be engaged by the College, as the procedures relate to the safety and wellbeing of children and the protection of children from harm.

Concerns

4. Policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines.
5. A plan for managing breaches of the risk management strategy.

6. Policies and procedures for compliance with the Act, including: policies and procedures about implementing and reviewing the risk management strategy; and keeping appropriate records.

Consistency

7. Risk management plans for high-risk activities and special events.

8. Strategies for communication and support including: written information for parents and staff about the College’s risk management strategy and where it can be accessed; and training materials for staff relating to the strategy, how to identify risks of harm, and how to handle disclosures and suspicions of harm.

To assist organisations that fall within the scope of the Blue Card System, Blue Card Services has published guidance material titled **Child and Youth Risk Management Strategy Toolkit**.

Arethusa College has established and implemented our Child Protection Program in accordance with Blue Card Services' Child and Youth Risk Management requirements.

The table below sets out each of the requirements with a summary of how we comply with each requirement.

	Short Description	How Arethusa College Applies this Requirement
1.	An overarching statement of commitment to the safety and wellbeing of children and young people, and the protection of children from harm.	<p>Arethusa College has developed and implemented a Statement of Commitment to Child Safety and Wellbeing that describes the key elements of our approach to child protection, safety and wellbeing as well as an overarching set of values and principles guiding the development of policies and procedures to protect children from child abuse and to positively influence our College’s culture.</p> <p>Our Statement of Commitment to Child Safety and Wellbeing is published through various mediums, including our public website.</p>
2.	A code for all persons in the College community interaction with children and young people.	<p>Arethusa College has created a plain English Child Safety Code of Conduct which specifies appropriate standards of behaviour for all persons in the College community towards children and young people in all College environments, including outside of school hours.</p> <p>In addition to our Child Safety Code of Conduct, the College has developed a comprehensive Staff and Student Professional Boundaries policy and a set of Behavioural Guidelines relating to specific aspects of interactions with children and young people.</p>
3.	Written Procedures for recruiting, selecting,	<p>Arethusa College has developed and implemented child safe human resources practices including those relating to:</p> <ul style="list-style-type: none"> • Child Safe Recruitment Practices

	training and managing staff and volunteers.	<ul style="list-style-type: none"> • Blue Cards • Exemption Cards • Child Protection Training • Management of Staff and Volunteers
4.	Policies and procedures for handling disclosures and suspicions of harm, including reporting guidelines.	<p>Arethusa College has established simple and accessible procedures for anyone to report a child abuse concern internally to one of the College's Child Protection Contact Officers.</p> <p>Arethusa College has developed and implemented procedures for Board of Directors, staff members and Direct Contact Volunteers for responding to allegations and disclosures of child abuse or harm, or suspected child abuse or harm, including procedures for support following a disclosure by a student. Refer to our Procedures for Responding to and Reporting Disclosures and Suspicions of Child Abuse.</p> <p>Reporting procedures for Indirect Contact Volunteers, Third Party Contractors, External Education Providers, parents/carers and other community members, including students, are included in our Statement of Commitment to Child Safety and Wellbeing which is available on our public website.</p>
5.	A plan for managing breaches of the College's Child and Youth Risk Management Strategy.	<p>Arethusa College's Child Protection Program functions as the College's Child and Youth Risk Management Strategy.</p> <p>Arethusa College has developed a clear plan for managing breaches of the College's child protection policies and procedures, including our Child Safety Code of Conduct to ensure that appropriate consequences and corrective measures are employed following a breach of the Program. Refer to our Child Protection Program Breach Management Plan.</p>
6.	Plans for managing high risk activities and special events.	<p>Arethusa College has developed and implemented a comprehensive Risk Management Program based on the principles of AS/NZ ISO 31000:2009 Risk Management – Principles and Guidelines.</p> <p>The College has adopted a risk-based approach to child protection, safety and wellbeing. We complete a series of risk assessments in relation to various College activities and special events that may involve heightened risks to student safety and protection, and, as such, would require extra</p>

		planning to ensure appropriate measures are implemented to manage identified risks. Refer to Child Protection Risk Management .
7.	Policies and procedures for managing compliance with the Blue Card System	Arethusa College ensures ongoing compliance with the Blue Card System, including both Blue Card and Exemption Card screening and reporting requirements, and the Child and Youth Risk Management Strategy, through a process of Compliance, Review and Improvement. This process ensures compliance with the College's legal and regulatory obligations and requirements through planned annual reviews of the College's Child Protection Program, as well as a review of the Program following any child protection incident.
8.	Strategies for communication of the College's risk management strategy to, and support of, all stakeholders.	<p>Arethusa College has developed strategies for communication of our Child Protection Program and support. Refer to Communication and Support.</p> <p>This includes strategies to communicate key aspects of the College's Child Protection Program to relevant stakeholders to ensure all members of the College community are aware of their responsibilities and understand what constitutes acceptable behaviour when interacting with children and young people.</p> <p>Arethusa College has also developed strategies to provide support to all members of the College community to enable them to feel comfortable addressing issues of concern, and to reduce the likelihood of breaches of the College's Child Protection Program.</p>

COMPLIANCE WITH QUEENSLAND NON-STATE SCHOOL ACCREDITATION CRITERIA

The Non-State Schools Accreditation Board (NSSAB) requires that all cyclical review reports for the purposes of continued accreditation of Queensland Non-State Schools must specifically address whether the school's child protection policies and procedures are compliant with relevant legal and regulatory requirements.

Sections 15 and 16 of the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) (the Regulations) set out the College's legislative requirements for accreditation in relation to health and safety, responding to harm and the appropriate conduct of staff and students.

In order to assess compliance with the legislative requirements, the NSSAB requires that the College submits a copy of its Child Protection Program with the review report. For ease of review, the College has developed the following table, setting out each requirement in sections 15 and 16 of the

Regulations with a reference to the policy or procedure within our Child Protection Program that meets the requirement.

Section	Requirement	Child Protection Program Reference
15	<p>A school must comply with the requirements of the following legislation that apply to the school:</p> <p>(a) the Work Health and Safety Act 2011 (Qld);</p> <p>(b) the Working with Children (Risk Management and Screening) Act 2000 (Qld).</p>	<p>The College has developed and effectively implemented a comprehensive program to comply with the Work Health and Safety Act 2011 (Qld) and to ensure appropriate processes and procedures for the health, safety and wellbeing of its staff and students. Refer to our <i>Work Health and Safety Program</i>.</p> <p>The College has developed and effectively implemented the following policies which enable the College to comply with the requirements of the Working with Children (Risk Management and Screening) Act 2000 (Qld):</p> <ul style="list-style-type: none"> • Blue Cards • Exemption Cards • Child and Youth Risk Management Strategy
16 (1)	<p>A school must have written processes about:</p> <p>(a) how the school will respond to harm, or allegations of harm, to students under 18 years; and</p> <p>(b) the appropriate conduct of the school's staff and students.</p>	<p>The College has developed and effectively implemented <i>Procedures for Responding to & Reporting Disclosures and Suspicions of Child Abuse</i> which ensure that the College responds effectively and appropriately to allegations of harm to or abuse of students, in accordance with its legislative requirements.</p> <p>To ensure that staff and students engage only in appropriate and child safe behaviour at the College we have developed, implemented and communicated the following conduct guidelines:</p> <ul style="list-style-type: none"> • Child Safety Code of Conduct • Staff and Student Professional Boundaries • Child Protection Behavioural Guidelines • Student Code of Conduct
16 (2)	<p>A school's processes must include:</p> <p>(a) a process for the reporting by a student to a stated staff member of conduct of another staff</p>	<p>The College's <i>Statement of Commitment to Child Safety and Wellbeing</i>, which is available on the College's public website, states that students may report any concerns for their safety or wellbeing to one of our College Child Protection Contact Officers. The details of the College's Child Protection Contact</p>

	<p>member that the student considers is inappropriate.</p> <p>(b) a process for how the information reported to the stated staff member must be dealt with by the stated staff member.</p> <p>(c) a process for reporting:</p> <p style="padding-left: 40px;">(i) sexual abuse or suspected sexual abuse in compliance with the Education (General Provisions) Act 2006 (Qld), section 366; and</p> <p style="padding-left: 40px;">(ii) a suspicion of likely sexual abuse in compliance with the Education (General Provisions) Act 2006 (Qld), section 366A.</p> <p>(d) a process for reporting a reportable suspicion under the Child Protection Act 1999 (Qld), section 13E.</p>	<p>Officers are made available to all staff, students and parents/carers.</p> <p>The College has developed a comprehensive range of pastoral care policies and procedures that are designed to promote the social and emotional wellbeing of students, and to deliver age-appropriate education to all students about:</p> <ul style="list-style-type: none"> • Child abuse awareness and their right to be safe. • their right to make decisions about their body and their privacy. • how they can raise concerns about abuse. • resilience and coping with adversity. • the fact that any concerns they do raise will be taken seriously and responded to appropriately. • our Statement of Commitment to Child Safety and Wellbeing and Child Safety Code of Conduct; and • standards of behaviour for students. <p>Our Pastoral Care Policy includes a process for the reporting by a student to a stated staff member (one of our Child Protection Contact Officers) of conduct of another staff member that the student considers is inappropriate.</p> <p>The College has developed comprehensive guidelines for staff in the Managing Your Initial Response to a Child Protection Incident section of our Child Protection Program. These guidelines include how to initially react to, respond to and report inappropriate conduct or disclosures or allegations of abuse, as well as how to provide support following disclosures.</p> <p>Within the College’s Procedures for Responding to & Reporting Disclosures and Suspicions of Child Abuse, the College has developed, implemented and effectively trained all relevant staff in the following reporting procedures:</p> <ul style="list-style-type: none"> • Mandatory Reporting of Sexual Abuse (including likely sexual abuse); and • Mandatory Reporting of a Reportable Suspicion.
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<p>16 (3)</p>	<p>For the process mentioned in subsection (2)(a), there must be stated at least 2 staff members to whom a student may report the conduct.</p>	<p>The College has nominated a number of senior staff members as Child Protection Contact Officers who are available to discuss any child protection concerns that staff, students or parents/carers may have. Their contact details are listed in the <i>Our Child Protection Contact Officers – Make a Report</i> section at the beginning of our Child Protection Program and are communicated to staff, students and parents/carers through our public website.</p>
<p>16 (4)</p>	<p>The school’s governing body must ensure:</p> <p>(a) the school’s staff and students, and the students’ parents and guardians, are made aware of the processes; and</p> <p>(b) the processes are readily accessible by staff, students, parents and guardians; and</p> <p>(c) staff are trained annually in implementing the processes; and</p> <p>(d) the school is implementing the processes.</p>	<p>The Board of Directors ensures that the following key policies are made readily accessible to staff through the Staff Policy Portal, and to students and parents through the college's Student Portal, Parent Portal and public website:</p> <ul style="list-style-type: none"> • <i>Child Safety Code of Conduct</i> • <i>Staff and Student Professional Boundaries</i> • <i>Child Protection Behavioural Guidelines</i> • <i>Student Code of Conduct</i> • <i>Statement of Commitment to Child Safety and Wellbeing</i> • <i>Child Safety Code of Conduct</i> • <i>Pastoral Care Policy</i> • <i>Managing Your Initial Response to a Child Protection Incident</i> • <i>Mandatory Reporting of Sexual Abuse; and</i> • <i>Mandatory Reporting of a Reportable Suspicion.</i> <p>The Board of Directors ensures that staff, students and parents are made aware of these processes through the methods described in the <i>Communication and Support Policy</i>.</p> <p>The Board of Directors ensures that staff are trained in implementing these processes through the Child Protection Training Policy and Training Programs.</p> <p>The Board of Directors ensures that the College is implementing these processes, and is provided with regular compliance reports, including about the obligations outlined above, through the Compliance Program.</p>

16 (5)	The school must have a written complaints procedure to address allegations of non-compliance with the processes.	The College has developed a Complaints Handling Program to ensure that any child protection-related feedback, comments or complaints from College community members are captured, analysed and acted upon where appropriate.
16 (6)	The complaints procedure may form part of any other written procedure of the school for dealing with complaints.	In accordance with section 16(6) of the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld), our child protection complaints process is part of our general Complaints Handling Program .

DEFINITIONS AND KEY RISK INDICATORS OF ABUSE AND HARM

Child protection is about ensuring the safety and wellbeing of all children and young people, and protecting those who have been harmed, or are at risk of harm.

Under the Child Protection Act 1999 (Qld), a child or young person is in need of protection if they:

- have suffered significant harm, are suffering significant harm, or are at unacceptable risk of suffering significant harm; and
- may not have a parent or carer able and willing to protect them from harm.

Harm to a child is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused.

Harm can be caused by physical, psychological or emotional abuse or neglect, or sexual abuse or exploitation. For more information, refer to:

Harm can be caused by physical, psychological or emotional abuse or neglect, or sexual abuse or exploitation. For more information, refer to:

- **Physical abuse**
- **Psychological or emotional abuse**
- **Neglect**
- **Sexual abuse or exploitation**

Grooming of a child under the age of 16 to engage in a sexual act at a later date is a criminal offence in Queensland.

Arethusa College treats the commission of grooming behaviours on its premises, online, using College equipment or during its extra-curricular activities as conduct which threatens the safety of students and which must be responded to in accordance with our Child Protection Program.

Physical Abuse

Physical abuse occurs when a child or young person has suffered, or is at risk of suffering, non-accidental physical trauma or injury. Physical abuse can include:

- hitting
- shaking
- throwing
- burning
- biting
- poisoning
- domestic or family violence; or
- giving children alcohol, illegal drugs or inappropriate medication.

Physical abuse does not always leave visible marks or injuries. It is not how bad the mark or injury is, but rather the act itself that can cause injury or trauma to the child.

Possible Physical Indicators of Physical Abuse

- unexplained bruises
- bruises or welts on facial areas and other areas of the body, including the back, bottom, legs, arms or inner thighs.
- any bruises or welts in unusual configurations, or those that look like the object used to make the injury, for example, fingerprints, handprints, buckles, iron or teeth.
- burns that show the shape of the object used to make them, such as burns from an iron, grill, cigarette, boiling water, oil or flames.
- fractures of the skull, jaw, nose or limbs, especially those inconsistent with the explanation offered or the type of injury.
- cuts and grazes to the mouth, lips, gums, eye area, ears or external genitalia.
- human bite marks.
- bald patches where hair has been pulled out; or
- multiple injuries, old and new.

Possible Behavioural Indicators of Physical Abuse

- inconsistent or unlikely explanation for an injury.
- inability to remember the cause of an injury.
- fear of specific people.
- wearing clothes unsuitable for weather conditions (such as long-sleeved tops in hot weather) to hide injuries.
- wariness or fear of a parent/carer and reluctance to go home.
- no reaction or little emotion when hurt.
- little or no fear when threatened.
- habitual absences from college without explanations (the parent/carer may be keeping the child away until signs of injury have disappeared).
- overly compliant, shy, withdrawn, passive or uncommunicative.
- fearfulness when other children cry or shout.
- unusually nervous or hyperactive, aggressive, disruptive or destructive to self and/or others.
- excessively friendly with strangers.
- regressive behaviour, such as bed wetting or soiling.
- poor sleeping patterns, fear of dark or nightmares.

- sadness or frequent crying.
- drug or alcohol misuse.
- poor memory and concentration.
- suicide attempts
- academic problems.

Psychological or Emotional Abuse

Emotional or psychological 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
- cultural affronts
- scapegoating; or
- exposure of a child to domestic or family violence.

Possible Physical Indicators of Psychological or Emotional Abuse

- speech disorders
- delays in emotional, mental or physical development; or
- physical signs of self-harming.

Possible Behavioural Indicators of Psychological or Emotional Abuse

- exhibiting low self-esteem
- exhibiting high anxiety
- overly compliant, passive or undemanding behaviour
- extremely demanding, aggressive, or attention-seeking behaviour
- anti-social, destructive behaviour
- low tolerance or frustration
- unexplained mood swings
- self-harming
- behaviours that are not age appropriate, for example, overly adult (parenting of other children), or overly infantile (thumb sucking, rocking,
- bed wetting or soiling)
- fear of failure, overly high standards or excessive neatness
- depression or suicidal thoughts
- running away from home
- violent drawings or writing; or
- being forbidden from contact with other students.

Neglect

Neglect occurs when a child's basic necessities of life are not met, and their health and development are consequently affected. These basic needs include:

- food
- housing
- health care
- adequate clothing
- personal hygiene
- hygienic living conditions
- timely provision of medical treatment; and
- adequate supervision.

Possible Physical Indicators of Neglect

- consistently dirty and unwashed
- consistently inappropriately dressed for weather conditions
- consistently without adequate supervision
- consistently hungry, tired and listless, falling asleep in class, or malnourished
- unattended health problems or lack of routine medical care
- inadequate shelter, including unsafe or unsanitary living conditions
- abandonment by parents; or
- poor hygiene.

Possible Behavioural Indicators of Neglect

- begging or stealing food
- gorging when food is available.
- inability to eat when extremely hungry
- alienated from peers, withdrawn, listless, pale or thin
- aggressive behaviour
- delinquent acts, for example, vandalism or drug or alcohol abuse
- lack of positive interaction with parent/carer
- appearing miserable or irritable
- poor socialising habits
- poor evidence of bonding with others or anxiety towards strangers.
- indiscriminate with affection
- poor, irregular or lack of attendance at school.
- staying at school long hours
- self-destructive
- dropping out of school
- taking on an adult role of caring for a parent
- misusing alcohol or drugs; or
- academic issues.

Sexual Abuse and Exploitation

Sexual abuse or exploitation occurs when an adult, stronger child or adolescent uses their power or authority to involve a child in sexual activity.

Sexual abuse or exploitation can be physical, verbal or emotional and can include:

- kissing or holding a child in a sexual manner
- exposing a sexual body part to a child
- having sexual relations with a child under 16 years of age
- talking in a sexually explicit manner to a child or young person
- making obscene remarks to a child via any form of communication
- persistently intruding on a child's privacy
- showing pornographic films, magazines or photographs to a child
- forcing a child to watch a sexual act; or
- having a child pose in a sexual manner.

Possible Physical Indicators of Sexual Abuse or Exploitation

- injury to the genital or rectal areas, such as bruising or bleeding.
- vaginal or anal bleeding or discharge
- discomfort in urinating or defecating.
- the presence of foreign bodies in the vagina and/or rectum
- inflammation or infection of the genital area
- sexually transmitted diseases
- pregnancy, especially in very young adolescents
- bruising or other injury to the breasts, buttocks or thighs
- anxiety-related illnesses such as anorexia or bulimia; or
- frequent urinary tract infections.

Possible Behavioural Indicators of Sexual Abuse or Exploitation

- the student discloses sexual abuse.
- persistent and age-inappropriate sexual activity, including excessive masturbation, masturbation with objects, rubbing genitals against
- adults, playing games that act out a sexually abusive event.
- drawings or descriptions in stories that are sexually explicit and not age appropriate.
- a fear of home, a specific place or a particular adult, or excessive fear of men or of women
- poor or deteriorating relationships with adults and peers.
- poor self-care/personal hygiene
- regularly arriving early at College and leaving late
- complaining of headaches, stomach pains or nausea without physiological basis
- frequent rocking, sucking or biting.
- sleeping difficulties
- reluctance to participate in physical or recreational activities.
- regressive behaviour, such as bed wetting or speech loss.
- the sudden accumulation of money or gifts
- unplanned absences or running away from home.
- delinquent or aggressive behaviour.
- depression
- self-injurious behaviour, including drug/alcohol abuse, prostitution, self-mutilation, or attempted suicide.
- the sudden decline in academic performance, poor memory and concentration.

- wearing of provocative clothing, or layers of clothes to hide injuries; or
- promiscuity.

Student to Student Offending

If you are concerned that a child (under the age of 18) may have exhibited sexually abusive behaviour, you must report your concern to the College's Child Safety Services' **Regional Intake Service**.

Grooming Behaviour

Grooming behaviour refers to predatory conduct undertaken to prepare a child for sexual activity at a later time. The grooming of a child under 16 is a sexual offence under section 218B of the Criminal Code 1899 (Qld) carrying a maximum penalty of 5 years' imprisonment, or 10 years if the child is aged under 12 years.

The Grooming Offence: 218B

The below is a summary of section 218B of the Criminal Code 1899 (Qld). Legal advice should be obtained if further information is required.

It is a criminal offence if an adult (person aged 18 or above) engages in any conduct in relation to a child under the age of 16 years, or a

person the adult believes is under the age of 16 years, with the intention to:

- facilitate the procurement of the child to engage in a sexual act; or
- expose, without legitimate reason, the child to any indecent matter.

Procure means knowingly entice or recruit for the purposes of sexual exploitation.

Indecent matter includes indecent film, videotape, audiotape, picture, photograph or printed or written material.

Students aged 18 plus at the College are considered to be "adults" under this provision and therefore the College should ensure that those students are made aware of what constitutes grooming under section 218B.

It is a defence to a charge of grooming to prove the adult believed on reasonable grounds that the child was at least 16 years.

Typical Grooming Behaviour

Grooming behaviour typically involves a graduation from attention giving and non-sexual touching to increasingly more intimate and intrusive behaviour.

Grooming does not necessarily involve any sexual activity or even discussion of sexual activity. For example, it may only involve establishing a relationship with a child, a parent or carer for the purpose of facilitating sexual activity at a later time. Grooming behaviour can also occur online on social media sites, instant messaging apps or email.

Certain behaviours or acts will not in isolation constitute grooming behaviour. However, where there is a repeating pattern of indicative behaviour, or several incidents of indicative behaviour, it may constitute grooming behaviour.

Indicators of Adult Grooming Behaviours

- persuading a student or group of students that they have a special relationship with an adult.
- asking a student to keep their relationship with an adult to themselves.
- inappropriately allowing a student to overstep the rules.
- testing boundaries, for example by undressing in front of a child.
- manoeuvring to get or insisting on uninterrupted time alone with a student.
- buying a student gifts.
- insisting on physical affection such as hugging, wrestling or tickling a student.
- being overly interested in the sexual development of a student.
- taking a lot of photos of a student.
- engaging in inappropriate or excessive physical contact with a student.
- sharing alcohol or drugs with a student.
- making inappropriate comments about a student's appearance or engaging in excessive flattery.
- using inappropriate pet names.
- making jokes or innuendo of a sexual nature.
- making obscene gestures or using obscene language.
- sending correspondence of a personal nature via any medium.
- inviting, allowing or encouraging a student to attend a staff member's home without parental/carer permission.
- entering change rooms or toilets occupied by students when supervision is not required or appropriate.
- communicating with a child's parent/stepparent, legal guardian, teacher, religious official or spiritual leader with the intention of facilitating the child's involvement in sexual conduct.
- inappropriately extending a relationship outside of work; or
- photographing, audio recording, or filming students via any medium without having parental/carer consent to do so.

Indicators That a Child May Be Subject to Grooming

- developing an unusually close relationship with an adult.
- displaying significant mood changes, including hyperactive, sensitive, hostile, aggressive, impatient, resentful, anxious, withdrawn or depressed behaviour.
- using 'street' or different language they learned from a new or older 'friend'.
- having new jewellery, clothing, expensive items or large amounts of money that were gifts from a new or older 'friend'.
- using a new mobile phone excessively to make calls, send videos or text messages to a new or older 'friend'.
- being excessively secretive about their use of social media or online communications.
- frequently staying out late or overnight with a new or older 'friend'.
- being dishonest about where they have been or who they were with.
- drug and alcohol use; or
- being picked up in a car by a new or older 'friend' from home or school or 'down the street'.

Indicators That a Child May Be Subject to Online Grooming

- having pornography on their computer or device.
- receiving calls from, or making calls to, unrecognised numbers.
- increasing or excessive amount of time spent online.
- increased secrecy in what they are doing online and efforts to try and hide what they are doing online.
- people on their 'friends' list who are unknown and who they have never met offline.

What is Not Grooming Behaviour

Not all physical contact between a student and a staff member or any person engaged by the College to provide services to children, including a Volunteer, will be inappropriate and/or an indicator of possible grooming behaviour.

The following physical contact with students is not grooming behaviour:

- administration of first aid
- supporting students who have hurt themselves.
- non-intrusive gestures to comfort a student who is experiencing grief, loss or distress, such as a hand on the upper arm or upper back; and
- non-intrusive touching, for example shaking a student's hand or a pat on the back to congratulate a student.

STATEMENT OF COMMITMENT TO CHILD SAFETY AND WELLBEING

Arethusa College has developed the following Statement of Commitment to Child Safety and Wellbeing as an overarching statement that provides the key elements of our approach to protecting children from abuse and sets the tone for the College's entire Child Protection Program.

It is designed to be published on our public website as well as communicated through other mediums such as newsletters, our annual report and induction and welcome packs for Board of Directors, staff members and Direct Contact Volunteers.

A PDF version of Arethusa College's Statement of Commitment to Child Safety and Wellbeing is available [here](#).

The College's Statement of Commitment to Child Safety and Wellbeing has been approved and endorsed by the College's Board of Directors and is regularly reviewed by the Board.

Objectives

This Statement provides the framework for:

- the development of work systems, practices, policies and procedures that promote child protection, safety and wellbeing within the College.
- the creation of a safe and supportive College environment and a positive and robust child protection culture.
- the promotion and open discussion of child protection issues within the College; and
- compliance with all laws, regulations and standards relevant to child protection in Queensland.

Statement of Commitment

Arethusa College is committed to providing education and care to children and young people to assist them to develop into high achieving, supported students, positively connected to each other and to the communities in which they live and which they will serve.

The College is committed to ensuring the safety and wellbeing of all children and young people at the College and is dedicated to protecting them from harm.

At Arethusa College we have zero tolerance for child abuse. Our child protection responsibilities are of the utmost importance for the College and, as such, the College is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations, and to maintain a safe and supportive College environment for all children and young people.

Child Safe Values & Principles

The following child safe values and principles guide the College's commitment to child safety and form the basis for all child protection policies and procedures at the College.

1. All children have the right to be safe.
2. The welfare and best interests of the child are paramount.
3. The views and privacy of the child must be respected.
4. Clear expectations for appropriate behaviour with children are established in our Child Safety Code of Conduct and Staff and Student Professional Boundaries policy.
5. The safety of children is dependent upon the existence of a child safe culture.
6. Child safety awareness is promoted and openly discussed within our College community.
7. Procedures are in place to screen all staff, Direct Contact Volunteers, Third Party Contractors and External Education Providers who have direct contact with children.
8. Child safety and protection is everyone's responsibility.
9. Child protection training is mandatory for all Board of Directors, directors, staff members and Direct Contact Volunteers.
10. Procedures for responding to alleged or suspected incidents of child abuse and harm are simple and accessible for all members of the College community.

Child Protection Contact Officers

As part of our commitment to child protection, safety and wellbeing, Arethusa College has appointed a number of Child Protection Contact Officers as honest, mature, ethical and experienced members of the College community who can deal with sensitive issues relating to child protection and safety.

Our Child Protection Contact Officers are available to answer any questions that you may have with respect to our Statement of Commitment to Child Safety and Wellbeing and the Child Protection Program.

Responsibilities

The College acknowledges that child protection is everyone's responsibility. At Arethusa College all directors of the Board of Directors, staff members and Volunteers have a shared responsibility for

contributing to the safety and protection of children. Specific responsibilities for each group of the College community are further explained in the **'Who is Responsible for Child Protection?'** section of our Child Protection Program.

Reporting Concerns

Our Child Protection Program provides detailed guidance for Directors of the Board of Directors, staff, Volunteers and Third-Party Contractors for identifying key risk indicators of child abuse and how to report child abuse concerns to one of our College's nominated Child Protection Contact Officers. It also contains detailed procedures with respect to the reporting of child abuse incidents to relevant external authorities.

Staff, Volunteers, Third Party Contractors, External Education Providers, students, parents/carers and other community members who have concerns that a child may be subject to abuse are asked to contact one of the College's Child Protection Contact Officers.

Communications will be treated confidentially on a 'need to know basis'. Whenever there are concerns that a child is in immediate danger the Police should be called on 000.

Program Compliance and Review

Arethusa College is committed to the continuous improvement of our Child Protection Program and to ensuring the College's compliance with the Blue Card System. The Program is regularly reviewed for overall effectiveness and to ensure compliance with all child protection related laws, regulations and standards. For more information, refer to the ***Child Protection Compliance, Review and Improvement*** section of our Child Protection Program.

CHILD SAFETY CODE OF CONDUCT

Our Child Safety Code of Conduct clearly outlines the expected standards of behaviour for all stakeholders interacting with children and young people in our College environments, and the consequences of failing to meet the College's expectations.

College environments include both physical and online environments, as well as those outside the College's grounds where College related activities are occurring.

This Code applies to:

- all staff members, including non-teaching staff and temporary or casual staff
- Volunteers
- students
- parents and carers
- Third Party Contractors and External Education Providers
- Board of Directors
- teaching students on placement at the College; and
- visitors.

When individuals are clear about behavioural expectations, they are much more likely to act appropriately with each other and with children.

When everyone is educated about the Child Protection Code of Conduct and the importance of upholding the Code, the College's environments become much more transparent and people are able to be held accountable for their behaviour.

Above all, a Child Safety Code of Conduct helps to protect children from harm.

Our Child Safety Code of Conduct is published on our public website. A PDF version of our Child Safety Code of Conduct is available [here](#).

In addition to our broad expectations for child safe behaviour in all College environments, the College has developed a comprehensive **Staff and Student Professional Boundaries** policy and a set of **Behavioural Guidelines** relating to specific aspects of interactions with children and young people.

Arethusa College Child Safety Code of Conduct

Arethusa College has the following expectations of behaviours and boundaries for all individuals interacting with children and young people within our College community.

Do:

- Uphold Arethusa College's Statement of Commitment to Child Safety and Wellbeing at all times.
- Comply with the College's Staff and Student Professional Boundaries policy, and the Behavioural Guidelines published by the College with respect to child protection.
- Behave as a positive role model to students.
- Promote the protection, safety and wellbeing of students.
- Be vigilant and proactive with regard to student safety and child protection issues.
- Provide age-appropriate supervision for students.
- Treat all students with respect.
- Promote the safety, participation and empowerment of students with a disability.
- Use positive and affirming language towards students.
- Encourage students to 'have a say' and then listen to them with respect.
- Respect cultural, religious and political differences.
- Help provide an open, safe and supportive environment for all students to interact and socialise.
- Intervene when students are engaging in bullying or inappropriate behaviour towards other, for example humiliating or vilifying others.
- Ensure as far as practicable that adults are not left alone with a child.
- Report any breaches of this Child Safety Code of Conduct.
- Report concerns about child safety to one of the College's Child Protection Contact Officers and ensure that your legal obligations to report allegations externally are met.
- Where an allegation of child abuse is made, ensure as quickly as possible that the student involved is safe.
- Call the Police on 000 if you have immediate concerns for a student's safety.
- Respect the privacy of students and their families and only disclose information to people who have a need to know.

Do Not:

- Engage in any form of inappropriate behaviour towards students or expose students to such behaviour.
- Engage in prejudicial or oppressive behaviour or use inappropriate language with students.
- Express personal views on cultures, race or sexuality in the presence of students or discriminate against any student based on culture, race, ethnicity or disability.
- Engage in open discussions of an adult nature in the presence of students.
- Engage in any form of sexual conduct with a student including making sexually suggestive comments and sharing sexually suggestive material.
- Engage in inappropriate or unnecessary physical conduct or behaviours including doing things of a personal nature that a student can do for themselves, such as toileting or changing clothes.
- Engage in any form of physical violence towards a student including inappropriately rough physical play.
- Use physical means or corporal punishment to discipline or control a student.
- Engage in any form of behaviour that has the potential to cause a student serious emotional or psychological harm.
- Use physical means or corporal punishment to discipline or control a student.
- Engage in any form of behaviour that has the potential to cause a student serious emotional or psychological harm.
- Develop 'special relationships' with students that could be seen as favouritism (for example the offering of gifts or special treatment to specific students).
- Engage in undisclosed private meetings with a student who is not your own child.
- Engage in inappropriate personal communications with a student through any medium, including online.
- Take or publish (including online) photos, movies or recordings of a student without parental/carer consent.
- Post online any information about a student that may identify them such as their: full name; age; e-mail address; telephone number; residence; school; or details of a club or group they may attend.
- Ignore or disregard any suspected or disclosed child abuse.

Disciplinary Procedures

Where a staff member breaches the Code, Arethusa College may take disciplinary action, including in the case of serious breaches, summary dismissal. Where any other member of the College community breaches any obligation, duty or responsibility within our Child Safety Code of Conduct, Arethusa College will take appropriate action.

Report Any Concerns

Our Child Protection Program also includes information for staff members, Board Directors and Direct Contact Volunteers on how to identify key risk indicators of child abuse and how to report child abuse concerns to one of the College's Child Protection Contact Officers.

It also contains detailed procedures with respect to the reporting of child abuse incidents to relevant authorities. Indirect Contact Volunteers, Third Party Contractors, External Education Providers,

students, parents/carers and other community members who have concerns that a child may be subject to abuse are asked to contact one of the College's Child Protection Contact Officers.

Communications will be treated confidentially on a 'need to know basis'.

Whenever there are concerns that a child is in immediate danger, the Police should be contacted on 000

STAFF AND STUDENT PROFESSIONAL BOUNDARIES

This policy applies to all teaching staff, non-teaching staff, Board of Directors, Volunteers, Third Party Contractors and External Education Providers (together, known as "staff" for the purposes of this policy only).

Arethusa College staff hold a unique position of influence, authority, trust and power in relation to students at the College. As such, it is their duty, at all times, to maintain professional boundaries with students.

The following policy and guidelines are designed to raise awareness of situations where professional boundary violations may occur and some strategies to minimise the risk of boundary violations.

The practice of protective behaviours at all times will also reduce the possibility of vexatious claims being brought against staff.

Arethusa College Policy

Arethusa College is committed to providing a safe physical and emotional environment where all of our students are respected and treated with dignity in an appropriate, professional and caring manner so that the risk of child abuse is minimised, and a safe and supportive child safe environment is maintained.

It is our policy that:

- staff exercise their responsibilities in a way that recognises professional boundaries with regard to their relationships with students at all times.
- staff identify, discourage and reject any advances of a sexual nature made by a student.
- staff interaction with students is professional at all times, both inside and outside of school hours.
- conflict of interest issues must be reported to the Executive Principal as soon as practicable.
- equal learning opportunities are given to each student without discrimination; and
- appropriate consequences will be applied to staff who breach professional boundaries.

What Are Professional Boundaries?

Professional boundaries are parameters that describe the limits of a relationship in circumstances where one person (a student) entrusts their welfare and safety to another person (a staff member), in circumstances where a power imbalance exists.

The fact that College staff are in a unique position of trust, care, authority and influence with students means that there is always an inherent power imbalance between them. It also means that professional boundaries must be established, maintained and respected at all times.

In most cases this power imbalance is clear, however sometimes it may be more difficult to recognise especially for younger staff members who may only be a few years older than their students.

The following guidelines are not exhaustive and given that sometimes 'grey areas' may occur, it is expected that all staff (no matter their age or experience) use their own good judgment, think very carefully about the implications and potential consequences of engaging in certain behaviours with students, and always err on the side of caution.

When unsure about whether professional boundaries are being, or have been, breached, ask yourself:

- Would I modify my behaviour if a colleague were present?
- How would I feel about explaining my actions at a staff meeting?
- Am I sharing information for the student's benefit, or for my benefit?
- Am I dealing with this student differently from others in similar circumstances?
- Is my language or demeanour different from normal when dealing with this particular student?

Intimate Relationships

Staff must not initiate or develop a relationship with any student that has, or can be interpreted as having, a romantic or sexual, rather than professional, basis. It is not relevant that the relationship may be consensual or condoned by parents/carers.

Such relationships have a negative impact on the teaching and learning of students and colleagues and may carry a serious reputational risk for the staff member and, in turn, the College.

The professional relationship of staff and students may be breached by:

- flirtatious behaviour or dating.
- development of an intimate personal relationship.
- sexual relations.
- the use of sexual innuendo, inappropriate language, or the sharing of inappropriate material with students.
- unwarranted and inappropriate touching.
- unwarranted and inappropriate filming or photography.
- deliberate exposure to sexual behaviour of others (e.g. pornography).
- having intimate contact without a valid context via written or electronic means (e.g. email, letters, telephone, text messages, social media sites or chatrooms).
- going out, whether alone or in company, to social events such as the movies or dinner; and
- exchanging gifts of a personal nature.

Staff should also be aware that developing or encouraging romantic or sexual relationships with recent former students (over 18 years of age) may violate professional boundaries and, as such, they are strongly discouraged from doing so.

The imbalance of power and authority that exists in the staff/student relationship does not suddenly disappear after the student finishes their schooling. Staff should not assume that they will be protected from disciplinary action by claiming that a relationship began only after the student left the College as there may be a reasonable belief that the emotional intimacy of the relationship developed while the staff/student relationship existed.

Personal Relationships

Staff must not initiate or develop a relationship with any student that has, or can be as interpreted having, a personal rather than professional basis. This is regardless of whether the relationship is consensual, non-consensual, or condoned by parents or carers.

It is the student's **perception** of staff behaviour and not the intention of the staff member that is important.

An established and expected professional relationship between staff and students may be compromised by staff:

- attending parties or socialising with students outside of organised College events (without parental/carer permission);
- sharing personal details about their private lives with students; or
- meeting with students outside of school hours without permission from the College.

Staff must recognise at all times that their role is not to be a “friend” or “parent” to a student.

Fair Learning Opportunities

The main focus of teaching is effective student learning and, as such, teachers are expected to support their students with their professional expertise so as to offer them the best education in their individual circumstances. The quality of teaching and learning between teachers and students characterises their relationship.

Teachers should demonstrate their commitment to student learning by:

- maintaining a safe and challenging learning environment that promotes mutual respect.
- recognising and developing each student’s abilities, skills, and talents by catering to their individual abilities and respecting their individual differences.
- encouraging students to develop and reflect on their own values.
- interacting with students without bias.
- not engaging in preferential treatment.
- not discriminating against any student on the basis of race, sex, sexuality, disability or religious or political conviction; and
- always making decisions in students’ best interests.

Electronic Communications Between Staff & Students

It is expected that all staff at the College will adhere to the following guidelines:

- all use of technology should be for educational purposes or for the organisation of co-curricular activities.
- all email communication between staff and students should be via the College email system and reflect a professional staff/student relationship.
- staff should not communicate with students via text message where it is not in a professional context.
- staff should not give out their personal telephone numbers or social media contact details.
- staff are not to accept or request students as 'friends' on social media or otherwise use social media to communicate in any way that is not condoned or approved by the College.

- staff should not exchange personal pictures with a student.
- teachers are not expected or encouraged to respond to concerns of parents/carers or students on holidays, weekends or in the evening; and
- any student personal contact numbers or other personal contact details made available to the College should only be used for College communications.

Physical Contact with Students

All staff should be aware that situations may arise that can be perceived in a manner that was not intended. For this reason, all staff at the College should adhere to the following guidelines for contact with students both in and outside of College grounds:

- staff should avoid unnecessary physical contact with students.
- minimal, non-lingering, non-gratuitous physical contact may be acceptable in the context of the situation (e.g. congratulatory pat on the back or handshake); and
- contact for sport, drama and dance instruction is acceptable in a class situation but not in a 1:1 situation. If physical contact is required for specific technical instructions, it must be brief and only with the consent of the student. Note that a student may withdraw consent for this contact either verbally or gesturally and staff must remain vigilant whilst engaging in necessary contact situations. Once consent has been withdrawn no further contact can be or should be made.

Off-Campus Excursions and Camps

During off-campus excursions or camps, the same physical contact guidelines apply as well as the following:

- checking of sleeping arrangements, or supervising of students changing should be done, where possible, with another staff member present and always in a manner that respects students' privacy and personal space.
- always knock and advise of presence prior to entering a bedroom or dormitory; and
- ensure that while in a bedroom or dormitory a strict staff/student relationship is upheld and that staff do not engage in inappropriate behaviour, such as sitting on a student's bed.

Managing Conflicts of Interest

Where personal relationships with students such as family relationships and close friendship networks exist, questions of conflicts of interest may arise.

This may be more prevalent in close or rural communities where professional boundaries may be tested due to the nature and size of the community. In these circumstances, staff need to be far more diligent in developing and maintaining these boundaries.

Where a staff member feels that a conflict of interest may exist, they should notify the Executive Principal, or the Chair of the Board if the conflict involves the Executive Principal, and arrangements should be implemented to avoid the conflict situation if possible. For example, the teaching of students by a staff member with a conflict should be avoided.

Any significant decisions relating to these students in the College (such as the appointment to classes and selection in sports teams) should be referred to another staff member and endorsed by a supervisor.

Disclosure of Staff/Student Interactions

It is Arethusa College's policy that all staff are encouraged to declare any interactions with students outside school hours. These interactions may include instances where the staff member is:

- related to the student.
- friends with the student's parents/carers or family; or
- given parental/carer consent to interact with the student for academic purposes outside of school hours and has notified the College.

Arethusa College maintains records of all declarations made by staff members relating to their interactions or relationships with students outside school hours or College premises. These records are kept for a period of seven years.

Staff Responsibilities

All staff are to:

- follow the guidelines as set out in this policy.
- immediately report any conflicts of interest; and
- remove themselves from decision making where a conflict has been identified.

Where a staff member breaches this policy Arethusa College may take disciplinary action, including in the case of serious breaches, summary dismissal (where appropriate).

Implementation

These guidelines are implemented through a combination of:

- staff training and development in professional conduct.
- student and parent/carer education and information.
- effective management of teachers engaging in inappropriate relationships with students.
- effective management of conflicts of interest.
- effective communication and incident notification procedures.
- effective record keeping procedures; and
- initiation of corrective actions where necessary.

CHILD PROTECTION BEHAVIOURAL GUIDELINES

In addition to our broad expectations for child safe behaviour in all College environments stated in the College's **Child Safety Code of Conduct**, and the specific professional boundaries guidelines in our **Staff and Student Professional Boundaries** policy, the College has developed the following matrix of policies and guidelines to clearly outline expected standards of child safe behaviour within the College in the specific circumstances.

The **Child and Youth Risk Management Strategy Toolkit** outlines a number of behavioural issues for the College to consider and requires the College to develop policies or guidelines which clearly outline the expected standards of behaviour within the College relating to these issues.

Arethusa College's Child Safety Code of Conduct and Staff and Student Professional Boundaries policy cover many of these issues, however the following behavioural issues require more in-depth and specific guidelines and, as such, the College has developed specific policies to address them.

Behavioural Issue	Guidelines / Policy
Supervision of Children	<ul style="list-style-type: none"> Supervision (General) Policy
Behaviour Management	<ul style="list-style-type: none"> Student Code of Conduct Assault (Student against Student) Truancy Bullying Prevention and Intervention
Transport of Children and Young People	<ul style="list-style-type: none"> Transport Safety Policy
Managing Injuries or Illness	<ul style="list-style-type: none"> Medication Administration First Aid Policy Accident Management Policy
Visitors to the College	<ul style="list-style-type: none"> Visitor Management Policy
Photographs of Students	<ul style="list-style-type: none"> School Photography and Video Policy
Use of Technology and Social Media	<ul style="list-style-type: none"> Information & Communication Technology Policy Cyber Safety Policy Mobile Phones (Student Use Of) Social Media Policy
Smoking, Alcohol Consumption and the use of Medication and Drugs	<ul style="list-style-type: none"> Alcohol (Students) Drugs – Illicit (Student Use Of) Alcohol (Staff) Drugs (Staff) Smoking (Staff)
Organisation Standards	<ul style="list-style-type: none"> Human Resource Management
General Safety	<ul style="list-style-type: none"> Student Duty of Care Program
Confidentiality of Information	<ul style="list-style-type: none"> Child Protection Record Keeping Confidentiality & Privacy

Who Is Responsible for Child Protection?

Child protection is everyone's responsibility.

Society as a whole shares responsibility for promoting the safety, wellbeing and protection of children and young people from harm and abuse.

In the College context, all members of the College community have their role to play – teachers, staff, administrators, parents/carers, Volunteers, Third Party Contractors, External Education Providers, and students. That said, the College's Management Team are committed to 'leading from the front' and engaging in a preventative, proactive and participatory approach to child protection issues.

Key Roles & Responsibilities include:

- Board of Directors
- The Executive Principal
- Child Protection Contact Officers
- Staff Members
- Direct Contact Volunteers
- Indirect Contact Volunteers
- Third Party Contractors
- External Education Providers

Board of Directors Responsibilities

The Board of Directors is required to approve the College's ***Statement of Commitment to Child Safety and Wellbeing*** and to ensure that the Child Protection Program is being effectively implemented.

Each director must:

- acquire and keep up-to-date knowledge of child protection matters relevant to the College.
- have an understanding of the nature of the College's operations and the child protection risks associated with these operations, particularly those identified as high-risk activities and events.
- ensure that the College has appropriate resources to effectively implement its Statement of Commitment to Child Safety and Wellbeing and Child Protection Program.
- ensure that the College has appropriate processes for receiving and considering information regarding child protection issues and is able to respond in a timely way to that information.
- ensure that the College has and implements processes to ensure that the College is complying with its legal and regulatory obligations with respect to child protection; and
- ensure that the College has developed and implemented processes to ensure the ongoing monitoring of resources that have been allocated to the management of child protection issues within the College.

Executive Principal's Responsibilities

The Board of Directors delegates day-to-day management of the College to the Executive Principal.

The Executive Principal is ultimately responsible and accountable for taking all practical measures to ensure that:

- the College effectively implements its ***Statement of Commitment to Child Safety and Wellbeing*** and the Child Protection Program, and effectively deploys all available resources.
- appropriate College Child Protection Contact Officers are appointed and trained.
- a strong and sustainable child protection culture is maintained within the College.

- all child protection incidents and concerns are dealt with professionally and in a timely manner.
- the College's Board receives regular reports with respect to child protection matters.
- organising external support to assist parties following a disclosure or suspicion of harm or abuse; and
- the College is complying with its legal and regulatory obligations with respect to child protection.

Child Protection Contact Officer's Responsibilities

A number of senior staff members are nominated as the College's Child Protection Contact Officers. The names, positions and contact details of all College Child Protection Contact Officers can be found [here](#).

Child Protection Contact Officers are selected based on a number of considerations, namely:

- their personal attitudes, experiences, and beliefs, for example, a person who is non-judgmental, calm and resilient, and demonstrates a high degree of integrity and respect for confidentiality.
- their role within the College, for example, a person who has seniority and experience working with complex student and family issues at the College, and is readily accessible and available to all members of the College community; and
- their personal profile within the College, for example, a person who is approachable, who students and staff trust and who is willing and able to respond to issues personally and sensitively.

Key responsibilities of the College's Child Protection Contact Officers include:

- having a good working knowledge of the College's Child Protection Program.
- being the first point of contact for staff, and other members of the College community, seeking to raise child protection concerns with the College.
- communicating the College's child protection policies and procedures to all stakeholders including students, parents/carers, staff, and Volunteers.
- ensuring that the College's Child Protection Program is being effectively implemented;
- reviewing and managing the College's Child Protection Program, specifically the College's ***Procedures for Responding to and Reporting Disclosures and Suspicions of Child Abuse***.
- inducting and managing the training of new staff members and Direct Contact Volunteers in the College's Child Protection Program, specifically our Procedures for Responding to and Reporting Disclosures and Suspicions of Child Abuse.
- providing all staff members and Volunteers with a copy of the College's ***Statement of Commitment to Child Safety and Wellbeing*** and key contact numbers for reporting child protection concerns.
- promptly managing the College's response to an allegation, disclosure or suspicion of harm or abuse with the assistance of the Executive Principal and senior staff members, and ensuring that the allegation, disclosure, or suspicion is taken seriously.
- offering assistance and support when a member of the College community receives or makes a disclosure of harm or abuse; and

- developing processes for minor corrective issues that do not need to be reported to an outside authority.

In the event that a Child Protection Contact Officer cannot perform their role, for example, due to a conflict of interest or absence, these duties must be performed by another Child Protection Contact Officer, or the Executive Principal.

Our Senior Child Protection Contact Officer

Arethusa College has appointed **Lisa Coles** as the College's Senior Child Protection Contact Officer (Senior CPCO).

The Senior CPCO is identified in our publicly available **Statement of Commitment to Child Safety and Wellbeing** as the individual the wider community is to initially contact when they have child protection concerns relating to the College.

The Senior CPCO is contactable by phone on **0402 812 247** or by emailing lisa.coles@arethusa.qld.edu.au

Staff Responsibilities

All staff members are required to comply with our **Statement of Commitment to Child Safety and Wellbeing**, the College's Child Protection Program, and their legal obligations with respect to the reporting of child harm and abuse.

It is each individual's responsibility to be aware of the risk indicators of harm and abuse, to be observant, and to raise any concerns they may have relating to child abuse with one of the College's Child Protection Contact Officers and/or with external agencies when required.

As a condition of employment at the College, staff must also adhere to the College's **Child Safety Code of Conduct, Staff and Student Professional Boundaries** policy and the College's Child Protection Program.

Direct Contact Volunteers Responsibilities

Direct Contact Volunteers are those volunteers who are involved in providing support, guidance, and supervision directly to students and could potentially have direct, unsupervised contact with students during the normal course of providing the volunteer service.

Direct Contact Volunteers are those who may have:

- limited supervision by College staff in their role;
- significant amounts of 1:1 time with students;
- supervisory responsibility of a group of students with only broad and indirect oversight of a College staff member; or
- full supervisory responsibility for one or more students, such as in a sports coaching role or learning support role.

Examples of Direct Contact Volunteers include volunteers involved in College camps or excursions, coaching sporting teams or assisting in learning activities.

All Direct Contact Volunteers are required to adhere to our **Statement of Commitment to Child Safety and Wellbeing** and our Child Protection Program.

They must also be aware that they too have legal obligations with respect to the reporting of child abuse.

It is each individual's responsibility to be aware of key risk indicators of harm and abuse, to be observant, and to raise any concerns they may have relating to child abuse with one of the College's Child Protection Contact Officers and/or with external agencies where required.

Indirect Contact Volunteers Responsibilities

Indirect Contact Volunteers are those volunteers who are involved in providing support and services whilst not directly assisting a specific group of students.

Indirect Contact Volunteers are not responsible for supervising students and would not have "unsupervised" contact with students during the normal course of providing the volunteer service.

Examples of Indirect Contact Volunteer activities may include assisting with College functions, the College canteen and fundraising or sporting event barbeques.

All Indirect Contact Volunteers are responsible for contributing to the safety and protection of children in the College environment.

All Indirect Contact Volunteers are required by the College to adhere to our ***Statement of Commitment to Child Safety and Wellbeing*** and our ***Child Safety Code of Conduct***.

Third Party Contractor's Responsibilities

All Third Party Contractors engaged by the College are responsible for contributing to the safety and protection of children in the College environment.

Third Party Contractors include, for example, maintenance and building personnel, consultants, casual teachers, tutors, sports coaches, and College cleaners.

They also include music teachers and other extra-curricular teachers and instructors who are engaged by students and their families directly, rather than the College, but have an agreement with the College to use the College's facilities.

In this Child Protection Program, Third Party Contractors are classified as either "Direct Contact Contractors" or "Indirect Contact Contractors".

Direct Contact Contractors are:

- those who have direct unsupervised contact with students during the normal course of their work.
- those who may be in a position to establish a relationship of trust with a student notwithstanding that unsupervised access to students would be rare (for example full-time maintenance personnel); and
- any contractors whom a school is legally required to screen.

Indirect Contact Contractors are those contractors who do not meet the definition of a "Direct Contact Contractor". They are contractors who have no contact with students as part of their role or undertake roles where students are not reasonably expected to be present, e.g. contractors who complete work during school holidays. This type of contractor also includes contractors who are engaged in emergencies where there is insufficient time to undertake relevant child-safety checks.

All Third Party Contractors engaged by the College are required by the College to adhere to our **Statement of Commitment to Child Safety and Wellbeing** and **Child Safety Code of Conduct**, and to be familiar with our Child Protection Program.

Where Third Party Contractors are engaged at short notice, making it impractical to undertake normal screening and/or briefing sessions/procedures, the College should take reasonable steps to ensure the protection of children at the College while the work is being completed.

The College may include this requirement in the written agreement between it and the Third Party Contractor.

External Education Provider's Responsibilities

An External Education Provider is any organisation that the College has arranged to deliver a specified course of study that is part of the curriculum, to a student or students enrolled at the College.

The delivery of such a course may take place on College premises or elsewhere.

All External Education Providers engaged by the College are responsible for contributing to the safety and protection of children in the College environment.

All External Education Providers engaged by the College are required by the College to adhere to our **Statement of Commitment to Child Safety and Wellbeing** and **Child Safety Code of Conduct** and be familiar with our Child Protection Program.

The College may include this requirement in the written agreement between it and the External Education Provider.

Our Child Safe Culture

At Arethusa College we believe that the safety of children is dependent on the existence of a child safe culture within our College community. We have developed the following work systems, practices, policies, and procedures designed to create a child safe culture including:

- a holistic approach to child protection through this **Child Protection Program**.
- the appointment of the College's **Child Protection Contact Officers** and a **Senior Child Protection Contact Officer**.
- establishing key child protection principles in our **Statement of Commitment to Child Safety and Wellbeing**.
- establishing clear expectations for appropriate behaviour with students through our **Child Safety Code of Conduct** and **Staff and Student Professional Boundaries** policy.
- educating our staff and Direct Contact Volunteers through our **Child Protection Training**.
- clear procedures for reporting alleged or suspected incidents of child abuse.
- recognition that children from culturally diverse backgrounds, including Aboriginal and Torres Strait Islander children, have the right to special care and support.
- recognition that children who have any kind of disability have the right to special care and support; and
- clearly defining the roles and responsibilities of personnel involved in protecting children.

CHILD SAFE HUMAN RESOURCES PRACTICES

In addition to ensuring Blue Card screening processes are completed in accordance with our legal obligations, Arethusa College is committed to ensuring that newly recruited and existing staff members, Board of Directors, Direct Contact Volunteers and Third-Party Contractors understand the importance of child safety, are aware of all relevant policies and procedures, and are trained to minimise the risk of child abuse.

This is done through various human resources work systems, practices, policies, and procedures designed to protect children from abuse and harm and create a child safe culture. These include:

- Child Safe Recruitment Practices
- Blue Cards
- Exemption Cards
- Child Protection Training
- Management of Staff and Volunteers (Including Complaints Handling)

Child Safe Recruitment Practices

At Arethusa College we are committed to ensuring that our recruitment practices create a safe environment for our students. To this end, we have established policies and procedures for recruiting staff members, Board of Directors, Direct Contact Volunteers and Third Party Contractors and for assessing their suitability to work with children.

Our recruitment processes are designed to select appropriate staff members, Board of Directors, Direct Contact Volunteers and Third Party Contractors and discourage inappropriate people from working within the College.

Position Descriptions

A position description or duty statement is developed for all staff members and Direct Contact Volunteers whose role at the College involves work with children and young people.

Each position description for staff members involved in child-connected work has a clear statement that sets out the requirements, duties, and responsibilities regarding child protection for those in that role and the occupant's essential qualifications, experience and attributes in relation to child protection.

All applicants for child-connected work at the College are informed about these requirements and the College's child protection practices prior to commencing work at the College.

Duty statements for Direct Contact Volunteers roles are more concise than those for staff members, and include a description of the role, the expectation to provide a safe and supportive environment for children and young people, and to comply with the College **Statement of Commitment to Child Safety and Wellbeing**, **Child Safety Code of Conduct** and **Staff and Student Professional Boundaries** policy.

Pre-Employment Screening

It is our policy that all new staff members, directors of the Board of Directors and Direct Contact Contractors undergo screening including:

- Blue Card screening to assess their eligibility to hold a Blue Card or Exemption Card based on their known past police and disciplinary information.
- personal identity verification and background checking.
- verification of professional or other qualifications relevant to their role.
- an examination of their history of child-connected work; and
- reference checking that addresses the person's suitability for the job and working with children.

Direct Contact Volunteers

With the exception of parents/carers volunteering in an activity that their child is participating in, all of the College's Direct Contact Volunteers undergo the following screening prior to their engagement by the College:

- Blue Card screening.
- personal identity verification and background checking.
- verification of professional and other qualifications if relevant to their role.
- an examination of their history of child-connected work; and
- reference checking that addresses the person's suitability for the job and working with children.

In line with the College's risk-based approach to child protection, safety, and wellbeing, where parent volunteers are volunteering at large offsite activities, such as overnight excursions or camps, the College requires that these parent volunteers undergo Blue Card screening as a matter of best practice.

Interviews

All Board directors, staff members and Direct Contact Volunteers are also subject to rigorous interview procedures.

Probationary Periods

Probationary periods apply to all new staff members and Direct Contact Volunteers to monitor their compliance with the College's child protection policies and procedures.

Reviews

Performance and development reviews are regularly undertaken for all staff and include consideration of performance against the College's Child Safety Code of Conduct and the requirements of the Child Protection Program. For example, ensuring that a staff member has not breached any of the College's reporting procedures or the Child Safety Code of Conduct.

Third Party Contactors

Where a Third Party Contractor will engage in conduct with children as part of providing their services at or for the College they will require a Blue Card. These persons are normally Direct Contact Contractors but, in some cases, may also be Indirect Contact Contractors. Refer to ***Third Party Contractors' Responsibilities*** and ***Blue Cards***.

Child Safe Recruitment and Other Legislation

Our recruitment practices are subject to State and Federal anti-discrimination legislation (see our ***Equal Employment Opportunity and Anti-Discrimination Policy***) and the requirements of the Privacy Act 1988 (Cth) when obtaining, using, disclosing, and storing information from applicants and referees (see our ***Privacy Program***).

Blue and Exemption Cards

Blue Card screening involves national criminal record, and other record, checks, and the assessment of a person's eligibility to work in child related employment or to carry on a child-related business, based on their known past police and disciplinary information.

Arethusa College, our staff, Volunteers, and others have a number of responsibilities and obligations under the Working with Children (Risk Management and Screening) Act 2000 (Qld) (Working with Children Act) and the Working with Children (Risk Management and Screening) Regulation 2020 (Qld) (Working with Children Regulations) which are outlined in this section of our Child Protection Program.

Key Definitions

Employed, employment and employee:

Under the Working with Children Act, a person (an "employee") is "employed" by another person or an organisation, if the person has an agreement with the other person or organisation to carry out work ("employment").

It does not matter:

- whether the agreement is written or unwritten
- whether the work is carried out voluntarily or for financial reward
- what the person's motivation is for carrying out the work
- the time period for which the person is engaged to carry out the work
- whether the agreement provides for the person to carry out work on one occasion or on an ongoing basis, whether regularly or irregularly
- what the nature of the work is.

This means that, for the purposes of our Blue Cards and Exemption Cards policy, all board Directors, staff, Volunteers and Third Party Contractors are considered to be "employees".

Regulated employment

Regulated employment is defined as employment in those categories of work set out in Schedule 1, Part 1 of the Working with Children Act. In the College context, regulated employment includes:

- employment at a school (other than of teachers and parent volunteers) if the usual functions of the employment include or are likely to include:
 - providing services at a school that are directed mainly towards children
 - conducting activities at a school that mainly involve children.
 - Employment in the any of the above is only regulated employment if it meets the frequency test (unless the employee is a contractor).

Frequency Test

People who engage in child-related work are not considered to be in regulated employment, and therefore do not need a Blue Card or Exemption Card, if they work seven days or less in a calendar year.

If the child-related work occurs for more than seven days in a calendar year, then they are considered to be in regulated employment and a Blue Card or Exemption Card is required.

For the frequency test, a 'day' includes a full day or part of a day (e.g. two hours of work on one day is considered to be a day). The frequency test only applies to Volunteers, paid employees and students doing practical placements for their course. There is no frequency test for people who run a regulated business, so Third Party Contractors who provide services that are directed mainly towards, or conduct activities mainly involving, children must have a Blue Card or Exemption Card regardless of how often they work at the College.

Regulated business

A regulated business is defined as a business of a type set out in Schedule 1, Part 2 of the Working with Children Act.

In the context of, and relevant to, the College, regulated businesses include:

- Third Party Contractors who provide health, counselling, and support services to a child:
 - that by their nature, require physical contact or
 - if the person is physically present with the child when no-one else is present or
 - if the person is not physically present with the child (e.g., telephone or online counselling)

Third Party Contractors who provide private teaching, coaching or tutoring to one or more children at the same time Third Party Contractors and External Education Providers who provide educational programs conducted outside of a school, under the Education (General Provisions) Act 2006 (Qld) (except if they are themselves a provider under that Act) religious representatives who provide services or conduct activities directed mainly towards or involving children hostels for children (other than residential facilities) that provide a child accommodation service under funding provided by the Commonwealth or Queensland people who provide 'home stays' for children in their own homes as a business (other than through a government or local council arrangement) directors of non-state school governing bodies.

Disqualified Persons

People whose past behaviour with children indicates that they are not eligible to enter regulated employment are disqualified from even applying for Blue Card screening.

The Working with Children Act states that a person is disqualified if they:

- have been convicted of a disqualifying offence, for example a serious child-related sex offence, child pornography offence or the murder of a child; or

are the subject of:

- reporting obligations under the Child Protection (Offender Reporting) Act 2004 (Qld);
- an offender prohibition order under the Child Protection (Offender Prohibition Order) Act 2008 (Qld);

- a disqualification order issued by a court prohibiting them from applying for or holding a blue card; or
- a sexual offender order under the Dangerous Prisoners (Sexual Offenders) Act 2003 (Qld); or
- are the respondent to an application for an offender prohibition order under the Child Protection (Offender Reporting and Offender Prohibition Order) Act 2004 (Qld).

If a Blue Card or Exemption Card holder is charged with a disqualifying offence or becomes subject to a temporary offender prohibition order or an interim sexual offender order, their Blue Card or Exemption Card will be suspended. If they become a disqualified person, their Blue Card or Exemption Card will be cancelled, and they will instead be issued with a Negative Notice.

It is an offence for a disqualified person to sign a Blue Card or Exemption Card application.

Disqualified persons must also not apply for, start, or continue in regulated employment, and it is an offence for them to do so.

Restricted Person and Restricted Employment

A restricted person means a person who:

- has been issued a Negative Notice.
- has a suspended Blue Card.
- is a disqualified person or
- has been charged with a disqualifying offence which has not been finalised.

Restricted employment means those situations in which a person is exempted from the need to have a Blue Card or Exemption Card. For more information, refer to **Who Does Not Need a Blue Card**.

- A restricted person cannot engage in restricted employment.
- For example, parent volunteers (who would otherwise be exempt from needing a Blue Card) cannot volunteer at the College if they are a restricted person.

Blue Cards

Who Needs a Blue Card?

The Working with Children Act and Regulations require that, subject to the exemptions referred to below, people employed in regulated employment or carrying on regulated business must possess a Blue Card.

People require a Blue Card where their usual function at or their employment by the College (including as a Volunteer or Third Party Contractor) includes, or is likely to include, providing services directed mainly towards, or conducting activities that mainly involve, children.

The Education (Accreditation of Non-State Schools) Act 2017 (Qld) also requires directors of non-state schools to have a current Blue Card or Exemption Card before they can commence work as a director at the College.

Therefore, at Arethusa College, the following people require a Blue Card:

- Directors of the board who are not also teachers or Queensland police officers
- paid staff members (other than teachers)
- Direct Contact Volunteers (other than parents)

- Some Third Party Contractors
- Student teachers
- Teacher aides
- College crossing supervisors.

Who Doesn't Need a Blue Card?

A Blue Card is not legally required if an employee (other than a board Director or Third Party Contractor) does not meet the frequency test.

The following employees also do not need a Blue Card, regardless of how often they work at the College:

- Registered teachers with the Queensland College of Teachers (QCT)**
- Registered health practitioners, including registered nurses***
- Child Volunteers (aged under 18)
- Volunteers who are a parent of a child attending the College.

Staff members with current QCT teacher registration do not require additional screening as registration includes equivalent checks. They may however need to apply for an Exemption Card if they provide other child-related services, in addition to their normal professional duties. For more information, refer to **Exemption Cards**.

Registered health practitioners, such as the College nurse, do not require additional screening as registration includes equivalent checks.

They may however need to apply for a Blue Card if they provide other child-related services, in addition to their normal professional duties.

For example, a nurse who also provides music lessons or supervises after school hours care would require a Blue Card.

Under Queensland law, people who are not legally required to hold a Blue Card cannot apply for one.

Applications for Blue Cards – What is Checked?

The Blue Card check is a national criminal history and other records check that assesses a person's suitability to work with children, based on:

police information:

- any charge or conviction for an offence (even if no conviction was recorded)
- child protection prohibition orders (whether a person is a respondent or subject to an application)
- disqualification orders
- whether a person is subject to reporting obligations under the Child Protection (Offender Reporting) Act 2004 (Qld) or Dangerous Prisoners (Sexual Offenders) Act 2003 (Qld)

investigative information:

- information that the Police Commissioner may provide about police investigations into allegations of serious child-related sexual offences, even if no charges were laid and

disciplinary information:

- information held by certain professional organisations including teachers, childcare providers, foster carers, and certain registered health practitioners.

Outcome of Blue Card Applications

There are three outcomes that can result from a Blue Card application: Withdrawn; a Positive Notice; or a Negative Notice.

Withdrawn:

An application for a Blue Card can be withdrawn by the College at any time before it is decided.

Applications, and/or consent to employment screening, are also deemed to be withdrawn in certain circumstances, such as when the person about whom the application is made does not comply with requests from Blue Card Services for additional information or is charged with a disqualifying offence.

The College cannot employ a person whose application has been or is deemed to have been withdrawn.

Positive Notice:

The application has been approved and a Positive Notice is issued to the person about whom it was made, along with:

- a Paid (P) Blue Card for paid employees or regulated business owners or
- a Volunteer (V) Blue Card for volunteers.

Paid employees and business operators can use their P Blue Cards for all regulated child-related categories, including volunteer work in other organisations (provided that they complete the Link an applicant/cardholder to this organisation form).

Volunteers can use their V Blue Card across all unpaid regulated child-related work categories, including in other organisations (provided that they complete the Link an applicant/cardholder to this organisation form), but not for any paid regulated employment.

Positive Notices and Blue Cards are valid for three years. During this time, Blue Card Services will conduct ongoing monitoring of the card holder's police information and may suspend or cancel the Positive Notice and Blue Card.

Negative Notice:

The application has been refused and a Negative Notice is issued to the person about whom it was made. The person is prohibited from all regulated child-related employment and from carrying on a regulated business. It is an offence for a person with a Negative Notice to apply for, start or continue in regulated employment, or to carry on a regulated business.

If the person believes the Negative Notice was issued based on incorrect or incomplete information, an application can be made to Blue Card Services to have the notice reassessed.

Applications for review of decisions by Blue Card Services to suspend or cancel a Positive Notice/Blue Card, or to issue a Negative Notice, can also be made to the Queensland Civil and Administrative Tribunal (QCAT).

A Negative Notice remains current unless and until it is cancelled.

No Card No Start

Under Queensland's No Card, No Start requirements, prospective College employees (other than those who are exempt) must not commence employment or engagement with the College until they hold a valid Blue Card or receive positive notification that their Blue Card application has been approved.

For continuing employees, applications for renewal of a Blue Card must be submitted before their Blue Card expires. They may continue to work even if their new Blue Card has not been issued before the old one expires. However, if they fail to apply for renewal before the expiry date, they are subject to No Card, No Start and must cease working with children until their new Blue Card has been issued.

How to Apply For or Renew a Blue Card

It is the responsibility of each individual to apply for a Blue Card check and to renew their Blue Card every three years before it expires.

There is no fee for Volunteers or trainee students.

New Staff, Volunteers and Relevant Third-Party Contractors

Employees' Obligations:

Prospective employees who do not already have a Blue Card must apply for and have received their Blue Card prior to commencing their employment or engagement at the College.

Many prospective staff and Volunteers may already hold a Blue Card by reason of their previous or other employment. It is also likely that most Third-Party Contractors who work with children and External Education Providers engaged by the College are carrying on a regulated business within the meaning of the Working with Children Act. As such, they would normally already hold a Blue Card.

Holders of current Blue Cards must complete the Link an applicant/cardholder to this organisation form, prior to commencing in their role, to advise Blue Card Services that they are undertaking child-related activities with a new or additional organisation (the College). The College is also required to complete information on that form.

It is the responsibility of the Blue Card System Manager at the College to complete the form when required.

The College's Obligations:

Where a prospective staff member, board Director, Volunteer or Third-Party Contractor needs a Blue Card to work at the College, the College is responsible for:

- checking the individual's identity documents
- checking the validity of that Blue Card
- notifying Blue Card Services of the employment or proposed employment of the individual prior to the individual commencing work at the College.

The College must not employ or engage, or continue to employ or engage, these employees if they do not have a valid Blue Card.

For more information, refer to ***Blue Cards and Exemption Cards – Additional Obligations of the College.***

Continuing Staff, Volunteers and Third Party Contactors

Employee Obligations:

Blue Cards are valid for three years. It is the responsibility of each individual who holds a Blue Card to apply for its renewal.

Blue Card renewal reminder notices are sent out by Blue Card Services approximately 10 weeks prior to the expiry of the Blue Card.

All employees must submit their renewal application before their Blue Card expires. If they do this, they can continue working while their renewal application is being processed.

Any employee who fails to submit their application for renewal before their expiry date must cease working with children while their renewal application is being processed.

The College's Obligations:

The College will be notified of all relevant updates about the status of Blue Cards for its staff, Volunteers, and relevant Third-Party Contractors, including notices of a suspension or cancellation.

The College has specific obligations if it becomes aware that an employee:

- has been issued with a Negative Notice is a disqualified person or a restricted person, or
- has had their Blue Card cancelled or suspended.

The College must:

- ensure that the employee does not continue to undertake regulated, child-related work within the College. This includes any position on a
- committee or advisory board where the person's decision-making impacts on children within the College environment ensure that appropriate policies and procedures are in place to manage any risks of harm to children and young people if the employee continues to be employed by the College in work that is not child-related.

For more information, refer to ***Blue Cards and Exemption Cards – Additional Obligations of the College.***

Exemption Cards

Who Needs an Exemption Card?

The Working with Children Act and Working with Children Regulations require that registered teachers (individuals who are registered as a teacher with the Queensland College of Teachers (QCT)), and Queensland police officers, who are exempt from holding a Blue Card, must possess an Exemption Card if they are employed in regulated employment (other than as teachers or police officers) or carry on regulated business.

At Arethusa College, this includes:

- Arethusa College teachers who provide other child-related services in addition to their normal professional duties, whether at the College or another organisation**
- Direct Contact Volunteers (other than parents of a student at the College) and Third Party Contractors who are also registered teachers or

- Queensland police officers and board Directors who are also registered teachers or Queensland police officers.

**This may include private tutoring of a child, working in a childcare centre, volunteering at a children's sporting club, or supervising after hours school care.

Who Does Not Need an Exemption Card?

An Exemption Card is not legally required if a registered teacher or police officer is working at the College in the following roles:

- in their professional capacity as a teacher or police officer
- as a non-teaching staff member or Direct Contact Volunteer who does not meet the frequency test
- as a Direct Contact Volunteer who is a parent of a child attending the College.

Application for Exemption Cards: What is Checked?

The Exemption Card check assesses a person's suitability to work with children, based on:

Police information

- any charge or conviction for an offence (even if no conviction was recorded)
- child protection prohibition orders (whether a person is a respondent or subject to an application)
- disqualification orders
- whether a person is subject to reporting obligations under the Child Protection (Offender Reporting) Act 2004 (Qld) or Dangerous Prisoners (Sexual Offenders) Act 2003 (Qld)

For teachers, additional information provided by QCT or, for police officers, additional information provided by the Police Service.

Withdrawn

An application for an Exemption Card can be withdrawn by the applicant at any time before it is decided.

Applications, and/or consent to employment screening, are also deemed to be withdrawn in certain circumstances, such as if the applicant ceases to be a police officer or registered teacher, does not comply with requests from Blue Card Services for additional information or is charged with a disqualifying offence.

The College cannot employ in regulated employment a person whose application has been, or is deemed to have been, withdrawn.

Positive Exemption Notice

The application is approved, and a Positive Exemption Notice and Exemption Card will be issued to the registered teacher or police officer. Blue Card Services will conduct ongoing monitoring of the card holder's police information.

Teachers and police officers can use their Exemption Card for all regulated child-related categories, including paid and volunteer work in other organisations (provided that they complete the Link an applicant/cardholder to this organisation form).

Positive Exemption Notices and Exemption Cards are valid for three years (or until the person stops being a registered teacher or police officer, if earlier).

During this time, Blue Card Services will conduct ongoing monitoring of the card holder's information and may suspend or cancel the Exemption Card.

All relevant updates about the status of the Exemption Card, including notices of suspension or cancellation, will be notified to the College.

Negative Exemption Notice

The application is refused, and the registered teacher or police officer will be issued with a Negative Exemption Notice. The teacher or police officer is prohibited from all regulated child-related employment and from carrying on a regulated business. It is an offence for a person with a Negative Exemption Notice to apply for, start or continue in regulated employment or to carry on a regulated business.

If a teacher or police officer believes a Negative Exemption Notice was issued on the basis of incorrect or incomplete information, an application can be made to Blue Card Services to have the notice reassessed.

Applications for review of decisions by Blue Card Services to suspend or cancel a Positive Exemption Notice and Exemption Card, or to issue a Negative Exemption Notice, can also be made to the Queensland Civil and Administrative Tribunal (QCAT).

A Negative Exemption Notice remains current unless and until it is cancelled.

Starting Work After an Application for an Exemption Card is Made

No Card, No Start does not apply to teachers and police officers who wish to work in other child-related roles. Teachers and police officers who have applied for an Exemption Card can commence other child-related roles as soon as they have lodged their application with Blue Card Services.

How to Apply for or renew an Exemption Card?

It is the responsibility of each individual to apply for an Exemption Card before they commence in a role that requires one, and to renew their Exemption Card every three years before it expires.

There is no fee for Exemption Cards.

What if the Individual already has an Exemption Card?

Individuals who need an Exemption Card for a new role at the College and who already have one must link their current Exemption Card to the College, using the Link an applicant/cardholder to this organisation form before they commence in the new role.

Employing an Individual in a Role that Requires an Exemption Card

The College's Obligations:

Where an individual requires an Exemption Card for their role at the College, the College is responsible for:

- checking the individual's identity documents
- checking the validity of that Exemption Card

- notifying Blue Card Services of the employment or proposed employment of the individual prior to the individual commencing work at the College.

For more information, refer to ***Blue Cards and Exemption Cards – Additional Obligations of the College.***

Exemption Cards and ongoing Employees

Employees' Obligations:

Exemption Cards are valid for three years. It is the responsibility of each individual who holds an Exemption Card to apply for its renewal.

Relevant employees must submit their renewal application before their Exemption Card expires. If they do this, they can continue working in the relevant role while their renewal application is being processed.

Any employee who fails to submit their application for renewal before their expiry date must cease working in the relevant role until they make a new application.

The College's Obligations:

The College will be notified of all relevant updates about the status of Exemption Cards for its employees, including notices of a suspension or cancellation.

The College has specific obligations if it becomes aware that an employee:

- has been issued with a Negative Exemption Notice
- is a disqualified person or a restricted person, or
- has had their Exemption Card cancelled or suspended.

The College must:

- ensure the employee does not continue to undertake regulated, child-related work within the College. This includes any position on a committee or advisory board where the person's decision-making impacts on children within the College environment
- ensure appropriate policies and procedures are in place to manage any risks of harm to children and young people if the employee continues to be employed by the College in work that is not child-related.

For more information, refer to ***Blue Cards and Exemption Cards – Additional Obligations of the College.***

Employment of Arethusa College Teachers in Other Organisations

Teachers at the College who wish to work, whether paid or unpaid, in a child-related role in another organisation need to apply for an Exemption Card or to link a current Exemption Card to the other organisation using the Link an applicant/cardholder to this organisation form.

All relevant updates about the status of the Exemption Card, including notices of suspension or cancellation, will be notified to the other organisation as well as to the College.

Blue Cards & Exemption Cards – Additional Obligations of the College

The College must:

- maintain a Blue Card Employee Register
- add Blue Card holders' details to the Blue Card Employee Register, noting the expiry dates
- check the validity of Blue Cards and Exemption Cards online
- ensure all information relating to Blue Card applications is kept confidential
- advise Blue Card Services if a Blue Card holder ceases employment.

It is the responsibility of the Blue Card System Manager to verify the Blue Card/Exemption Card status of all employees and to advise Blue Card Services of the required changes to employment.

Blue Card/Exemption Card Register

Arethusa College maintains a Blue Card/Exemption Card Register including the following information:

- full name
- date of birth
- employment/engagement start and end dates
- employment type (e.g. paid, Volunteer)
- whether or not the person requires a Blue Card or Exemption Card (and if not, why not – e.g. the parent volunteer exemption applies)
- the date that the Blue Card or Exemption Card application was made or the date the person was linked/delinked to the College
- the date of issue of the Positive Notice/Positive Exemption Notice and the Blue Card/Exemption Card
- type of Blue Card (e.g., 'P' paid or 'V' volunteer)
- Blue Card/Exemption Card number
- expiry date of Blue Card
- renewal date.

Record Keeping

The College maintains records of all child-related employees and Volunteers including:

- the Blue Card/Exemption Card Register
- whether a Negative Notice or Negative Exemption Notice has been issued
- any change in status to a Blue Card (e.g. a change in police information, cancellation or suspension of positive notice and Blue Card)
- where there is a change in police information and the date Blue Card Services was informed of the change
- when an employee leaves the College and the date Blue Card Services was informed
- any change of personal information of an employee and the date Blue Card Services was informed.

Records must always be readily available, should they be required for audit and monitoring purposes.

For more information, refer to ***Compliance with the Blue Card System***.

Penalties

Significant penalties apply for non-compliance with the Working with Children Act, including for the following offences:

- The College employing a Direct Contact Volunteer who does not have a valid Blue Card or Exemption Card or who, if otherwise exempted, is a restricted person.
- The College employing or continuing to employ a disqualified person after having been given notice they are disqualified.
- The College failing to warn an applicant that they must not sign a Blue Card or Exemption Card application if they are a disqualified person.
- Individuals who apply for start or continue in regulated employee without lodging a completed Blue Card application.
- Disqualified persons who apply for start or continue in regulated employment.
- Restricted persons who start or continue in restricted employment.
- Employees who fail to notify Blue Card Services of any changes to personal details within 14 days.
- Teachers or police officers who apply for start or continue to work in regulated employment or carry on a regulated business, where a Negative Exemption Notice has been issued.

A complete list of offences and penalties can be found on the Blue Card website.

Child Protection Training

Arethusa College recognises that without training and education of our staff members, Board directors and Direct Contact Volunteers, our policies and procedures will not operate to effectively keep our students safe and protect them from abuse and harm.

College staff members, Board directors and Direct Contact Volunteers receive child protection training when they first commence their role at the College and are required to complete ongoing training on child protection issues at least annually. Our induction program includes child protection training.

Our Child Protection Training course consists of the following modules:

Module 1 - Child Protection Training Program Overview

Module 2 - The Meaning of Child Abuse and its Key Risk Indicators

Module 3 - The Legal and Regulatory Framework for Child Protection in Queensland

Module 4 - The Child and Youth Risk Management Strategies

Module 5 - Statement of Commitment to Child Safety & Wellbeing and Child Safety Code of Conduct

Module 6 - Responding to a Child Protection Incident Internally

Module 7 - Child Protection Reporting to External Agencies

Module 8 - The Blue Card System

Module 9 - Staff and Student Professional Boundaries

The College's Child Protection Contact Officers, and other selected staff, undertake additional training as considered appropriate to their roles.

Management of Staff and Volunteers

Supervision

All new staff members and Direct Contact Volunteers are supervised regularly to ensure their behaviour towards children is appropriate and to monitor their compliance with the College's child protection policies and procedures.

Professional Development Appraisals

Staff members regularly undertake performance appraisals which include:

- reviewing the skill sets of staff members relating to child protection, safety and wellbeing;
- identifying additional training needs relevant to the staff member's role; and
- setting goals in relation to issues which impact the safety and wellbeing of children and young people. For example, identifying ways to support staff members to perform the duties and skills contained within their job description. This may include setting a target number of hours per week spent on the child protection issues relevant to their role.

Performance Development Reviews

Performance and development reviews are regularly undertaken for all staff and include consideration of performance against the College's **Child Safety Code of Conduct**, the **Staff and Student Professional Boundaries** policy and the requirements of the Child Protection Program.

This includes ensuring that a staff member has not breached any of the College's reporting procedures, the **Child Safety Code of Conduct** or the **Staff and Student Professional Boundaries policy**.

Complaints Management

The College has developed a **Complaints Handling Program** to ensure that any child protection-related feedback, comments or complaints from College community members and relevant stakeholders are captured, analysed, and acted upon where appropriate. This may include feedback about certain staff members or volunteers, or the College's Child Protection Program. In accordance with section 16(6) of the Education (Accreditation

of Non-State Schools) Regulation 2017 (Qld), our child protection complaints process is part of our general **Complaints Handling Program**.

Disciplinary Procedures

Where a staff member breaches any obligation, duty or responsibility within our Child Protection Program, Arethusa College may take disciplinary action, including in the case of serious breaches, summary dismissal.

Where any other member of the College community breaches any obligation, duty or responsibility within our Program, Arethusa College may take appropriate action.

PARTICIPATION AND EMPOWERMENT OF CHILDREN

Children often do not report abuse because they:

- feel uncomfortable doing so;

- do not recognise certain behaviours as abusive or grooming behaviours; or
- do not know how to raise their concerns or make a report.

Arethusa College recognises that in order to achieve a child safe environment at the College which meets students' intellectual, physical, social, emotional, and moral needs, students need to be involved in the creation and maintenance of such an environment.

It is our policy that we have simple and accessible processes in place to assist children (including those from diverse cultural backgrounds and those with a disability) to develop appropriate knowledge and skills to identify and communicate when they do not feel safe.

This is done through various work systems, practices, policies, and procedures. These include:

- Pastoral Care – Child Protection
- Students with a Disability
- Cultural Diversity

Pastoral Care – Child Protection

Pastoral care is the support given to students for their development as a person. It relates to the total care of students and involves tending to both the academic and non-academic needs of students, including their spiritual, emotional, and social wellbeing.

The Pastoral Care Policy includes a process for the reporting by a student to a stated staff member of behaviour or another staff member that the student considers is inappropriate.

Arethusa College is committed to providing a safe, supportive, and social environment where students feel nurtured as they learn.

To this end, we have developed, and continue to develop, a comprehensive range of pastoral care policies and procedures that are designed to promote the social and emotional wellbeing of our students, and to deliver age-appropriate education to all students about:

- Healthy and respectful relationships.
- Child abuse awareness and a child's right to be safe.
- A child's right to make decisions about their body and their privacy.
- How they can raise concerns about abuse.
- Resilience and coping with adversity.
- The fact that any concerns they do raise will be taken seriously and responded to appropriately.
- Our Statement of Commitment to Child Safety and Wellbeing and Child Safety Code of Conduct; and standards of behaviour for students.

We are committed to ensuring that child abuse reporting procedures are age-appropriate, simple, and accessible for all children including children from culturally diverse backgrounds and children with a disability.

Information about these topics, as well as other child safety and wellbeing topics, is made available to all students through various age-appropriate pastoral care initiatives. Child safety and wellbeing topics are also incorporated into the College's curriculum.

Pastoral Care Policy

What is Pastoral Care?

Pastoral care is the support given to students for their development as a person. It relates to the total care of students and involves tending to both the academic and non-academic needs of students including spiritual, emotional, and social wellbeing. The college's role is to encourage excellence, the pursuit of learning and the care of all individual students.

Pastoral care recognises the overriding principle of acting in the best interests of the student.

Our Approach

Arethusa College is committed to providing a safe, supportive, and social environment where students feel nurtured as they learn.

To this end we have developed, and continue to develop, a comprehensive range of pastoral care policies and procedures that are designed to promote the social and emotional wellbeing of our students in areas such as:

- independence
- resilience
- social awareness
- personal responsibility
- healthy living
- healthy minds
- empathy and emotional intelligence; and
- cultural awareness.

Key Pastoral Care Policies and Procedures

Faith:

Arethusa's values acknowledge that we are inspired and empowered by the love of Christ and His Kingdom. That we as an organisation are motivated to do what we do because of what Christ has done for us, and we do it for the outcomes and benefit of the students we serve. Arethusa College is committed to creating a culture where we in practical ways Believe in our students, where we Expect of them and where we Celebrate with them. We do this so that they can become all that they desire to be.

Teaching and Learning:

Quality teaching and learning strategies responsive to the individual learning needs of students are addressed by the college. By engaging students in this way, they are encouraged to become reflective, self-directed learners who accept personal responsibility for their participation in the college.

Student Safety & Welfare:

Arethusa College has implemented a comprehensive Work Health & Safety Program and a Student Duty of Care Program designed to ensure the ongoing safety and welfare of students. Key policies and procedures include those

relating to:

- Child Protection
- Student Supervision
- Managing Student Health
- Managing Student Behaviour
- Students with Special Needs
- Managing Extra-curricular Activities
- Building and Grounds Maintenance and Security; and
- Critical Incident Management.

Students with Disabilities and Special Needs:

Arethusa College has implemented detailed policies and procedures for managing students with disabilities and special needs. Refer to our:

- Disability Discrimination Policy; and
- Special Needs Policy.

Mentoring:

We recognise that students benefit from the advice and experience of their peers. To this end, the college has a *mentoring/peer support* program in place.

Counselling:

Counselling is an important part of a student's development and allows caregivers to address the needs of students on a one-on-one basis.

Students are encouraged to talk to the counsellor, in accordance with our ***Counselling Services Policy***.

Who is Responsible for Pastoral Care?

All teachers and staff at Arethusa College are responsible for pastoral care, and for administering pastoral care in all classes and extra-curricular activities.

In addition we have created College Chaplains who are responsible for ensuring the proper ongoing administration of pastoral care services at the college.

Our Chaplains are:

Title	Name	Contact
Chaplain – Deception Bay	Nick Warren	Nick.warren@arethusa.qld.edu.au
Chaplain – Spring Hill / Windsor	Charles Edwards	Charles.edwards@arethusa.qld.edu.au

Implementation:

Pastoral care within the college is implemented through a combination of:

- Effective policies and procedures.
- Staff training in student welfare, mental health, and spiritual wellbeing.
- Effective incident notification procedures; and
- Allocation of the overall responsibility for the effective implementation of pastoral care to a senior staff member.

Students with a Disability

The College has an obligation to students with a disability to ensure that they are afforded the same level of educational and pastoral care as any other student at the College and considers how each policy and procedure the College establishes and implements may affect students with a disability.

Arethusa College is committed to ensuring that we fulfil our legal obligations including those related to discrimination and disability standards (refer to our **Disability Discrimination Policy**).

The College recognises that students with a disability will not only require additional assistance to participate and engage in College activities in a safe and supportive manner, but also that there are specific child protection risks that arise in relation to students with a disability. This may include, for example, stricter screening procedures and training for staff who assist students who require help with personal activities such as toileting or dressing.

- specific screening and training for staff/Volunteers who will have direct contact with students with a disability.
- written guidelines for staff and Volunteers working with students with a disability.
- express, written permission from the parents/carers of students with a disability where physical contact is required as part of their care; and
- alternative reporting avenues to suit the needs of students with a disability.

Students with a disability at the College may also require varied reporting avenues or systems to students without a disability, and the College has considered this when creating and implementing its ***Procedures for Responding to and Reporting Allegations and Suspicions of Child Abuse***.

When supporting a student with a disability who has been impacted by child abuse, it is critical that the College considers:

- the chronological age, developmental age, and cognitive function of the student in order to tailor developmentally appropriate support strategies; and
- the student's vulnerability to ongoing abuse when considering the need to make a further report and/or implement further risk mitigation strategies.

Cultural Diversity

Children from culturally diverse backgrounds are children who identify as having particular cultural or linguistic affiliations by virtue of their place of birth, ancestry or ethnic origin, religion, preferred language, or language spoken at home, or because of their parents' identification on a similar basis. They include children of Aboriginal or Torres Strait Islander descent who identify as being Aboriginal or Torres Strait Islander.

Arethusa College values and respects the racial and cultural diversity of our students and is committed to ensuring that the backgrounds of all students are sensitively recognised, catered for, celebrated, and valued so that racial and cultural differences do not compromise students' safety and wellbeing.

It is our policy that:

- We identify children from culturally diverse backgrounds when they are enrolled in the College.
- We employ appropriate strategies to ensure the safety of these children as required.
- We encourage participation and empowerment of these children in the development of these strategies.
- We consider these children when developing and implementing policies and procedures related to child protection at the College; and
- We educate our staff about these cultural differences and the strategies and procedures we have employed.

When supporting students from culturally diverse backgrounds, including Aboriginal or Torres Strait Islander students, or those who identify as Aboriginal or Torres Strait Islander, it is critical that the College provides culturally appropriate support. Where possible the College will work with relevant cultural support groups, ensure that the family's privacy is maintained, and engage an interpreter when communicating with the student's family.

Similarly, when supporting international students who have been impacted by abuse, the College will give consideration to appropriate measures to be taken for the welfare of the student, including additional support where appropriate given that the student's family may not be present to provide support within the home environment.

Students from refugee backgrounds who have been impacted by abuse may also be experiencing trauma, dislocation, and loss. Sensitive consideration should be given when determining how to support the student and their family.

PROCEDURE FOR RESPONDING TO AND REPORTING DISCLOSURES AND SUSPICIONS OF CHILD ABUSE

Child abuse can take many forms. The abuser may be a parent, carer, staff member, Volunteer, another adult or even another child.

Unfortunately, the nature of child abuse is complex. The abuse may occur over time and potential risk indicators are often difficult to detect. Even our legal obligations for reporting allegations of child abuse can vary depending on the circumstances of the incident.

The College will take appropriate, prompt action in response to all allegations and disclosures of abuse, neglect and inappropriate behaviour, and other concerns about child protection, by reporting all matters to Child Safety Services or the Police, depending on the allegation or disclosure made.

Arethusa College has established simple and accessible procedures for anyone to report a child abuse concern internally to one of the College's Child Protection Contact Officers.

Arethusa College has developed and implemented procedures for Board directors, staff members, Volunteers and Third Party Contractors for responding to allegations and disclosures of child abuse, or suspected child abuse, including procedures for support following a disclosure by a student.

Reporting procedures for External Education Providers, parents/carers and other community members are also included in our ***Statement of Commitment to Child Safety and Wellbeing*** which is available on our public website.

Age-appropriate reporting procedures for students are developed through our pastoral care program.

This section describes our work systems, practices, policies, and procedures for responding to and reporting allegations of child abuse both internally and externally. These include:

- Managing Your Initial Response to a Child Protection Incident
- Reporting a Child Abuse Concern - An Overview
- Mandatory Reporting of Sexual Abuse
- Mandatory Reporting of a Reportable Suspicion
- Optional Reporting of Harm
- Allegations Against College Stakeholders
- Conduct that is Reportable to the Queensland College of Teachers
- Sharing Information Relating to a Child's Safety or Wellbeing
- Support for Students Interviewed at the College
- Communication with Parents/Carers
- Making Additional Reports
- Confidentiality & Privacy
- Child Protection Record Keeping
- Recording Other Child Protection Actions

Responding to an Emergency

All teaching staff, non-teaching staff, Board directors, Volunteers, Third Party Contractors and External Education Providers must act as soon as they witness a child protection incident or form a reasonable belief that a child has been or is at risk of being abused.

If a child is at immediate risk of harm you must ensure their safety by:

- Separating the alleged victims from others involved
- Administering first aid
- Calling 000 for urgent medical assistance or Police assistance to address immediate health and safety concerns; and
- Nominating one of the College's Child Protection Contact Officers to be the future liaison with Police on the matter.

Managing Your Initial Response to a Child Protection Incident (QLD)

The following sections outline the five ways that you may become aware that a child may be experiencing abuse, strategies for managing each situation, and strategies for supporting and assisting children involved in the disclosure or report.

- Witnessing a Child Protection Incident
- Observation of Risk Indicators
- Private Disclosure by a Child (including Former Students)
- Public Disclosure by a Child
- Third Party Disclosure

- Support Following Disclosure

Witnessing a Child Protection Incident

If you witness an incident where you believe a child has been subject to abuse", you must take immediate action to protect the safety of the child or children involved.

Where there is an immediate risk to the health and/or safety of a child, follow the steps outlined in the **Responding to an Emergency** section of this Program.

The College's **Procedures for Responding to and Reporting Disclosures and Suspicions of Child Abuse** should be followed after the health and safety of the child involved is ensured.

Observations of Risk Indicators

The different types of child abuse and their key risk indicators are set out in detail in the earlier section of this program **Definitions and Key Risk Indicators of Abuse and Harm**.

The process of identifying child abuse purely through observation of risk indicators can be complex and may occur over time. The complexity is magnified by the fact that many of the key risk indicators described may also occur as a result of other factors that are unrelated to child abuse.

If you form a concern that a child may be being abused, you should make written notes of your observations recording both dates and times. You should also report the matter internally to a College Child Protection Contact Officer.

Private Disclosure by a Child

Current Student

If a current student discloses a situation of abuse or harm to you privately, you should stay calm and not display expressions of panic or shock.

You should reassure and support the child. You can do this by:

- stating clearly that the abuse is not the child's fault;
- reassuring the child that you believe them; and
- telling the child that disclosing the matter is the right thing to do.

You should be patient and allow the child to talk at their own pace. When responding you should use the child's language and vocabulary.

Sometimes a student may try to elicit a promise from you that you will not tell anyone about the allegation. You **must not** make this promise, as you are responsible for reporting the matter.

Finally, remember that your role is not to investigate the allegation. You should not interrogate the child and pressure them to tell you more than they want to.

Once a disclosure is made you **must** report the matter internally to a College **Child Protection Contact Officer** as soon as possible. You should also make written notes of the circumstances of the disclosure recording both dates and times.

Following a disclosure of abuse or harm by a student, staff should follow the steps set out in the College's **Support Following Disclosure** policy.

Former Students

If a former student of the College discloses a situation of historical abuse or harm you **must** act. Follow the internal reporting processes first in this Child Protection Program.

If the former student is currently of school age and attending a Queensland school you must follow the external reporting processes in this Child Protection Program.

Public Disclosure by a Child

Public disclosure occurs where you observe a child disclosing abuse to another child or group of children.

In this circumstance you should use a strategy of “protective interrupting”.

The aim of “protective interrupting” is to prevent a child from disclosing details of abuse in front of other children, whilst at the same time providing the child with the opportunity to disclose later, in a safe and confidential manner.

You can do this by:

- asking the child if you can talk privately; and
- moving the child away from other students to a quiet space; and
- following the guidelines with respect to managing a private disclosure.

Following a disclosure of abuse or harm by a student, staff should follow the steps set out in the College's **Support Following Disclosure** policy.

Third Party Disclosure

A third party such as a friend of the child, a relative or another parent may provide you with information relating to child abuse.

In this situation you should:

- listen to the person's concerns seeking clarification where required;
- thank the person for raising their concern;
- advise the person that we have procedures for dealing with situations like this; and
- advise the person that you will discuss their concerns with the relevant authorities.

As with **Private Disclosure**, you should reassure and support the person providing the information.

Sometimes a person may try to elicit a promise from you that you will not tell anyone about the allegation. You **must not** make this promise, as you are responsible for reporting the matter.

Finally, remember that your role is not to investigate the allegation. You should not interrogate the third party and pressure them to tell you more than they want to.

Once a third-party disclosure is made you must report the matter internally to a College **Child Protection Contact Officer** as soon as possible.

Teachers:

Where a teacher receives a third party disclosure, and forms a reasonable suspicion that physical or sexual abuse has occurred, a report must be made to Child Safety Services in accordance with our **Mandatory Reporting of a Reportable Suspicion** policy.

Board Directors, Staff Members (including Teachers) & Volunteers:

Where a Board member, staff member, teacher or Volunteer receives a third party disclosure, and forms a reasonable suspicion or belief that a child has suffered, or is likely to suffer, sexual abuse, a report must be made to the Queensland Police in accordance with our ***Mandatory Reporting of Sexual Abuse*** policy.

You should also make written notes of the circumstances of the disclosure recording both dates and times in accordance with our ***Child Protection Record Keeping*** policy.

Support Following Disclosure

You should take the following steps to support and assist a child after a disclosure of child abuse or harm is made.

The range of measures employed will depend on:

- the degree of severity of the situation
- the risk of harm to the child; and
- the capability and willingness of the parent/carer to protect the child from harm.

After a disclosure is made:

- do not promise the child that you will not tell anyone about the allegation
- reassure the child that telling an adult was the right thing to do
- tell the child what you plan to do next
- do not confront the person believed to be the perpetrator
- report the matter to one of the College's **Child Protection Contact Officers** who will be able to assist you in developing additional support strategies; and
- whenever there are concerns that a child is in immediate danger the Police should be called on 000.

Support for Staff and Volunteers

Witnessing a child protection incident or receiving a disclosure or allegation of abuse can be a stressful experience for staff and Volunteers involved. The College provides support to impacted staff and Volunteers to access necessary support.

Reporting a Child Abuse Concern Internally

Child abuse situations can be very complex, not only from the perspective of ascertaining whether abuse has occurred but also in terms of understanding what steps to take to protect a child.

It is important to remember at all times that the safety and welfare of the child are paramount.

Therefore, if you have any concern that a child may be experiencing abuse and have not formed a belief or suspicion on reasonable grounds that the abuse has occurred or is occurring, you should immediately raise your concerns with one of the College's Child Protection Contact Officers.

If you have formed a reasonable belief or suspicion of sexual or physical abuse you should report your concerns to the Executive Principal or the Chair of the Board of Directors.

The Child Protection Contact Officers will be able to assist you in clarifying your concerns and managing the next steps.

Please note that reporting the matter internally does not release you from other legal and regulatory reporting obligations to report knowledge or suspicion of abuse and harm externally.

In addition, these reporting obligations apply even if the Executive Principal, a Board director, or a Child Protection Contact Officer advises you not to proceed with reporting suspected abuse.

Reporting a Child Abuse Concern Externally

There are three key legal reporting obligations for members of our College. In summary, these are:

Mandatory Reporting

All Board directors, staff members (including teachers) and Volunteers must report reasonable suspicions or knowledge of a child who has been, or is likely to be, sexually abused.

Mandatory Reporting of a Reportable Suspicion

Registered teachers and registered nurses must report reasonable suspicions that a child is suffering, or has suffered, significant harm as a result of physical or sexual abuse and may not have a parent able and willing to protect them from harm.

Optional Reporting of Harm

Any person including board Directors, staff members, Volunteers, Third Party Contractors, External Education Providers, parents/carers, and visitors to the College may make a report if he or she reasonably suspects a child may be “in need of protection” that is – that the child has suffered, is suffering, or is likely to be at risk of suffering, significant harm and does not have a parent able and willing to protect them from harm.

Mandatory Reporting of Sexual Abuse

Source of Obligation and Delegation of the Board’s Reporting Function

Under sections 366 and 366A of the Education (General Provisions) Act 2006 (Qld) (the Act), all College **staff** in Queensland are required by law to report child **sexual abuse** where they become **aware or reasonably suspect** that a:

- student under 18 years attending the College;
- kindergarten age child registered in a kindergarten learning program at the College;
- person with a disability who under section 420(2) is being provided with special education at the College and is not enrolled in the preparatory year at the College, has been or is likely to be sexually abused.

Under section 366B of the Education (General Provisions) Act 2006 (Qld) the Board has, by unanimous resolution, delegated the directors' functions in relation to reporting sexual abuse to an appropriately qualified individual that is not the Executive Principal or a staff member of the College.

Function means the directors' function of receiving a report and giving a copy to a Queensland Police officer.

An 'appropriately qualified individual' is not defined under the Act, however such an individual cannot be the Executive Principal or any other staff member of the College.

The Board has unanimously delegated its reporting function under section 366B of the Act to **Gerry Weatherall, Board Chair**.

The Board understands that if the appointed delegate commits an offence in relation to the reporting obligations under section 366, the Board as the delegator also commits that offence. Accordingly, the delegation of the directors' reporting function has been carefully considered.

What Must be Reported?

Staff members who become aware or reasonably suspect, in the course of their employment, that a child is likely to be sexually abused or has been the subject of sexual abuse, must make a mandatory report.

Definitions

Staff:

Staff means any person employed by the College who normally performs their daily duties within the College in a permanent, temporary, casual, or contractual capacity.

For the purposes of this policy only, staff includes Board directors, staff members, and Direct Contact Volunteers.

Reasonably Suspects:

Reasonably suspects means to suspect on grounds that are reasonable in the circumstances. To reasonably suspect is to form a reasonable suspicion.

A reasonable suspicion involves less than a reasonable belief but more than a possibility. It involves information in your mind that indicates to you that what you suspect may be true.

Likely:

Likely means that, unless someone intervenes, it is more probable than not that the student will be sexually abused.

Sexual Abuse:

Sexual abuse is defined under the Act to include sexual behaviour involving the relevant person and another person in the following circumstances:

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

When Mandatory Reports Must Be Made:

Mandatory reports of child sexual abuse or likely sexual abuse must be made immediately once a reasonable suspicion has been formed.

The earlier a report is received, the earlier steps can be taken to protect a child, where this is necessary.

Students over the age of 18:

Whilst mandatory reporting legislation in Queensland relates only to children under the age of 18 years, for the purposes of this policy, the College extends the meaning to include students attending

the College who are 18 years or above. Therefore, staff at the College have the same reporting obligations regarding to students over the age of 18 years.

How is a Report Made:

Concerns for a child in immediate danger or in a life-threatening situation should be reported to the Police by contacting 000.

Once this report is made, staff should follow the procedures set out below.

Awareness or Reasonable Suspicion of Sexual Abuse or Likely Sexual Abuse

Staff Obligations:

Where a staff member, including a Child Protection Contact Officer, becomes aware, or has a reasonable suspicion, that a child has been sexually abused or is likely to be sexually abused, he or she should immediately give a written report about that abuse or suspected abuse to:

- the Executive Principal; or
- a director of the Board of Directors.

Executive Principal's Obligations:

If the Executive Principal forms such a suspicion, he or she must:

- immediately give the written report about the suspicion to a Police Officer; and
- ensure that such a report is given to a Board director.

Written Reports

Written reports made by staff or the Executive Principal should include the following information:

the name of the person giving the report;

- the student's name and sex;
- details of how the person making the report became aware, or their grounds for reasonably suspecting, that the student has
- been sexually abused or is likely to be sexually abused by another person;
- details of the abuse or suspected abuse (unnecessary for reports of likely sexual abuse);
- any of the following information of which you are aware:
 - the student's age;
 - the identity of the person who has sexually abused the student, is suspected to have sexually abused the student, or is suspected to be likely to sexually abuse the student; and
 - the identity of anyone else who may have information about the abuse, suspected abuse, or suspected likelihood of abuse.

Reporting to Authorities

Executive Principal and Board of Directors Obligations

If the Executive Principal or a Board director receives such a report, he or she must:

- Immediately report the incident to the nearest Queensland Police Service District Child Protection & Investigation Unit (CPIU); and

- after contacting the Police, forward the written mandatory reports to the Police.

Where a report of sexual abuse or likely sexual abuse also involves a reportable suspicion, you must also make a report of the reportable suspicion.

Refer to ***Mandatory Reporting of a Reportable Suspicion***.

What if I Do not Have a Reasonable Suspicion of Sexual Abuse or Likely Sexual Abuse?

If you do not have a reasonable suspicion, you must:

- follow the internal reporting procedures set out in the Child Protection Program including reporting the matter to a College Child Protection Contact Officer and keeping records of observations;

and you **may**:

- make an optional report following our ***Optional Reporting of Harm*** guidelines; and
- refer the case to the Executive Principal who may contact a support service.

Only the Executive Principal may make a referral to a support service without the student's or parent's/carer's consent.

Staff, Volunteer & Others Misconduct

Where a matter that is subject to mandatory reporting also involves an allegation against a staff member or any person engaged by the College to provide services to students, including Volunteers, refer to our ***Allegations Against College Stakeholders*** policy.

What Happens after a Report is Made?

Upon receiving a report, the Police will complete an investigation and assessment to determine whether the child is in need of protection.

A Police Officer may take a child who the officer reasonably believes is at immediate risk of harm into custody. They may also:

- Arrange for the medical examination or medical treatment of the child if it is reasonable in the circumstances.
- Enter the premises or residence in which they reasonably believe the child or young person to be.
- Search for the child in those premises; and/or
- Remain within those premises for as long as they reasonably consider it necessary to find the child.

Mandatory reporters can contact the Police, or Child Safety Services where involved, to request details of the outcome and the proposed action of the report. Information will be shared where possible, after taking into account any legal restrictions or other relevant considerations (such as the status of the investigation).

Mandatory Reporting of a Reportable Suspicion

Source of Obligation

Under section 13E of the Child Protection Act 1999 (Qld) all doctors, teachers and registered nurses in non-state schools are required by law to report a reportable suspicion about a child to Child Safety Services.

What Must Be Reported?

Teachers and registered nurses who form a reportable suspicion about a child must make a written report to Child Safety Services.

Incidents involving sexual abuse must also be reported in accordance with the College's **Mandatory Reporting of Sexual Abuse** procedures.

Who Must Report?

All teachers and registered nurses are required to report a reportable suspicion to Child Safety Services.

If a staff member, including a teacher or registered nurse, does not have a reportable suspicion, but considers that the child is likely to become a child in need of protection if no preventative support is given, he or she may make a report in accordance with the College's **Optional Reporting of Harm** guidelines.

What is a Reportable Suspicion?

A 'reportable suspicion' about a child has two parts. It is a reasonable suspicion that the 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 the harm.

A reportable suspicion may be formed over a period of time, or as an outcome of consultation with colleagues. These terms are further explained below.

Students Over the Age of 18

Whilst mandatory reporting legislation in Queensland relates only to children under the age of 18 years, for the purposes of this policy, the College extends the meaning to include students attending the College who are 18 years or above.

Therefore, if a teacher or registered nurse has reasonable suspicions that a student aged 18 years or older has suffered, is suffering or is at an unacceptable risk of suffering, significant harm caused by physical or sexual abuse are to be reported to the Queensland Police.

Definitions

Harm:

Harm is defined in the Child Protection Act 1999 (Qld) 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 physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. It can be caused by a single act, omission or circumstance, or a series or combination of acts, omissions, or circumstances.

May Not Have A Parent Willing and Able to Protect the Child from Harm:

According to Child Safety Services' guidance, a parent who 'may not be able and willing' includes a parent who wants to protect their child from harm but lacks the means to.

It also includes a parent who has the means to protect their child from harm but does not want to.

A parent may be rendered 'not able and willing' for many reasons. For example:

- The parent does not, or refuses to recognise that harm is occurring
- The parent or child may be subject to domestic violence; and
- The parent's partner may be abusive or harmful to the child.

For the purposes of this policy, "parent" includes a child's carer or legal guardian.

Reasonable Suspicion:

A reasonable suspicion involves less than a reasonable belief but more than a possibility. It involves information in your mind that indicates to you that what you suspect may be true. It is a suspicion on grounds that are reasonable in the circumstances.

The considerations you may consider in determining whether you have a reasonable suspicion include:

- whether there are detrimental effects on the child's body or the child's psychological or emotional state that:
 - are evident to you; or
 - that you consider are likely to become evident in the future; and
- in relation to any detrimental effects mentioned above:
 - their nature and severity; and
 - the likelihood they will continue; and
- the child's age.

Your consideration may be informed by:

- your observation of the child;
- other knowledge about the child; or
- any other relevant knowledge, training, or experience that you may have.

Conferring with Colleagues

Section 13H of the Child Protection Act 1999 (Qld) permits you to confer with, consult with, and share information with a colleague (that is, another person working at or for Arethusa College) for the purposes of:

- Forming a suspicion as to whether a child has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse.
- Forming a suspicion about whether a child has a parent able and willing to protect the child from the harm.

- Making a report of a reportable suspicion; and
- That colleague taking appropriate action to deal with suspected harm or risk of harm to a child.

For example, you may confer with the College's Child Protection Contact Officers or the Executive Principal about a reportable suspicion. Our Child Protection Contact Officers may then advise you to take appropriate action under mandatory reporting obligations.

When Mandatory Reports Must Be Made?

Mandatory reports of a reportable suspicion must be made without delay once a reasonable suspicion has been formed. This must be done regardless of any other action you take in relation to the child.

You are responsible for reporting a reasonable suspicion, not investigating it.

How is a Report Made?

Concerns for a child in immediate danger or in a life-threatening situation should be reported to the Queensland Police Service by immediately contacting 000.

Once this report is made, staff should follow the procedures set out below.

Determination of a Reportable Suspicion:

Mandatory Reporters are directly responsible for reporting a reportable suspicion to Child Safety Services.

A teacher may confer with the Executive Principal, who may make a Mandatory Report. A teacher is not required to make an additional mandatory report if he or she knows, or reasonably supposes, that Child Safety Services is aware of the matter.

Mandatory Reporters must give a report that:

- states the basis on which you have formed the reportable suspicion; and
- includes the information prescribed by regulation, to the extent of your knowledge. This includes:
 - a) the child's name and sex
 - b) the child's age
 - c) details of how to contact the child (e.g. home address)
 - 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
 - f) particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates.

You are only required to include information that you are aware of or have knowledge about. You can form a reportable suspicion without knowing all the details you are required to report. You are not required to undertake an investigation in order to be able to include all of the particulars in the report.

You are not required to give a report about a matter if:

- giving the report might incriminate you; or

- you know, or reasonably suppose, that Child Safety Services is aware of the matter.

Contacting Child Safety Services

A report can be made online or by telephone, by using the contact details below:

- Child Safety Services can be contacted during business hours on the numbers listed on the Regional Intake Service website.
- Outside of business hours, contact the Child Safety After Hours Service Centre on 07 3235 9999 or 1800 177 135.
- If you are unsure who to contact, contact the Child Safety Services' Enquiries Unit on 07 3224 8045 or 1800 811 810.

What if I do not have a Reportable Suspicion?

If you do not have a reasonable suspicion, you **must**:

- Follow the procedures set out in the Child Protection Program including reporting the matter to a College Child Protection Contact Officer and keeping records of observations;

and you **may**:

- Make an optional report following our **Optional Reporting of Harm** guidelines; and
- Refer the case to the Executive Principal who may contact a support service.

Only the Executive Principal may make a referral to a support service without the student's consent.

Staff, Volunteer & Others Misconduct

Where a matter that is subject to mandatory reporting also involves an allegation against a staff member or any person engaged by the College refer to the College's **Allegations Against College Stakeholders** procedures.

What Happens after a Report is Made?

Upon receiving a report, Child Safety Services will complete an investigation and assessment to determine whether the child is in need of protection. Refer to the Community Services website.

- A Child Safety Services Officer may take a child who the officer reasonably believes is at immediate risk of harm into custody. They may also:
- Arrange for the medical examination or medical treatment of the child if it is reasonable in the circumstances.
- Enter the premises or residence in which they reasonably believe the child or young person to be.
- Search for the child in those premises; and/or
- Remain within those premises for as long as they reasonably consider it necessary to find the child.

Mandatory reporters can contact Child Safety Services to request details of the outcome and the proposed action of the report. Information will be shared where possible, after taking into account any legal restrictions or other relevant considerations (such as the status of the investigation).

Optional Reporting of Harm

This policy deals with optional reporting obligations. You should make an optional report of harm only if you do not have an obligation to report under the:

- **Mandatory Reporting of a Reportable Suspicion;** and/or
- **Mandatory Reporting of Sexual Abuse.**

Source of Obligation

Under section 13A of the Child Protection Act 1999 (Qld) any person (including College staff members) may make a report if he or she reasonably suspects that a child may be in need of protection.

Section 10 of the Child Protection Act 1999 defines 'a child in need of protection' as 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.

What is Reasonable Suspicion?

A reasonable suspicion involves less than a reasonable belief but more than a possibility. It involves information in your mind that indicates to you that what you suspect may be true. It is a suspicion on grounds that are reasonable in the circumstances.

The considerations you may consider in determining whether you have a reasonable suspicion include:

- Whether there are detrimental effects on the child's body or the child's psychological or emotional state that:
 - are evident to you; or
 - that you consider are likely to become evident in the future;
- In relation to any detrimental effects mentioned above:
 - their nature and severity; and
 - the likelihood they will continue; and
- the child's age.

Your consideration may be informed by:

- The child telling you they have been harmed.
- A third party telling you about likely or actual harm to the child.
- Your observation of the child.
- Other knowledge about the child; or
- Any other relevant knowledge, training, or experience that you may have.

How is a Report Made?

Concerns for a child in immediate danger or in a life-threatening situation should be reported to the Police by contacting 000.

Once this report is made, staff should follow the procedures set out below.

Contacting Child Safety Services:

Once you have determined that you have a reasonable suspicion, you must make a report to Child Safety Services.

A report can be made online or by telephone, by the contact details below:

- Child Safety Services can be contacted during business hours on the numbers listed on the Regional Intake Service website.
- Outside of business hours, contact the Child Safety After Hours Service Centre on 07 3235 9999 or 1800 177 135.
- If you are unsure who to contact, contact the Child Safety Services' Enquiries Unit on 07 3224 8045 or 1800 811 810.

Contacting a Queensland Police Service District Child Protection & Investigation Unit (CPIU):

If you do not have a reasonable suspicion about the safety of a child, you may also report the incident to the nearest Queensland Police Service District Child Protection & Investigation Unit (CPIU).

A case may also be reported to the CPIU where:

- A possible criminal offence is suspected within the family (e.g. physical abuse, domestic violence);
- There is evidence that the student does not have a parent willing and able to protect them; and
- There is evidence that other children may have been harmed or are likely to be harmed.

After contacting the Police, written compulsory reports must be forwarded to them. Contact Policelink on 131 444 if you are unable to contact a CPIU.

Support Services

If you do not have a reportable suspicion about a child, and you do not reasonably suspect that they are in need of protection, you may confer with a College Child Protection Contact Officer, who can advise you and refer the case to the Executive Principal if referral to a support service is appropriate.

Only the Executive Principal may make a referral to a support service without the student's consent.

Staff, Volunteer & Others Misconduct

Where a matter that is subject to optional reporting also involves an allegation against a staff member or any person engaged by the College to provide services to students, including volunteers, refer to our ***Allegations Against College Stakeholders*** guidelines.

What Happens after a Report is Made?

Upon receiving a report, Child Safety Services will complete an investigation and assessment to determine whether the child is in need of protection. Refer to the Community Services website.

A Child Safety Services Officer or a Police Officer may take a child who they reasonably believe is at immediate risk of harm into custody. They may also:

- Arrange for the medical examination or medical treatment of the child if it is reasonable in the circumstances.
- Enter the premises or residence in which they reasonably believe the child or young person to be.

- Search for the child in those premises; and/or
- Remain within the premises for as long as they reasonably consider it necessary to find the child.

Mandatory reporters can contact Child Safety Services to request details of the outcome and the proposed action of the report. Information will be shared where possible, after taking into account any legal restrictions or other relevant considerations (such as the status of the investigation).

Allegations Against College Stakeholders

Allegations of Suspicions of Child Abuse Involving Staff

The College has developed specific guidelines for reporting and responding to allegations or suspicions of child abuse or harm that are made against, or involving, Board directors, the Executive Principal, staff members, Volunteers, Third Party Contractors or External Education Providers – collectively “staff members” for the purpose of these guidelines.

Following these guidelines for responding to and reporting allegations involving staff does not discharge your legal obligations to report abuse or harm, namely the obligations to make:

- A Mandatory Report of Sexual Abuse.
- A Mandatory Report of a Reportable Suspicion; and
- An Optional Report of Harm.

What is Reportable Conduct?

Reportable conduct for the purposes of these guidelines includes staff member conduct that has been identified as having the potential to cause harm to students. This includes:

- **Physical boundary violations:** where a staff member fails to respect and respond appropriately to the physical needs of students, for example using force to ensure a child cooperates or holding or restraining a child.
- **Emotional boundary violations:** where a staff member fails to respect the emotional needs and wellbeing of students; and
- **Behaviour boundary violations:** where a staff member fails to comply with the College’s Child Safety Code of Conduct, Staff and Student Professional Boundaries policy, and Behavioural Guidelines.

What Conduct is Not Reportable Conduct?

Not all physical contact, verbal communication and other behaviour of staff is reportable. Examples include:

- Raising their voice to attract attention or restore order in a classroom.
- Comforting a student after an injury and guiding them to the first aid room; and
- Conduct that is established to be accidental.

Reporting the Behaviour of Conduct of Staff Members

Any allegation of inappropriate behaviour or reportable conduct against staff members must be immediately reported to the Executive Principal or a Child Protection Contact Officer.

Should the allegation involve the Executive Principal, reports must be made to a Child Protection Contact Officer. Verbal reports must be followed by a written report.

If a staff member becomes aware of any allegation against him/her of inappropriate behaviour towards a student, they must report the matter to the Executive Principal without delay.

What Happens after an Internal Report is Made?

Depending on the nature of the allegation, following a report to the Executive Principal or a Child Protection Contact Officer, the Executive Principal or Child Protection Contact Officer may be legally obliged to report the matter to either Child Safety Services or the Police. The Executive Principal and our Child Protection Contact Officers will follow the College's reporting guidelines outlined in our Child Protection Program as appropriate.

Notifying Other Relevant Authorities:

Depending on the staff member's position at the College the relevant authorities will be notified as follows:

- Queensland College of Teachers for allegations against a registered teacher, refer to ***Conduct that is Reportable to the Queensland College of Teachers*** for more information.
- Director of Professional Standards (Towards Healing) for allegations against clerics or persons of a religious capacity; and
- Relevant church authority for allegations against clerics or persons of a religious capacity, upon consultation with the Police.

Risk Assessment:

An internal risk assessment will immediately be conducted by the Executive Principal or a Child Protection Contact Officer in consultation with the Police, to determine whether the staff member subject to the allegations should continue to be allowed to work in the College.

There are two possible outcomes of a risk assessment:

- The staff member's duties are restricted; or
- The staff member is stood down from their duties.

Informing Staff of Allegations:

The Executive Principal will inform staff of allegations made against them, after seeking advice from Child Safety Services or the Police as to when it is appropriate to inform the staff member.

- A meeting will be held between the staff member, their support person (voluntary) and the Executive Principal to give staff the following information:
- An allegation of harm or abuse has been reported about them.
- The reported information has been given to the Police.
- Contact details of the person/s managing their matter who can provide information in relation to the investigation process; and
- Support services available.

All information provided to the staff member at the meeting must also be given to them in writing.

Informing Parents/Carers of Allegations:

The Executive Principal will inform parents/carers of the student/s involved in the allegation, after seeking advice from Child Safety Services or the Police that doing so will not compromise the investigation in any way.

Impact on Blue Cards and Exemption Cards

Where an investigation leads to findings against the staff member, and depending upon the seriousness of the findings, the Executive Principal or a Child Protection Contact Officer will also need to notify Blue Card Services in relation to working with children checks, blue cards and exemption cards.

Refer to our **Blue Cards** and **Exemption Cards** procedures.

Worker's Responsibilities

All workers are responsible for ensuring:

- Reports of allegations of misconduct are made as soon as possible to the Executive Principal or a Child Protection Contact Officer.
- The Executive Principal is notified of any convictions which relate to reportable conduct.
- Co-operation in any internal investigation.
- Confidentiality is maintained throughout the process; and
- Records of all verbal and written communications are maintained and stored securely.

Conduct that is Reportable to the Queensland College of Teachers

The Education (Queensland College of Teachers) Act 2005 (Qld) requires Arethusa College to notify the Queensland College of Teachers (QCT) as soon as practicable after:

- Starting to deal with an allegation of harm or likely harm to a child due to a teacher's conduct; and
- Stopping dealing with the allegation and the outcome of dealing with the allegation.

The College deals with an allegation if it takes action in relation to the allegation, including by:

- Investigating, inquiring into, or examining the allegation; or
- Referring the allegation to another entity to investigate, inquire into, examine, or otherwise deal with the allegation.

Arethusa College is also required to notify the QCT within 14 days of the dismissal of a teacher in circumstances that call into question the teacher's competence to be employed to teach.

"Harm" under this Act has the same meaning given in the Child Protection Act 1999 (Qld).

The College has developed and implemented procedures for the internal reporting of allegations of staff misconduct in our **Allegations Against College Stakeholders** policy.

The QCT has developed a series of questions for schools to ask if unsure when to make a notification to the QCT. If the College answers yes to any of the following questions, then a notification should be made.

1. Has the College started to deal with an allegation of harm or abuse caused, or likely to be caused, to a student because of the conduct of a teacher?

2. Has the College's dealing with an allegation of harm caused, or likely to be caused, to a student because of a teacher ended for any reason?
3. Has the College dismissed a teacher in circumstances that the College believes call into question the teacher's competence to be employed as a teacher?

Sharing Information Relating to a Child's Safety or Wellbeing

Information Sharing Under the Child Protection Act 1999 (Qld)

The College can share personal information about students and their families with external people and organisations for the purposes of identifying, assessing and responding to child protection or wellbeing concerns.

Chapter 5A of the Child Protection Act 1999 (Qld) (Child Protection Act) enables the sharing of this information in certain circumstances.

Chapter 5A recognises that the safety, wellbeing, and best interests of children are paramount, and prioritises the sharing of information to meet a child's protection and care needs over the protection of an individual's privacy, confidentiality or consent to information sharing.

Chapter 5A enables information to be shared in certain circumstances with and between:

- "Prescribed entities" as defined in section 159M of the Child Protection Act
- "Service providers" as defined in section 159M of the Child Protection Act
- The Department of Child Safety, Youth and Women (Child Safety Services).

This can be done with or without a request for the information from the receiving entity.

Child Safety Services can also make a request for information under section 159N of the Child Protection Act, with which the College **must** comply, except in certain circumstances.

The operation of Chapter 5A allows a broad array of information to be shared to assist families to receive support when needed and to enable collaboration between services to help ensure the safety and wellbeing of children.

Child Safety Services has issued Information Sharing Guidelines (Information Sharing Guidelines), as required by section 159C of the Child Protection Act, to support and guide organisations to understand their obligations when they share information under the Child Protection Act and to support the legislative information sharing framework. The guidelines have informed the development of this policy but do not replace the legislative requirements or this policy.

Consent to Information Sharing

The College is permitted to share information under Chapter 5A without the consent of the child or their family.

However, it is the College's policy that wherever safe, possible, and practical, informed consent to the information sharing will be sought from the student and/or the student's parents/carers.

Further, it is our policy, at enrolment, to inform parents/carers that information about their children may be, or is, provided to other organisations.

When Consent to Information Sharing Will not Be Sought

It is the College's policy to not seek or attempt to seek consent to information sharing under Chapter 5A when it is not safe, possible, or practical to do so. The circumstances in which it may not be safe, possible, or practical to seek consent to information sharing include, but are not limited to:

- It is impracticable or impossible to contact the student or a parent and the matter requires an urgent response
- The person is unable to consent because of a mental health condition, the effects of drugs or alcohol, or non-compliance with medication
- To do so could jeopardise the safety or wellbeing of a person, including when doing so may place someone (other than the alleged perpetrator of harm to a student) at risk of harm, such as when there:
 - Is a threat that a family may go into hiding or abduct a child.
 - Are assaults or threats to assault others.
 - Are attempts of or threatened suicide.
 - Are concerns a child or another person could be coached or coerced.

What Information Can Be Shared?

For the purposes of Chapter 5A, "information" means personal information (including facts or opinions) about an individual, from which the identity of the individual can be ascertained.

Who is Authorised to Share Information on Behalf of the College?

The Executive Principal of the College is a "prescribed entity" for the purposes of Chapter 5A of the Child Protection Act. Only the Executive Principal is authorised to share or receive information on behalf of the College.

Any request for information that is made under Chapter 5A by Child Safety Services, another prescribed entity, or a service provider to a member of staff, or any proposal that the College should seek information under Chapter 5A from Child Safety Services, a prescribed entity or service provider must be directed to the Executive Principal for consideration.

However, where the information to be shared relates to the Executive Principal and/or their conduct, then the Campus Principal is appointed as the Executive Principal for the purposes of information sharing under Chapter 5A of the Child Protection Act.

Who are Prescribed Entities and Service Providers?

The Executive Principal of the College can share information with various other prescribed entities and service providers, including:

- A government agency responsible for adult corrective services, community services, disability services, public health, or housing services
- The Department of Education
- The Queensland Police Service
- Mater Health Services
- The principals of non-state schools
- Specialist service providers (non-government entities funded by the State or Commonwealth to provide services to a relevant child or the family of a relevant child) including Family and

Child Connect Service, Intensive Family Support Service or Assessment Service Connect service providers that provide a service to children or families, for example, a general practitioner or a private counsellor.

- Service providers that are licensees under the Child Protection Act, for example, an organisation that provides placement services such as foster care or residential care services.
- Service providers that are independent Aboriginal and Torres Strait Islander entities for an Aboriginal or Torres Strait Islander child, for example, an individual or entity who facilitates the participation of the child and child's family in decision making processes.

Sharing Information with Prescribed Entities and Service Providers

The Executive Principal may only provide information to, or seek information from, another prescribed entity or a service provider if they reasonably believe that the provision of the information would assist the recipient of the information:

- To decide whether to report suspected harm or risk of harm to a child to Child Safety Services (section 159MA)
- To participate in case planning, to assess or respond to the health, educational or care needs of a child in need of care and protection or to otherwise make plans or decisions relating to, or provide services to, a child in need of care and protection (section 159MC)
- To assess or respond to the health, educational or care needs of a child, to make plans for or decisions about a child or their family, or to provide or offer to provide services to a child or the child's family to decrease the likelihood that the child will become in need of protection (section 159MD).

Once the required "reasonable belief" is formed, the information may be provided regardless of whether the prescribed entity or service provider has requested the information.

Whether a belief is reasonable will depend on the situation.

The information provided by the College may contain facts or opinions. The personal information that is shared should be limited to what is needed to fulfil the purpose of sharing the information.

Information can be shared with prescribed entities and service providers under these provisions either verbally or in writing. However, where the information is shared verbally, it is the College's policy that a record of this information sharing will be made. See ***Child Protection Record Keeping***.

Requests for Information by Prescribed Bodies and Service Providers

A prescribed entity or service provider may request another prescribed entity or service provider to provide it with information under their possession and control.

It is the College's policy that the Executive Principal will comply with all requests for information from prescribed entities and service providers if:

- The request contains sufficient information to enable the Executive Principal to form the required reasonable belief; and
- No exception under the Child Protection Act (or other legislation) to the information sharing exists. See ***Exceptions to Sharing Information***.

For guidance as to what information would be regarded as sufficient for the purposes of responding to an information request received under the legislation, see the examples on pages 7 to 8 of the ***Information Sharing Guidelines***.

Sharing Information with Child Safety Services

There are two avenues under Chapter 5A for sharing information with Child Safety Services: voluntary sharing of information and mandatory sharing of information.

Voluntary Information Sharing with Child Safety Services:

Information may be provided voluntarily to Child Safety Services by the Executive Principal, with or without a request from Child Safety Services, if the Executive Principal reasonably believes that the information will help Child Safety Services to:

- Investigate an allegation of harm or risk of harm to a child, or assess a child's need for protection (section 159MB)
- Take action under, or consider whether it reasonably suspects that a child is in need of protection for the purposes of, section 14 of the Child Protection Act (section 159MB)
- Investigate or assess, before the birth of a child, the likelihood that the child will need protection after birth (section 159MB)
- Develop or assess the effectiveness of the child's case plan (section 159MC)
- Assess or respond to the health, educational or care needs of a relevant child (section 159MC)
- Otherwise make plans or decisions relating, or provide services, to a relevant child or their family (section 159MC)
- Offer help and support to a pregnant woman under section 21A of the Child Protection Act (section 159MC).

Child Safety Services can also voluntarily share information with the College. It can provide the Executive Principal with information to help the Executive Principal to decide whether to share the requested information. It can also provide information to enable the College to:

- Participate in case planning.
- Assess or respond to the health, educational or care needs of a child; or
- Otherwise make plans or decisions about or provide services to a child or their family.

It is the College's policy that, where Child Safety Services makes a request for information under sections 159MB and 159MC, the Executive Principal will comply with the request if:

- The request contains sufficient information to enable the Executive Principal to form the required reasonable belief that the information may assist Child Safety Services to undertake any of the actions in sections 159MB and 159MC; and
- No exception under the Child Protection Act (or other legislation) to the information sharing exists. See ***Exceptions to Sharing Information***.

For guidance as to what information would be regarded as sufficient for the purposes of responding to an information request received under the legislation, see the examples on pages 7 to 8 of the ***Information Sharing Guidelines***.

Mandatory Information Sharing with Child Safety Officers:

Under section 159N, if the College receives a request from Child Safety Services to provide it with specific, stated information which Child Safety Services reasonably considers relevant for the performance of a function or exercise of a power under the Child Protection Act, the Executive Principal must comply with the request unless:

- The information is not in the possession or control of the College; or
- An exception to the information sharing exists. See ***Exceptions to Sharing Information***.

Child Safety Services will usually make section 159N requests in writing. Child Safety Services will usually include the following in its section 159N request, to ensure that sufficient information is provided to enable the Executive Principal to provide the requested information:

- Why the information is being requested.
- The purpose or function for which the information is needed (e.g., to assist in an investigation or assessment, to assist in ongoing intervention, or for court purposes) and the date by which the information is required.
- The timeframe of the information being requested (e.g., is the information current or historical, a date range, etc?)
- Who the information request is about and their relationship to the child?
- The link between the information requested and the concerns for the child.

Exceptions to Sharing Information

Exceptions to sharing information, and in particular to mandatory information sharing with Child Safety Services, exist under section 159N(3)

and section 159NA.

The College **does not** have to provide any requested information (section 159N(3)) if it reasonably considers that:

- To do so could be reasonably expected to:
 - prejudice the investigation of a contravention or possible contravention of the law in a particular case; or
 - prejudice a coronial investigation; or
 - enable the existence or identity of a confidential source of information, in relation to the enforcement or administration of a law, to be ascertained; or
 - endanger a person's life or physical safety; or
 - prejudice the effectiveness of a lawful method or procedure for preventing, detecting, investigating, or dealing with a contravention or
 - possible contravention of the law; and
- Would not be in the public interest.

The College also **does not** have to provide information that relates to (section 159NA):

- a 'spent' conviction. Convictions are automatically 'spent' if a certain time period has elapsed since the conviction and the person has had no other convictions during that time. This is called the 'rehabilitation period' and its length depends on:
 - whether the person was an adult or a child at the time of the conviction;

- whether the conviction was entered in the Magistrate's, Supreme or District Court or another jurisdiction's equivalent; and
- whether a term of imprisonment was imposed and, if so, for how long;
- an expunged conviction or an expunged charge.

Responding to an information Sharing Request

When an information sharing request under Chapter 5A is received, it is the College's policy that the following steps must be followed:

- If the request is received by a person other than the Executive Principal, the request must be forwarded to the Executive Principal, who will document:
 - the date of the request
 - the person or organisation requesting the information
 - a brief summary of the information sought
 - the date by which the information is requested (or, if from Child Safety Services, required).

The Executive Principal must determine whether the person or organisation requesting the information is Child Safety Services, a prescribed entity, or a service provider within the meaning of section 159M of the Child Protection Act.

If the request is made by Child Safety Services, the Executive Principal must determine whether the request is made under section 159N and is therefore a mandatory information sharing request.

Requests by Child Safety Services, prescribed entities or service providers for voluntary information sharing:

Unless the request by Child Safety Services is made under section 159N, the Executive Principal must determine if sufficient information has been given by Child Safety Services, the prescribed entity, or the service provider to enable the Executive Principal to form the required reasonable belief.

- If sufficient information has not been given, the Executive Principal may decline the request;
- if sufficient information has been given, the Executive Principal will consider:
 - whether they have formed the required reasonable belief that the information sharing is for a proper purpose under Chapter 5A; and
 - whether an exception to information sharing exists under sections 159N(3) or 159NA.

The Executive Principal must also consider whether the informed consent of the relevant child and/or the child's parents/carers should be sought and obtained before the information is shared and:

- if so, must seek informed consent; or
- if not, must document the reasons why informed consent has not been sought; or
- if consent was sought but refused, must document that consent was refused and any reasons why the information will be shared despite that refusal.

If the Executive Principal has formed the required reasonable belief and no exception exists, the Executive Principal will comply with the request, regardless of whether there is informed consent of the relevant child and/or the parents/carers.

Requests by Child Safety Services under section 159N:

If the request is made under section 159N by Child Safety Services, the Executive Principal must provide the information unless:

- the information is not in the possession or control of the College; or
- an exception to information sharing exists under sections 159N(3) or 159NA.

Complying with declining a request for information:

If the Executive Principal is going to comply with the information request, the Executive Principal may provide the information either verbally or in writing. In either case, the Executive Principal must document **here**:

- the date on which the information was provided
- how the information was provided (verbally, in writing, providing documents, etc)
- the person or organisation to whom the information was provided
- a brief summary of the information provided.

If the Executive Principal is going to decline the information request, (i.e. Executive Principal does not have the required reasonable belief and/or an exception exists), the Executive Principal will decline the request in writing, giving reasons for declining the request. The Executive Principal must document **here**:

- the person or organisation that requested the information
- the date that the request was declined in writing
- the reasons that the request was declined.

In all circumstances, the Executive Principal must follow the STARR Principles including:

- sharing and storing information securely
- the timely provision of information
- accurate and up-to-date information
- only relevant and appropriate information that does not include unnecessary details
- recording all information sharing decisions.

How to request Information under the Child Protection Act:

If the College wishes to request information about a student or their family from Child Safety Services, a prescribed entity, or a service provider under Chapter 5A, it is the College's policy that the request must be made to the Executive Principal for their consideration.

The Executive Principal will consider whether:

- they have formed the required reasonable belief that the information is requested for a proper purpose under Chapter 5A;
- an exception to information sharing exists under sections 159N(3) or 159NA; and
- informed consent of the relevant child and/or the child's parents should be sought and obtained before the information is sought, and:
 - if so, must seek informed consent; or
 - if not, must document the reasons why informed consent has not been sought; or
 - if consent was sought but refused, must document that consent was refused and any reasons why the information will be shared despite that refusal.

If the Executive Principal determines that the request for information should be made, they should try to contact Child Safety Services, the prescribed entity, or the service provider by telephone before making the request to discuss the College's information needs and ensure that the request is appropriately targeted with the required amount of detail.

The Executive Principal should then follow up in writing and consider providing any of the following details which are relevant to the request:

- the identity of the child
- a sufficient level of detail to understand the information requested
- a sufficient level of detail to understand the purpose of the request, including in particular:
 - an explanation of how the requested information is for a proper purpose under Chapter 5A of the Child Protection Act
 - an explanation of how the information will assist the College to fulfill its obligations under the Child Protection Act
- the background to the request including whether consent of the child or the child's family has been sought
- an indication of the time period for which the information is sought
- a realistic time frame to provide the information.

Restriction on the Use of Information

If any information is provided to the College under Chapter 5A, the College must not, except as otherwise required or permitted by law, use, or disclose the information for any purpose that is not associated with identifying, assessing and responding to child protection or wellbeing concerns for the child to whom the information relates.

Protection from Liability

If any person, acting honestly, provides information in accordance with Chapter 5A, that person is not liable to any civil or criminal action, or any disciplinary action, for providing that information. The person cannot be held to have breached any code of professional etiquette or ethics or to have departed from any accepted standards of professional conduct.

Support for Students Interviewed at the College

The College has certain obligations when a request is made by the Police or Child Safety Services Officers to interview students regarding child protection incidents at the College. Students to be interviewed may include victims, witnesses, and alleged perpetrators.

Support for Students

All students interviewed by the Police or Child Safety Services at the College must be supported. Where possible, the student's parents/carers should be present at any interview. Where this is not practicable, one of the following persons may provide support to the student during the interview, as appropriate:

- the Executive Principal;
- a College Child Protection Contact Officer; or
- in the case of Police interviews, an independent support person over the age of 18 who is not connected with the College, for example, a social worker or non-College nurse.

Consideration should be given to whether there may be a conflict of interest between the independent supportive adult and the student being interviewed. For example, a situation may arise where the Executive Principal or Child Protection Contact Officer is related to the alleged perpetrator of the child protection incident, the student is a family member, or the Executive Principal or Child Protection Contact Officer is the alleged perpetrator.

General Protocols

It is the Executive Principal's responsibility to:

- facilitate interviews requested by the Police or Child Safety Services Officers;
- advise students of their right to have an independent supportive adult, parent or carer present at such an interview;
- arrange for the student to choose an independent supportive adult to be present;
- balance their obligation to protect the rights of students with their obligation to assist the Police and Child Safety Services in their exercise of duty;
- ensure there is someone acting as an independent supportive adult for students interviewed at College by the Police or Child Safety Services Officers; and
- observe confidentiality at all times in the management of a mandatory reporting or criminal case.

Contacting Parents/Carers

Before contacting a student's parents/carers, the Executive Principal must seek advice from the Police or Child Safety Services to determine if parents/carers should be present at the interview.

Where appropriate, parents/carers must be advised of the scheduling of an interview with the Police. Parents/carers should also be advised of interviews that have been scheduled with Child Safety Services where it is deemed to be appropriate. However, Child Safety Services may conduct interviews with students without parental/carers knowledge or consent in exceptional circumstances.

Student as a Victim/Witness

When the Executive Principal allow interviews involving students who may be victims or witnesses, they should:

- support and encourage the student to provide as much information as possible; and
- inform the student that a note of the circumstances and the content of the interview will be made and communicated to their parents/carers as soon as possible, unless doing so would cause a risk of abuse.

Students as a Suspect

If Police need to speak with a student who has allegedly abused another child, or student at the College, this should preferably be done in the presence of the student's parents/carers, or another independent supportive adult.

Complying with Court Orders

A subpoena or witness summons is a court order that compels the College to produce documents and/or attend court to give evidence. Where the Executive Principal or a staff member is issued with a subpoena or witness summons, this will generally be because a party to legal proceedings believes

that the College, the Executive Principal, or a staff member has information or documents that are relevant to the proceeding.

The College will seek external legal advice and support relating to complying with subpoenas or witness summons.

Communications with Parents/Carers

In many cases of suspected child abuse, or where it is suspected that a child is at risk of being abused, it is critical that the child's parents/carers are notified as soon as is practicable after a notification has been made to the appropriate external authority. This enables the child's parents/carers to take steps to:

- prevent or limit their child's exposure to further abuse; and
- ensure that their child receives the support that is needed.

It is the College's policy that any notification made to parents/carers that a child is suspected to have been abused, or to be at risk of being abused, is made by the Executive Principal or a College Child Protection Contact Officer after a notification to either Child Safety Services or the Police has been made.

Before contacting parents/carers the College's Executive Principal or a Child Protection Contact Officer must seek advice from Child Safety Services or the Police, depending on who the report was made to. The Executive Principal or Child Protection Contact Officer will be advised by the relevant external authority not to contact the parents/carers in circumstances where:

- the parents/carers are alleged to have engaged in the abuse.
- a disclosure to the parents/carers may subject the child to further abuse.
- the child is a mature minor (assessed to be sufficiently intelligent and mature to make such decisions on their own behalf) and has requested that the parents/carers not be contacted;
- or
- the notification is likely to have an adverse effect on an ongoing investigation into the incident.

Making Additional Reports

There are some circumstances in which you will be required to make an additional report to an appropriate external authority.

Reporting Further Grounds for Belief or Suspicion

If you hold a reasonable belief that a child has been, or is at risk of being abused, you must still make a report to the relevant external authority about a child even if:

- Child Safety Services or the Police have previously been involved or are currently involved with the child and/or their family; or
- You are aware that another party, such as another staff member or volunteer, or a family member, has raised concerns with the relevant authorities.

Every report is critical to protecting the child by building evidence and enabling external authorities to gain a clear understanding of the risks posed to the child.

Another Person has made a Report

There may be times when two or more staff members at the College (for example, the Executive Principal and a Child Protection Contact Officer) have formed a belief about the same child on the same occasion and based on the same information.

In this situation, it is sufficient that only one of the staff members make a report to the relevant external authority, as the belief is based on the same information. However, the other staff member, who does not make the report, is obliged to ensure that the report has been made and that all grounds for their own belief were included in the report.

If staff members do not agree on what should be reported, for example, the Executive Principal does not agree with a staff member's decision to make a report to an external authority, the staff member remains legally obliged to make a report.

Confidentiality and Privacy

Confidentially of Information relating to Child Protection Matters

Anyone who has access to information regarding a case of suspected child abuse must keep such information confidential and secure and must only disclose or discuss this information with those involved in managing the situation.

You must not provide undertakings that are inconsistent with your reporting obligations in the College's Child Protection Program. In particular, you must not promise a student that you will not tell anyone about the student's disclosure.

Students and any other parties who become involved in the investigation (this may include other students) should be informed of the reporting process and be required to maintain confidentiality.

Inappropriate disclosure will be subject to disciplinary action.

Protection of Reporter's Identity

Reports and referrals made to Child Safety Services or the Queensland Police Service District Child Protection or Investigation Unit (CPIU) are confidential, and the reporter's identity is generally protected by law. Exceptions include if:

- the reporter chooses to inform the child or family of the report;
- the reporter consents in writing to their identity being disclosed;
- a court or tribunal decides it is necessary for the identity of the reporter to be disclosed to ensure the safety and wellbeing of the child; or
- a court or tribunal decides the reporter is required to attend court to provide evidence.

Reporter Liability

A person who makes a mandatory report in accordance with the Child Protection Act 1999 (Qld) or Education (General Provisions) Act 2006 (Qld) will not be held liable for the eventual outcome of any investigation.

Protection of Staff's Blue Car or Exemption Card Status

The College will only be informed of whether an individual passes or fails the screening process. None of the information gathered for the process, such as criminal or professional records, will be passed on to Arethusa College.

Protection of Personal Information

How Arethusa College handles the information we collect about individuals (referred to in the Privacy Act 1988 (Cth) as personal information) is very important, as the people we deal with expect us to handle their personal information properly and we have a legal obligation to do so. Personal information is information, or an opinion, about an identified individual, or an individual who is reasonably identifiable:

- Whether the information, or opinion, is true or not; and
- Whether the information, or opinion, is recorded in a material form or not.

The Privacy Act 1988 (Cth) only applies to personal information that is captured in a written record.

Requests for Information

If you receive a request from the Queensland Police or Department of Child Safety for information relating to a student who has been impacted by child abuse, neglect or grooming, you should:

- obtain the request for information in writing, and
- ensure that the written request includes:
 - the name of the Police or Child Safety officer, the organisation they work for and their contact details
 - a description of the information and/or documents being sought
 - the reasons why information and/or documents are being sought
 - the basis upon which the officer or the organisation believes that they are entitled to access the requested information and/or documents.

When information and/or documents are requested in this way, you may be permitted to share the information. However, you are not compelled to do so.

Information Sharing with the College Community

The College takes great care to assess the relevance and appropriateness of sharing information about a child protection incident before providing any information about child abuse, neglect or grooming to the College community because even the confirmation of an incident or allegation can lead to the identification of a victim.

Child Protection Record Keeping

Effective record keeping about child protection at the College is one of the College's key strategies in the management of its child protection obligations, including the fulfillment of our duty of care.

It is through such record keeping that the College can ensure that, should there ever be a need for evidence of the College's precautions and preventative measures taken in response to the risk of child abuse or other harm, or of the College's response to particular child safety incidents or concerns, the College has well-documented and easily-accessible records.

Refer to our **Records Management Policy** for information on how we store records.

Documenting a Suspicion or Belief of Abuse

Where a staff member, Board directors or Direct Contact Volunteer forms the belief on reasonable grounds that a student is in need of protection, written and dated notes of their observations and concerns should be recorded to assist in a referral/report of child abuse.

All Board directors, staff, Volunteers, Third Party Contractors, External Education Providers, parents, and students are encouraged to use the **Child Protection Incident Report Form Template** as a starting point for documenting information regarding a child protection incident. Where there is a reasonable belief or suspicion of abuse, a copy of all relevant Child Protection Incident Report Forms should be submitted to the Executive Principal or a Child Protection Contact Officer as soon as practicable.

All verbal and written communications regarding child protection matters (including notes of observations, student disclosures, meetings, and telephone calls) must be properly documented. The documented records should include dates and times and enough detail to record key conversations, especially those relating to the student's disclosure.

For the purposes of any current or future internal or external investigations into abuse or grooming allegations, the College maintains records of all evidence and notes relating to the allegations made. This may include:

- notes taken during a meeting with a staff member who is the subject of an allegation;
- reports made by a staff member about the behaviour of a colleague;
- notes taken during a disclosure by a student of abusive or grooming behaviour;
- copies of any reports made to the Police or external bodies about the matter; and
- if the allegation includes claims of inappropriate online activity, any digital copies of correspondence between the student and the staff member who is the subject of the allegation.

All child protection records must be stored securely. Refer to our **Records Management Policy** for information on how we store records.

How to Record Observations, Disclosures or Allegations of Abuse

The College requires all members of the College community, including Board directors, staff, Volunteers, Third Party Contractors and External Education Providers to ensure that, where possible, the following information is recorded:

- whether the child needed first aid, and if so who administered it and whether follow up medical care was/is required;
- the child's information including: name, age, gender, address and parent/carer information;
- whether the child has any disabilities, or mental or physical health issues;
- whether the child has any known previous history of suspected abuse;
- the child's family background, including cultural/linguistic background;
- the reporter's grounds for the suspicion that a child has been abused, or is at risk of abuse, including behavioural and physical indicators;
- any details of the person alleged to have committed the abuse (if known);
- who the matter was reported to (internally and externally);
- any action that has resulted from the internal/external report; and
- whether the child's parents/carers have been contacted.

It is important to note that it is not your role to quiz the child or person making the disclosure or allegation – you should only record the information that is offered during the disclosure or allegation, and then report the matter to a Child Protection Contact Officer or the Executive Principal and any relevant external agencies in line with your legal obligations.

All notes and records made regarding child protection incidents are to include, where possible, the information above, and are to be given to the Executive Principal or a College Child Protection Contact Officer. The College maintains these records indefinitely. Records relating to a child protection incident are only disposed of in accordance with our **Records Management Policy**.

Information Sharing Record Keeping

The College must record any information sharing that occurs in relation to the wellbeing of students. Records must be kept of all requests received by and information provided to the College, which information must be documented and stored securely, separate from the student's records.

Information sharing requests and disclosures must be recorded on the appropriate form.

When a request has been received, the College should record the:

- Name of the entity/individual making the request
- Information that was requested
- Date on which the request was made.

When disclosing voluntarily or in response to a request, the College should record:

- the name of the entity/individual who received the information
- if the request was made by a prescribed body, the grounds on which the decision was made to share the information (i.e. the statutory purpose)
- the date on which the information was disclosed
- a summary of the information that was disclosed
- whether the views of the child or young person and/or their relevant family members were sought and consent obtained.

When making a request, the College should record the:

- date of the request
- name of the entity/individual that the request was made to
- information that was sought
- grounds on which the information was sought.

See ***Sharing Information Relating to a Child's Safety or Wellbeing***.

Recording Other Child Protection Actions

Section 33D of the Civil Liability Act imposes a duty of care on the College to:

- take reasonable steps
- to prevent a person associated with the College
- from perpetrating sexual or serious physical abuse of a child
- in connection with the College's care, supervision, control, or authority over the child.

If a victim of child sexual or serious physical abuse alleged to have occurred at the College or to have involved College Staff, Volunteers or Contractors brings a negligence claim against the College under the Civil Liability Act, a court will presume that the College breached its duty of care unless the College can prove that it took all reasonable steps to prevent the abuse.

Whether or not the College took all reasonable steps to prevent the abuse will be assessed by the court in accordance with considerations set out in the Civil Liability Act and case law. The effective implementation of the College's risk management strategies in Child Protection Risk Management is an example of taking reasonable steps to prevent the abuse of a child.

In determining whether the College took reasonable steps to prevent the abuse, a court may take into account any of the following:

- the nature of the College
- the resources reasonably available to the College
- the relationship between the College and the child
- whether the College has delegated in whole or in part the exercise of authority, power, or control over the child to another organisation
- the level of control the College had over the individual who perpetrated the abuse, including the extent to which the position gave them an ability to achieve intimacy with the child or gain the child's trust.

It is critical that the College maintains accurate and comprehensive records of:

- child safety incidents and concerns involving College Staff, Volunteers and Contractors
- actions taken in response (including systemic reviews and resulting improvements) and
- annual reviews of and improvements to our child protection policies, procedures, work systems and strategies

As these could be required as evidence in relation to possible future negligence claims against the College for damages in respect of sexual or serious physical abuse. For more information, refer to **Annual Reviews** and **Continuous Improvement**.

For more information about the College's record keeping procedures, refer to **Child Protection Risk Management** and our general **Records Management Policy**.

CHILD PROTECTION PROGRAM BREACH MANAGEMENT PLAN

Arethusa College has developed an action plan for managing breaches of our Child Protection Program in a fair and supportive manner.

What is a "Breach" of the Program?

A "**breach**" of the College's Child Protection Program includes any action or inaction by a Board director, staff member, Volunteer, Third Party Contractor, External Education Provider, parent/carer, visitor, or student that fails to comply with any part of Arethusa College's Child Protection Program including the College's:

- Statement of Commitment to Child Safety and Wellbeing.
- Child Safety Code of Conduct and associated Behavioural Guidelines including the College's Staff and Student Professional Boundaries policy.

- Child safe recruitment, selection, training and management of staff and Volunteers procedures.
- Policies and procedures for responding to and reporting allegations, suspicions and disclosures of harm or abuse.
- Child protection risk management policies and procedures; and
- Blue Card System compliance, review, and improvement procedures.

Why Have a Breach Management Plan?

Without a Breach Management Plan, the College community may experience:

- Hesitation to report or confusion about how to report breaches.
- Breaches going unreported.
- Repetition of similar breaches without the knowledge of the College; and
- Inconsistency in the action taken by the College in response to a breach.

Who Must Comply with the Plan?

All Board directors, staff members, Volunteers, Third Party Contractors, External Education Providers, parent/carers, visitors, tutors, and students must comply with the Breach Management Plan, specifically their responsibility to report breaches of the Child Protection Program.

Responsibilities

Breaches of the Child Protection Program will be managed by the Executive Principal in consultation with the College's Child Protection Contact Officers, Human Resources Manager and Blue Card Systems Manager where necessary.

How to Report a Breach

Any member of the College community may contact one of the College's Child Protection Contact Officers to report a breach of the College's Child Protection Program. For Child Protection Contact Officers' contact details see ***Our Child Protection Contact Officers – Make a Report.***

All Board directors, staff, Volunteers, Third Party Contractors, External Education Providers, parents/carers, and students are encouraged to use the ***Child Protection Program Breach Reporting Form Template*** as a starting point for documenting information regarding a breach of the College's Child Protection Program. The Form's questions should in no way limit an individual's report of information regarding a breach of the Program.

All available information should be recorded and reported.

All Child Protection Program Breach Reporting Forms should be submitted to the Executive Principal or a Child Protection Contact Officer as soon as practicable.

Process for Managing Breaches

Breaches of the College's Child Protection Program will vary in severity and, as such, the management of breaches will vary depending on the classification of the breach.

The College has identified the following categories of breach and appropriate action to be taken to manage the breach:

Breach Category	Action to be Taken
<p>Mistake</p> <p>Failure to complete a task or fulfil a role required of them by the Program, with the exception of reporting abuse or harm.</p>	<p>Additional Child Protection Training, including a clarification of their role in the College.</p>
<p>Minor</p> <p>Failure to comply with the College’s Child Safe Human Resources Practices or Blue Card/Exemption Card procedures, with the exception of the procedures for Blue Card renewal.</p>	<p>Additional Child Protection Training, clarification with other members of the College community to ensure clarity surrounding HR and Blue Card obligations, and review of relevant sections of the Program for clarity and effectiveness.</p>
<p>Moderate</p> <p>Failure to comply with the College’s Statement of Commitment to Child Safety and Wellbeing, Child Safety Code of Conduct or internal reporting procedures for abuse or harm.</p>	<p>Disciplinary action to be taken by the College, and additional Child Protection Training focusing on child safe behaviours, reporting and the College’s safe and supportive child protection culture.</p> <p>Flagrant breaches of the College’s Child Safety Code of Conduct may result in suspension or summary dismissal.</p>
<p>Severe</p> <p>Failure to follow procedures for reporting harm or abuse to external agencies or the Police, breaches of confidentiality and privacy guidelines relating to child protection reporting, and serious breaches of the College’s Staff and Student Professional Boundaries policy.</p>	<p>Disciplinary action to be taken by the College and additional Child Protection Training to be assigned, focusing on reporting, confidentiality, and privacy obligations.</p> <p>For serious breaches of the College’s Staff and Student Professional Boundaries policy, such as inappropriate personal, physical or intimate relationships with students, the College will take severe disciplinary action including summary dismissal where appropriate, and will make the appropriate reports to Child Safety Services, the Police and relevant authorities such as the QCT.</p>

The Executive Principal, in consultation with the College’s Child Protection Contact Officers, Human Resources Manager and Blue Card Systems Manager, may deviate from the specified action for a breach of the Program where there are exceptional or unique circumstances.

Process for Recording Breaches and Outcomes of Actions

Arethusa College ensures that the following information relating to breaches of the Child Protection Program are recorded and stored for at least seven years:

- Name of the reporter and the name and position of the person who received the report.
- The date the report was initially received and, if different, the date it was reported to the Executive Principal.
- The names of the parties involved in the breach.
- A description of the incident or breach
- The outcome of any investigation that took place; and
- Action taken by the College.

CHILD PROTECTION RISK MANAGEMENT

The College has developed a comprehensive **Risk Management Program** that was drafted in accordance with the principles and standards of AS/NZS ISO 31000:2009 Risk Management – Principles and Guidelines.

The College implements our Risk Management Program to adopt a risk management approach to child protection by developing and implementing strategies to identify and mitigate our child protection risks based on:

- The nature of all College environments.
- The activities students undertake at the College (including those provided by Third Party Contractors or External Education Providers, whether inside or outside the College’s physical environment).
- Physical and online environments that exist at the College; and
- The characteristics and needs of all of our students.

Risk Management Plans for High-Risk Activities and Special Events

The College also develops specific Risk Management Plans for high-risk activities and special events which may include, but are not limited to:

- Off-campus excursions.
- Overnight College camps
- On and off-campus sporting events such as athletics or swimming carnivals; and
- College Open Days and other events where a large number of visitors come to the College.

The College uses our Risk Management Program to ensure that all high-risk activities and special events undergo a rigorous risk assessment process before they are approved by the College to go ahead. This includes a documented process of:

- communicating and consulting with relevant stakeholders to understand the scope of the activity or event;
- describing the activity or event in great detail, including the purpose, objectives, key elements, location, environmental factors, and persons involved;
- identifying risks of harm or abuse to children and young people;
- analysing and classifying the risk in terms of both the likelihood and consequences of the risk event occurring;
- evaluating the risks to make decisions about how to treat or control them;
- putting the determined risk treatments and controls into action; and

- managing the risks by monitoring and reviewing the risk treatments and controls on an ongoing basis.

Arethusa College's Assurance System

The College has developed and implemented an online Assurance system to enable the College to identify, analyse, evaluate, manage, reassess, and review child protection, safety and wellbeing risks in all College environments, including during off-campus and high-risk events and activities.

Our Assurance system is an online risk and compliance workflow management tool that integrates with our Child Protection Program to provide a system of risk management, compliance and continuous improvement based on international standards.

Through this system, key risks and compliance obligations are captured and converted into plain-English questions that are assigned via email to responsible individuals for action. Each individual is provided with a calendar view of their compliance performance via an online browser. Unactioned tasks are escalated and reported to allow the College to monitor its compliance performance in real-time.

COMPLIANCE, REVIEW AND IMPROVEMENT

To ensure that the College is continuously complying with our legislative and regulatory requirements under the Blue Card System, we have developed a series of policies and procedures relating to compliance, review and improvement of our Child Protection Program.

These include:

- Compliance with the Blue Card System
- Annual Reviews
- Continuous Improvement

Compliance with the Blue Card System

In addition to the College's documented procedures relating to Blue Cards and Exemption Cards, and our Child Safe Human Resources Practices, the College has appointed a Blue Card System Manager who is responsible for Blue Card System compliance at Arethusa College.

Blue Card System Manager

Our Blue Card System Manager is **Katrina Trentham**.

The Blue Card System Manager's role includes:

- Overseeing the compliance of staff members, Volunteers and Board directors who are required to have Blue Cards or Exemption Cards.
- Creating and maintaining a Blue Card Employee Register that records the Blue Card details of each individual at the College who requires either a Blue Card or Exemption Card.
- Ensuring an annual review of the College's Child Protection Program, specifically the Blue Card and Exemption Card procedures is conducted by an appropriate member of staff.
- Informing the College's Child Protection Contact Officers of any updates to the Child Protection Program or Blue Card procedures at the College.

- completing and signing applications to ***Link an applicant/cardholder to this organisation form***; and
- Answering any questions that Board directors, staff members, Volunteers or parents/carers may have relating to either the Blue Card application process, or the College's Blue Card and Exemption Card policies and procedures.

Blue Card System Documentation

It is the responsibility of the College's Blue Card System Manager to verify the status of all Arethusa College staff and non-parent Volunteers' Blue Cards and Exemption Cards, where applicable.

Parents who volunteer for child-related work at the College do not need a Blue Card, if their child is participating in the activity, or normally participates in the activity.

Arethusa College maintains a Blue Card Register to keep track of who is required to have a Blue Card, along with relevant details for each person including:

- full name and date of birth;
- Blue Card type (paid, Volunteer, student or business)
- Blue Card status (valid card or application in process);
- the date the application was submitted;
- Blue Card number;
- expiry date of Blue Card;
- date renewal form to be submitted (at least 30 days prior to expiry date);
- whether the Blue Card System Manager has sighted ID for the Blue Card holder/applicant; and
- whether confirmation of the valid card/application from Blue Card Services has been received.

A copy of the register is available from Human Resources.

The College also maintains appropriate and confidential records in relation to the following:

- whether a negative notice has been issued;
- any change in status to a Blue Card or Exemption Card held by an individual at the College, for example the cancellation or suspension of a Blue Card or Exemption Card;
- where there is a change in police information relating to a Card holder, the date the College informed Blue Card Services of the change;
- when an individual leaves the College and the date the College notified Blue Card Services; and
- any change to an individual's personal information, including the date the individual informed Blue Card Services.

Blue Card records and the Blue Card Register are maintained by the Blue Card System Manager.

Records must always be readily available, should they be required for audit and monitoring purposes conducted by Blue Card Services.

Annual Reviews

Regular reviews of the College's Child Protection Program ensure that it remains up-to-date with any legislative changes and continues to be effective in addressing the risks to children and young people at the College.

At Arethusa College, our Program is reviewed annually, and after any child protection incident at the College, by an appropriate member of staff. During the review process we ensure legal and regulatory compliance and seek to include input from relevant members of the College community including staff members, Volunteers, parents and students.

As part of our annual review, the College considers:

- The level of internal compliance with the College's Child Protection Program, noting any significant breaches.
- Any child protection incidents that occurred during the year, noting frequency and possible contributing factors.
- The process used to manage any child protection incidents at the College, noting the positives and areas for improvement; and
- The content and frequency of child protection training for staff and Volunteers at the College, noting any significant feedback from staff and Volunteers about the training.

Each annual review is documented and maintained for a period of at least seven years.

Where a review is conducted following a child protection incident, the College considers:

- The severity of the incident.
- The first response of the individual who reported the incident, including the effectiveness of continuing support for the student/s involved.
- The College's compliance with internal and external reporting obligations.
- Whether the incident was a result of a gap in the College's Child Protection Program.
- How the Child Protection Program could be improved or adapted to ensure the gap is addressed; and
- Steps to be taken by the College following the incident, for example communication to parents/carers or the wider College community, if appropriate.

Continuous Improvement

Arethusa College is committed to continuous improvement in all its operations including this Child Protection Program.

This final step of our Compliance, Review and Improvement cycle involves using the data collected through various channels and collated in our annual review of the Program, as well as research into any legislative or regulatory updates, to identify key areas that require improvement or amendment to ensure that our Child Protection Program is functioning effectively to ensure the protection, safety and wellbeing of children and young people at the College.

This is an ongoing process that is monitored by the College's Executive Principal, Child Protection Contact Officers and Blue Card System Manager.

Communication and Support

Arethusa College acknowledges that our Child Protection Program will be most effective if it is communicated to all people in the College community, and those people feel supported to discuss, address and respond to child protection issues at the College.

Communication

The College makes our Statement of Commitment to Child Safety and Wellbeing and Child Safety Code of Conduct available on the College's public website to ensure that they are readily accessible by all members of the community. Hard copies of these documents are also available at the College's Reception area.

Copies of the College's other child protection policies and procedures are available on request.

Arethusa College's Child Protection Program is also communicated in the following ways:

- The College's induction training for staff members and Direct Contact Volunteers.
- Regular information sessions for staff members about specific child protection issues at the College.
- The provision of child protection training sessions at least annually for staff members and Direct Contact Volunteers, including during professional development days; and
- The provision of child protection information, including reporting procedures, in College newsletters and direct parent/carer communications.

Support: Reporters

Arethusa College provides child protection training to Board directors, staff members and Direct Contact Volunteers who are required to deal with issues such as child protection concerns and dealing with disclosures or suspicions of harm or abuse to ensure that they receive appropriate information for responding to these issues.

The College has also appointed a number of Child Protection Contact Officers who can assist Board directors, staff members and Direct Contact Volunteers in responding to child protection issues and disclosures of harm or abuse.

Support: Students and Families

Experiences of child abuse can cause trauma and significantly impact on the mental health and wellbeing of children. In addition to reporting and referral to the relevant authorities, the College plays a central role in addressing this trauma and has a duty of care to ensure that the students feel safe and supported at College.

If a student is impacted by abuse, Child Protection Contact Officers must work with the student and their family to develop a Student Support Plan and engage external support services which specialise in supporting children impacted by abuse.

Students and parents/carers are also able to contact the College's Child Protection Contact Officers to access support.