



BRISBANE GRAMMAR SCHOOL

Child Protection Policy and Child Risk Management Strategy

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1. Purpose and Application

The purpose of this Child Protection Policy (**Policy**) is to provide written processes about the appropriate conduct of staff, parents and students of Brisbane Grammar School (referred to in this Policy as “BGS” or “the School”) that accord with best practice and comply with legislation applying in Queensland about the care and protection of students, and in particular processes for:

- **Reporting of harm:** Students, parents, staff members, a Deputy Headmaster, the Head of Middle School or the Headmaster to report harm, and for staff members, a Deputy Headmaster, the Head of Middle School or the Headmaster to manage reports of harm as set out in **Annexure A** (it also includes processes for dealing with “reportable suspicions” of teachers and registered nurses).
- **Reporting of sexual abuse:** Staff members and the Headmaster to report sexual abuse of a student (including likely sexual abuse) and for the Headmaster and Members of the Board of Trustees to manage reports of sexual abuse of a student as set out in **Annexure B**.
- **Reporting of inappropriate behaviour:** Students, parents and staff members to report inappropriate behaviour by a staff member and for Heads of Year, a Deputy Headmaster, the Head of Middle School or the Headmaster to manage reports of inappropriate behaviour by a staff member as set out in **Annexure C**.

This Policy applies to all staff, parents and students at BGS and to the BGS Board of Trustees.

The BGS *Child Risk Management Strategy* is set out in **Annexure D**.

2. Legislation

- Child Protection Act 1999 (Qld) (**Child Protection Act**)
- Child Protection Regulation 2011 (Qld) (**Child Protection Regulation**)
- Working with Children (Risk Management and Screening) Act 2000 (Qld) (**Working with Children Act**)
- Working with Children (Risk Management and Screening) Regulation 2011 (Qld) (**Working with Children Regulation**)
- Education (General Provisions) Act 2006 (Qld) (**2006 Education Act**)
- Education (General Provisions) Regulation 2006 (Qld) (**2006 Education Regulation**)
- Education (Queensland College of Teachers) Act 2005 (Qld) (**QCT Act**)
- Education (Accreditation of Non-State Schools) Act 2001 (Qld)
- Education (Accreditation of Non-State Schools) Regulation 2001 (Qld) (**Accreditation Regulation**)

3. Definitions

In this Policy and its Annexures:

“Child in need of protection” is 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.

“Harm” is any detrimental effect of a significant nature on a child’s physical, psychological or emotional wellbeing, irrespective of cause. Causes of harm may include, but are not limited to: physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. Harm may be caused by a single act, omission or circumstance, or by a series or combination of acts, omissions or circumstances.

“Inappropriate behaviour” is behaviour of a staff member that another staff member, student or parent considers inappropriate. For example, behaviour which is inconsistent with the Staff Code of

Conduct or other policies or procedures of the School.

“**Police**” means the Queensland Police Service.

A “**Respondent**” is a staff member (whether teaching or administrative), volunteer, other member of the School community (such as a parent or visitor to the School) or student who is the subject of an allegation dealt with under this Policy.

“**Sexual abuse**” includes sexual behaviour involving a student and another person where: the other person bribes, coerces, exploits, threatens or is violent toward the student; the student has less power than the other person; there is a significant disparity between the student and the other person in intellectual capacity or maturity.

“**Staff**” or a “**staff member**” means all employees, and other personnel such as consultants, contractors, people undertaking work experience or vocational placements or volunteers working for the School.

A “**student**” is any person regardless of age who is enrolled at the School.

A “**parent**” includes a legal guardian.

STATEMENT OF COMMITMENT

BGS aims to provide a positive and supportive environment where learning and skill development is encouraged and facilitated.

The School is committed to the safety and wellbeing of all students in the School’s care. The School’s staff will treat all students with respect and understanding.

In order to support this commitment, the School is dedicated to regular review of its policies, procedures and guidelines which have been put into place to effectively address the safety and wellbeing of students.

4. Principles, Practices and Guidelines relating to Harm, Sexual Abuse and Inappropriate Behaviour

Principles and Practices

BGS will uphold the following principles and practices under this Policy:

- Protecting students from harm and the risk of harm including sexual abuse or inappropriate behaviour is fundamental to maximising their personal and academic potential.
- BGS recognises that students who are subjected to harm will usually be detrimentally affected by it.
- At BGS, the welfare and best interests of the student will always be a primary consideration.
- BGS requires its students to show respect to staff, volunteers and each other, and comply with safe practices.
- All staff of the School must ensure that their behaviour towards and relationship with students reflect proper standards of care for students, and are not unlawful. In particular, staff of BGS must not under any circumstances engage in physical or emotional abuse or engage in sexual contact of any nature with a student of the School. It is irrelevant whether the conduct is consensual or non-consensual, or condoned by parents or caregivers. The age of the student is also irrelevant.
- Failure of staff to behave in an appropriate manner toward students may result in criminal proceedings and/or disciplinary action, including dismissal.
- BGS will respond appropriately to a report of reasonably suspected or actual harm, or risk of harm to a student.
- Reprisals against students or others making a report under this Policy will not be

tolerated.

- BGS will act fairly and reasonably towards both the student who has been or is suspected of having been harmed and a Respondent.
- BGS will provide appropriate support to both the student who has been or is suspected of having been harmed or at risk of harm, and their parents, and a Respondent.
- BGS staff members, students or parents who become aware of or reasonably suspect that a student is being harmed or is at risk of harm must report it in accordance with the School's reporting procedures (refer to the **Annexures** to this Policy).
- BGS will take appropriate disciplinary action against any member of the School's staff who harms a student.
- BGS will not permit a person to work in a position in which the School reasonably believes there would be an unacceptable risk of harm to a student.
- BGS will cooperate with external authorities including the Police and Child Safety Services to address allegations of harm.

Staff members at BGS are expected to reflect the highest standards of care in their behaviour towards and relationships with students.

Guidelines

In complying with these principles and practices, BGS will be guided by the following:

Fair and Simple Process

The following principles will apply to the application of this Policy:

- That those making a decision are not biased.
- That no adverse action is taken against a person unless the person is given prior notice of the allegations against him/her and he/she has a fair opportunity to respond.

The School will ensure the process for reporting under this Policy is simple and easily accessible.

Confidentiality and record keeping

Each person who has access to information covered by this Policy must observe appropriate confidentiality. BGS is unable to guarantee absolute confidentiality since applicable legislation and its policies will require disclosing, internally and externally, certain details involved in responding to complaints. External authorities such as the Police and Child Safety Services can compel a person to provide information and give evidence about actions under this Policy and to produce documents.

BGS will keep a confidential record of matters dealt with under this policy, including in individual student files, staff files and centrally, as appropriate. The BGS *Privacy Policy* sets out how the School manages personal information provided to or collected by it that is covered by the *Privacy Act 1988* (Cth).

Criminal Conduct

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

Defamation

A person acting reasonably and honestly providing information to a person who needs to know that information (such as a staff member, a Deputy Headmaster, the Head of Middle School, the Headmaster or a Police officer) is generally excused from liability for defamation.

Retaliation

No person may retaliate or take any adverse action against a person acting reasonably and honestly who provides information to a person who needs to know that information (such as a staff member, a Deputy Headmaster, the Head of Middle School, the Headmaster or a Police officer).

Promptness

All steps under this Policy must be carried out promptly.

Preventing Harm

In order to reduce the chance of any harm occurring, the Headmaster will implement the *Child Risk Management Strategy* in **Annexure D** to this Policy, including procedures to ensure the following:

- Each staff member understands and fulfils his/her obligations under this Policy.
- The School obtains acceptable references for each staff member engaged since the commencement of this Policy, including from his/her previous employer (where applicable).
- Each non-teaching staff member, volunteer or other relevant person who has contact with students at all times holds a current blue card issued by the relevant authority in accordance with the requirements of the Working with Children Act.
- Each teaching staff member is a registered teacher with the Queensland College of Teachers in accordance with the QCT Act.

Support

The School will provide support for both the student who has been or is suspected of having been harmed or at risk of harm, the student's parents, and the Respondent, through professional counselling (either internal or external), even if the allegations have not yet been proven or disproven.

Interviews

If a report is made under this Policy and a staff member is to interview a student involved, then two representatives of the School will be present at the interview, where practical.

Teachers

If a Respondent is a registered teacher, the School will give notification of any matter dealt with under this Policy to the Queensland College of Teachers, if required to do so under the QCT Act or other applicable legislation.

Police Action

Once a matter has been reported to external authorities, the School is not required to await the outcome of any Police action against the Respondent before taking any internal disciplinary action against the Respondent. The appropriate action is a matter to be determined by the School on a case by case basis.

Insurer

The School will keep its insurer informed about circumstances which may give rise to a claim under the School's insurance policies.

Implementation of this Policy

The Headmaster will ensure members of the School community are made aware of and can readily access this Policy including that:

- The Policy is published in the Staff Handbook.
- The Policy is provided to each new staff member on induction.
- Reference to the Policy is made in staff meetings at least twice each year.
- A suitable version of the Policy for students and parents is published annually in the Student Handbook and the students' Record Book.
- At least once each year the Policy is discussed in School Assemblies and weekly Newsletters.
- The Policy is included annually in the Personal Development Programme for students.
- The Policy is published on the School's website and a hard copy of this Policy is always available from the School's Administration.

The Headmaster will also ensure that:

- The School is implementing the processes under this policy; and
- Staff receive induction and refresher training in implementing the processes under this policy.

Review of this Policy

The School will ensure that this Policy is reviewed at least once every two years.

Complaints

Suggestions of non-compliance with the School's processes set out in this Policy should in the first instance be reported to a Head of Year, Deputy Headmaster or Head of Middle School. If the matter is not resolved, it may then be referred to the Headmaster.

5. Processes for Reporting Harm, including Sexual Abuse, and Inappropriate Behaviour from Within the School

Reporting Procedures

Annexure A to this Policy outlines the School's Procedures for Reporting Harm which must be followed without exception. It also includes processes for dealing with "reportable suspicions" of teachers and registered nurses.

Annexure B to this Policy outlines the School's Procedures for Reporting Sexual Abuse which must be followed without exception.

Annexure C to this Policy outlines the School's Procedures for Reporting Inappropriate Behaviour which must be followed without exception.

Failure by any member of staff to comply with his/her reporting obligations as set out in **Annexures A, B and C** to this Policy, will lead to disciplinary action by the School, which may include dismissal.

Reporting Guidelines

Staff should be aware of indicators of harm as set out in section 7 below.

The following guidelines are to assist members of staff in any cases relating to harm or reasonably suspected or likely harm against a student:

1. Record details of the allegations. Be careful not to taint the evidence of the student who has

been or is suspected of having been harmed or at risk of harm, the complainant (if the complainant is not the student) or the Respondent.

2. Refer to the School's reporting procedures in the **Annexures** to this Policy and determine whether the allegations should be reported to external authorities. If so, report them.
3. Provide details of the allegations in writing to the Respondent and request a written response.
4. Consult with the Board of Trustees or the School solicitor about managing a report of harm, as and when necessary.
5. If there is unacceptable risk, suspend the Respondent from his/her duties, on full pay if the Respondent's role is paid. In extreme and unequivocal cases, the Respondent may be dismissed summarily.
6. Inform the student's parents unless circumstances suggest it would not be in the student's interests to do so.
7. Inform the Board of Trustees.
8. Attend to public relations.
9. Keep the student and the Respondent informed as appropriate as the matter proceeds.

6. Bullying, Discrimination & Sexual Harassment

The School has a responsibility to take reasonable steps to promote a learning environment free from bullying, discrimination and sexual harassment.

To this end, BGS has developed three separate policies to assist in the management of an appropriate learning environment. These policies are:

- *Towards a Safe and Secure Learning Environment: A Policy on Bullying and Discrimination;*
- *Anti-Discrimination Policy;* and
- *Sexual Harassment Policy.*

BGS recognises that bullying, discrimination and sexual harassment will generally amount to harm to a student. If harm is reasonably suspected it must be managed without exception in accordance with the School's Procedures for Reporting Harm (refer to the **Annexures**).

Likewise, if sexual abuse or likely sexual abuse is reasonably suspected, it must be managed without exception in accordance with the School's Procedures for Reporting Sexual Abuse (refer to the **Annexures**).

BGS also has a *Staff Code of Conduct* which sets out the principles to be observed by all staff in their service to the School including respect for persons and professional and appropriate behaviour.

7. Indicators of Harm including Sexual Abuse

It is often the case that students who are harmed are harmed by someone they know and trust – a parent, sibling, other relative, family friend, care provider or person involved in community or religious activities. Staff members and parents should be aware of the physical, emotional and behavioural indicators of risk of student harm, and actual harm. These indicators are more significant if they are severe and/or consistent over time.

INDICATORS OF HARM

Physical abuse and/or excessive punishment

- student presents with bruises, burns or fractures at a frequency which is inconsistent with normal activity;

- student offers explanations for an injury which appear inconsistent with that injury;
- student or another person advises that he/she has been subjected to or threatened with physical harm;
- reluctance/refusal of student to participate in swimming or other activities where getting changed or wearing more revealing clothes may show signs of harm; and
- excessive absenteeism.

Emotional abuse and/or deprivation

- poor peer relationships/withdrawn;
- inclined to seek adult company and/or students who are older or younger;
- regularly avoiding going home;
- learning difficulties, including poor concentration; and
- attention-seeking behaviour such as stealing, lying, running away, and repeatedly disrupting classes.

Physical neglect and/or inadequate supervision and/or care

- student appears underweight for age and body type;
- inadequate clothing;
- poor personal grooming;
- asking other students for food or money or not bringing food for lunches and breaks;
- excessive absences and/or high frequency of illness/infection; and
- student often arrives early and/or leaves late.

Sexual abuse

- bruises, bite marks or other injuries to breasts, buttocks, arms, lower abdomen or thighs;
- bruises, scratches or other injuries not consistent with accidental injury;
- difficulty walking or sitting;
- persistent headaches or recurrent abdominal pain;
- unexplained pain in genital area;
- torn, stained or bloodied underwear;
- itching, soreness, discharge or unexplained bleeding;
- painful and recurrent urination;
- recurrent urinary tract infections; and
- signs of sexually transmitted diseases.

Grooming

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

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

Recognition of the grooming process that is used as a preparation for the sexual abuse of a child is an indicator of likely sexual abuse. Grooming behaviour is unlikely to be recognised when observed as a one-off event, but a pattern of grooming of the intended victim and/or the intended victim’s carers can be recognised. Grooming may tend to develop in intensity

over time. It will also tend to include elements of secrecy and concealment.

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

Some examples of grooming types of behaviour could include:

- Befriending a vulnerable student;
- Giving a student special attention;
- Treating the student more favourably than others, for example with school work or in extra-curricular activities;
- Giving gifts to or doing favours for the student;
- Sharing secrets with the student;
- Arranging opportunities to be alone with the student;
- Sending email or SMS messages of a personal nature;
- Making personal comments to the student about sexuality or relationships;
- Directing suggestive jokes, remarks or actions towards the student;
- Acting as a substitute parent or confidant of the student;
- Befriending the student's family and visiting the family home;
- Offering to babysit or provide transport;
- Offering individual coaching or special help to the student; and
- Cultivating the trust and confidence of the student's parents

8. Processes for Reporting Harm including Sexual Abuse from Outside the School

The tables in **Annexures A and B** to this Policy outline the School's Procedures for Reporting Harm and Sexual Abuse which must be followed without exception.

The role of the staff member is not an investigative one. Staff members must not undertake investigations beyond satisfying themselves that they have reasonable grounds to suspect that a student has been, or is at risk of harm. Neither the staff member nor the Headmaster is obliged to obtain proof, establish the cause of harm or assess its severity.

Once a report has been made in accordance with the School's Procedures for Reporting Harm and Sexual Abuse (refer to **Annexures A and B**), the staff member is not required to take further action, beyond continuing to exercise a duty of care and cooperating with any further investigation that is conducted under the Headmaster's direction or by external authorities.

Protections

Relevant legislation provides for protections from liability for persons who, acting honestly and reasonably, notify or give information about suspected harm to a student to Child Safety Services or the Police. Child protection legislation also states that merely because the person gives the notification, the person cannot be held to have breached any code of professional etiquette or ethics, or departed from accepted standards of professional conduct.

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

- the identity of the person reporting the matter, except to others requiring the information to perform duties under the Child Protection Act; nor

- information about an investigation to the person reporting the matter.

Support for the Student and Parents

The School has a responsibility to offer a supportive environment for all students. The following are suggested as ways to support a student who has been harmed and may be in need of protection:

- Treat the student with respect and dignity.
- Be sensitive to the student's needs, feelings and concerns.
- Monitor the situation.
- Maintain confidentiality as far as is practicable.
- Immediately notify the Headmaster if, after the initial report, any further incidents of harm are evident or reasonably suspected.

Appropriate support will also be provided to the student's parents.

Mandatory reporting obligations

There are mandatory reporting obligations under legislation including the Child Protection Act and the 2006 Education Act. These are included in **Annexures A and B**.

Under section 13E of the *Child Protection Act*, teachers and registered nurses¹ (which may include School nurses) have a mandatory obligation to give a written report to Child Safety Services if the teacher or registered nurse forms a "reportable suspicion" in relation to a child.

A "reportable suspicion" is a reasonable suspicion that a child:

- has suffered, is suffering or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and
- may not have a parent able and willing to protect the child from harm.

There are specific requirements regarding the circumstances in which a report must be provided, to whom and the form of the report.

A teacher or registered nurse is **not** required to give a report about a matter if they know or reasonably suppose that Child Safety Services is aware of the matter. If a teacher or registered nurse forms a "reportable suspicion" and notifies this to the Headmaster in accordance with the procedure in **Annexure A** of this Policy, the Headmaster will report it to Child Safety Services and the teacher or registered nurse will not be required to make a separate report.

Further, sections 366 and 366A of the 2006 Education Act, also provide for mandatory reporting by staff of actual, reasonably suspected or likely sexual abuse of a student. Again, there are specific requirements regarding the circumstances in which a report must be provided, to whom and the form of the report. See **Annexure B** to this Policy.

9. Deliberate Self-Harm by Students

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

¹ A registered nurse is a person registered under the *Health Practitioner Regulation National Law Act 2009* (Qld) to practise in the nursing and midwifery profession as a nurse, other than as a student, and in the registered nurses division of that profession.

Self-harm with Suicidal Intent

Youth suicide rates in Australia are high. Common risk factors include:

- previous attempts at suicide (most powerful risk predictor);
- depression;
- drugs and/or alcohol abuse;
- conduct disorder;
- disruptive and unsupportive family background;
- relationship conflicts;
- poor coping skills;
- psychiatric illnesses;
- ready availability of lethal means to commit suicide; and
- copy-cat behaviour after an incident of self-harm by another person.

Other risk factors include:

- recent bereavement;
- chronic physical illness;
- anniversary phenomenon (of past losses or major life events);
- early loss experiences;
- academic failure; and
- perfectionism and overachievement as a result of students having high expectations of themselves.

Self-harm Without Suicidal Intent

Not all cases of self-harm relate to suicidal intent. Students may engage in a variety of high risk behaviours, such as: alcohol/substance abuse; drug-taking; unsafe promiscuity; or cutting/burning oneself.

The School provides educational programmes to assist students to make appropriate choices in relation to drug and alcohol use and sexual activity. Refer to the *Policy on Drugs (including Alcohol and Tobacco) Prevention and Intervention*.

Reporting Student Self-harm

A threat of self-harm or actual self-harm by a student must be taken seriously and reported to the Director of Student Services, School Counsellor, a Deputy Headmaster or the Head of Middle School immediately and managed in accordance with the School's Procedures for Reporting Harm (refer to **Annexure A**). Pursuant to those procedures, the Headmaster, a Deputy Headmaster or the Head of Middle School will ultimately determine whether a report to external authorities is appropriate.

In cases where self-harm occurs or is reasonably suspected of occurring or likely to occur in a context of parents not acting protectively, it may be appropriate to report the harm to Child Safety Services or the Police in accordance with the Procedures for Reporting Harm (refer to **Annexure A**).

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

- ensure the immediate safety of the student;
- arrange for an adult to be with the student at all times; and
- report the harm or reasonably suspected harm as set out above.

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

Following a report from a staff member, the Director of Student Services or a School Counsellor or other appropriate professional will meet with the distressed student on the day of the report to conduct an initial assessment and determine an appropriate course of action.

In cases of serious concern, the Director of Student Services or the School Counsellor under the direction of the Headmaster, will notify the student's parents where appropriate and make arrangements for access to professional assistance.

Self-harm as a symptom of a medical condition or intellectual disability

Where it is known that a student has a propensity to engage in self-harm that is symptomatic or associated with a known medical condition or intellectual disability, the School Counsellor in cooperation with other qualified staff of the School and external treating professionals (where applicable) may devise an individual programme of management to prevent or reduce the likelihood of the student engaging in self-harm while participating in the School's activities.

The programme may complement any other management procedures adopted outside the School setting to address the self-harm behaviour and may be monitored on an ongoing basis and modified as appropriate to maximise socially adaptive behaviour.

10. Related Documents

- *Child Risk Management Strategy (Annexure D)*
- *Recruitment and Selection Policy*
- *Towards A Safe and Secure Learning Environment: A Policy on Bullying*
- *Sexual Harassment Policy*
- *Anti-Discrimination Policy*
- *Staff Code of Conduct*
- *Code of Expectations and Behaviour for Students*
- *Privacy Policy*
- *Policy on Drugs (including Alcohol and Tobacco) Prevention and Intervention*

11. Contact Information

- Blue Card Services (Public Safety Business Agency), telephone 07 3211 6999 or 1800 113 611
- Queensland College of Teachers, telephone 07 3377 4777
- Police (Brisbane City North), telephone 07 3364 6464
- Child Safety Services (Department of Communities) Brisbane Regional Intake Services, telephone 1300 682 254;
- Child Safety After Hours Service Centre, telephone 1800 177 135
- Family and Child Connect 13 32 64

12. Policy Management

Document management	Dean of Administration & Curriculum	
Written by	Version 1.0 H. Stack (Chairman), A. Micallef (DHM-Students), D. Abernethy (Solicitor), Kerryn Hurd (School Counsellor)	2007
Updated	Version 1.1 A. Micallef (DHM – Students) J. Zervos (Head of Middle School)	8 February 2010
Updated	Version 1.2 D. Abernethy (Solicitor) G. North (Solicitor) A. Micallef (DHM-Students)	30 April 2012
Approved by	Board of Trustees Brisbane Grammar School	May 2012
Updated	Version 1.3 D. Abernethy (Solicitor) G. North (Solicitor) A. Micallef (DHM-Students)	March 2013
Updated	Version 1.4 L Dorricott (Solicitor), A Micallef (Headmaster)	September 2014
Updated	Version 1.5 L Dorricott (Solicitor), A Micallef (Headmaster)	January 2015
Updated	Version 1.6 A Micallef (Headmaster), D Abernethy (Solicitor), L Dorricott (Solicitor)	May 2015
Updated	Version 1.7 A Micallef (Headmaster), D Abernethy (Solicitor), L Dorricott (Solicitor)	July 2015

ANNEXURES

Annexure A - PROCEDURES FOR REPORTING HARM

APPLIES TO HARM FROM WITHIN AND OUTSIDE THE SCHOOL (I.E. NOT JUST TO HARM CAUSED BY SCHOOL STAFF)

Subject	If	Then
Reporting Harm (Accreditation Regulations s.10)	Student or Parent You are a student or parent and you are aware or reasonably suspect that a child: <ul style="list-style-type: none"> has suffered, is suffering, or is at unacceptable risk of suffering, significant harm; and may not have a parent able and willing to protect the child from the harm. 	Report the harm or reasonably suspected harm to any staff member.
	Staff Member You are a staff member and you are aware or reasonably suspect that a child: <ul style="list-style-type: none"> has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and may not have a parent able and willing to protect the child from the harm. OR You are a staff member and you receive a report from a student or parent.	<ol style="list-style-type: none"> Report the harm or suspected harm to a Deputy Headmaster, the Head of Middle School or the Headmaster. Keep a written record of your actions.
	Headmaster, a Deputy Headmaster or the Head of Middle School You are the Headmaster, a Deputy Headmaster or the Head of Middle School and you are aware or reasonably suspect that a child: <ul style="list-style-type: none"> has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and may not have a parent able and willing to protect the child from the harm. OR You are the Headmaster, a Deputy Headmaster or the Head of Middle School and you receive a report from a student, parent or staff member. In forming a reasonable suspicion about harm to a child, you should investigate the matter and seek advice from the Chairman of the Board of Trustees and/or the School's solicitor. Have regard to section 13C of the Child Protection Act and the Child Protection Guide published by Child Safety.	<ol style="list-style-type: none"> Report to Child Safety Services. Keep a written record of your actions.
	Teacher or Registered Nurse You are a teacher or registered nurse and you form a reasonable suspicion that a child: <ul style="list-style-type: none"> has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and may not have a parent able and willing to protect the child from the harm ("reportable suspicion"). 	<ol style="list-style-type: none"> Notify the reportable suspicion to the Headmaster, a Deputy Headmaster or the Head of Middle School. Keep a written record of your actions.
Reporting a reportable suspicion of harm (Child Protection Act s.13E and 13G; Child Protection Regulation s.10)	Headmaster, a Deputy Headmaster or the Head of Middle School You are the Headmaster, a Deputy Headmaster or the Head of Middle School and you form a reasonable suspicion that a child: <ul style="list-style-type: none"> has suffered, is suffering, or is at unacceptable risk of suffering, significant harm caused by physical or sexual abuse; and may not have a parent able and willing to protect the child from the harm ("reportable suspicion"). OR	<ol style="list-style-type: none"> Notify the reportable suspicion to Child Safety Services. The report must include: <ol style="list-style-type: none"> the basis upon which you formed the reportable suspicion; the child's name and sex; the child's age; details of how to contact the child;

Subject	If	Then
	<p>You are the Headmaster, a Deputy Headmaster or the Head of Middle School and you receive notification of a reportable suspicion from a teacher or registered nurse.</p> <p>In forming a reasonable suspicion about harm to a child, you should investigate the matter and seek advice from the Chairman of the Board of Trustees and/or the School's solicitor. Have regard to section 13C of the Child Protection Act and the Child Protection Guide published by Child Safety.</p>	<ul style="list-style-type: none"> e) details of the harm to which the reportable suspicion relates; f) particulars of the identity of the person suspected of causing the child to have suffered, or suffer or be at risk of suffering, the harm to which the reportable suspicion relates; g) particulars of the identity of any other person who may be able to give information about the harm to which the reportable suspicion relates. <ol style="list-style-type: none"> 2. Keep a written record of your actions. 3. In the case of a report by a teacher or registered nurse, inform them that a report has been made to Child Safety Services.
<p>Concern that does not reach the level of a reportable suspicion (Child Protection Act s. 13B)</p> <p>Family and Child Connect (FCC) is a service which provides an identifiable and easily accessible central referral point for families and professionals to access family services.</p>	Teacher or Registered Nurse	Teacher or Registered Nurse
	<p>You are a teacher or a registered nurse and there is no reportable suspicion about a child, but you consider the child is likely to become a child in need of protection if no preventative support is given.</p>	<ol style="list-style-type: none"> 1. Notify the concern to the Headmaster, a Deputy Headmaster or the Head of Middle School. 2. Keep a written record of your actions.
	Headmaster, a Deputy Headmaster or the Head of Middle School	Headmaster, a Deputy Headmaster or the Head of Middle School
	<p>You are the Headmaster, a Deputy Headmaster or the Head of Middle School and there is no reportable suspicion about a child, but you consider, or you are informed by a teacher or registered nurse who considers, that a child is likely to become a child in need of protection if no preventative support is given.</p>	<ol style="list-style-type: none"> 1. Offer support at the School level. 2. Seek parental consent to refer to FCC and then make the referral, using the FCC- prescribed form. 3. If you are the Headmaster, you can refer a family to FCC without consent, using the FCC-prescribed form. 4. Keep a written record of your actions.

Annexure B - PROCEDURES FOR REPORTING SEXUAL ABUSE

APPLIES TO SEXUAL ABUSE FROM WITHIN AND OUTSIDE THE SCHOOL (I.E. NOT JUST TO SEXUAL ABUSE BY SCHOOL STAFF)

Subject	If	Then
<p>Reporting Sexual Abuse or Likely Sexual Abuse (Accreditation Regulation s.10; 2006 Education Act s.366 and s.366A; 2006 Education Regulation s.68)</p>	<p style="text-align: center;">Staff Member</p> <p>You are a staff member and you become aware or reasonably suspect that a student has been, or is likely to be, sexually abused by a person (irrespective of whether that person is School staff).</p>	<p style="text-align: center;">Staff Member</p> <p>Immediately provide the Headmaster or a member of the Board of Trustees with a written report about the abuse or likely abuse setting out:</p> <p>a) your name; b) the student's name and gender; c) details of the basis for your awareness or reasonable suspicion of abuse or likely abuse; d) details of the abuse or likely abuse; and e) any of the following information of which you are aware:</p> <ul style="list-style-type: none"> • the student's age; • the identity of the person who you are aware or reasonably suspect has abused or is likely to abuse the student; • the identity of any other person who may have information about the abuse or likely abuse.
	<p style="text-align: center;">Headmaster</p> <p>1. You are the Headmaster and you become aware or reasonably suspect that a student has been, or reasonably suspect that a student is likely to be, sexually abused by a person (irrespective of whether that person is School staff).</p> <p>2. You are the Headmaster and you receive a written report of sexual abuse or likely sexual abuse from a staff member.</p>	<p style="text-align: center;">Headmaster</p> <p>1. Immediately provide a Police officer and a member of the Board of Trustees with a written report about the abuse or likely abuse setting out:</p> <p>a) your name; b) the student's name and gender; c) details of the basis for your awareness or reasonable suspicion of abuse or likely abuse; d) details of the abuse or likely abuse; and e) any of the following information of which you are aware:</p> <ul style="list-style-type: none"> • the student's age; • the identity of the person who you are aware or reasonably suspect has abused or is likely to abuse the student; • the identity of any other person who may have information about the abuse or likely abuse. <p>2. Immediately give a copy of the written report which you received from a staff member to a Police officer. Keep a written record of your actions.</p>
	<p style="text-align: center;">Member of the Board of Trustees</p>	<p style="text-align: center;">Member of the Board of Trustees</p>
	<p>You are a member of the Board of Trustees and you receive a written report of sexual abuse or likely sexual abuse from a staff member.</p>	<p>Immediately give a copy of the written report which you received from a staff member to a Police officer. Keep a written record of your actions.</p>

Annexure C - PROCEDURES FOR REPORTING INAPPROPRIATE BEHAVIOUR

APPLIES TO INAPPROPRIATE BEHAVIOUR BY A STAFF MEMBER ONLY (I.E. NOT TO INAPPROPRIATE BEHAVIOUR BY SOMEONE FROM OUTSIDE THE SCHOOL)

Subject	If	Then
Reporting Inappropriate Behaviour (Accreditation Regulation s.10)	Student or Parent	Student or Parent
	You are a student or parent and you wish to report behaviour by a staff member that you consider inappropriate.	Report the behaviour to a Head of Year (HOY), a Deputy Headmaster or the Head of Middle School.
	Staff Member	Staff Member
	You are a staff member and you wish to report behaviour by another staff member that you consider inappropriate.	<ol style="list-style-type: none"> 1. Report the behaviour to a HOY, a Deputy Headmaster or Head of Middle School. 2. Keep a written record of your actions.
	Deputy Headmaster, HOY or Head of Middle School	Deputy Headmaster, HOY or Head of Middle School
You are a Deputy Headmaster, HOY or Head of Middle School and you receive a report of inappropriate behaviour from a student, parent or staff member, or you have observed inappropriate behaviour by a staff member.	<ol style="list-style-type: none"> 1. Interview the student/s involved. 2. Interview the staff member who is the subject of the report. 3. Interview any other person who may be able to provide useful information. 4. Report your findings to the Headmaster with your recommendation for any action to be taken. <ul style="list-style-type: none"> ➤ If you suspect the Headmaster is involved in the inappropriate behaviour, directly inform the School's Board of Trustees of your concern and they will take action as appropriate. <p>At all stages keep a written record of your actions.</p>	
Headmaster or Member of the Board of Trustees	Headmaster	
You are the Headmaster or a Member of the Board of Trustees and you receive a report of inappropriate behaviour from a Deputy Headmaster, HOY or Head of Middle School, or you have observed inappropriate behaviour by a staff member.	Conduct any investigation or further investigation considered necessary and take appropriate action on the basis of the findings. Keep a written record of your actions.	

Annexure D - CHILD RISK MANAGEMENT STRATEGY

1. Purpose and Application

As provided by the Working with Children Act and Regulation, the purpose of this strategy is to implement employment practices and procedures to promote the wellbeing of students and to protect students from harm.

This strategy applies to all staff, parents and students at BGS.

2. Statement of Commitment

BGS is committed to the safety and wellbeing of all students enrolled at the School and the protection of students from harm. BGS is dedicated to eliminating and minimising risks to child safety through this *Child Risk Management Strategy* which includes and refers to various other policies and procedures put in place by the School to address the safety and wellbeing of its students.

3. Implementation

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

a) Codes of Conduct

The School's *Child Protection Policy*, *Staff Code of Conduct* and the *Code of Expectations and Behaviour for Students*, outline clear standards of conduct to follow in the areas of teaching and learning, the curriculum, student wellbeing, personal conduct, attending School events, and the relationships one has with students, parents, colleagues and the School.

These codes of conduct are evidence of the School's fulfilment of the requirements of section 3(1)(b) of the Working with Children Regulation.

b) Recruitment, Selection, Training and Management Procedures

The School is committed to recruiting, selecting, training and managing staff in such a way that limits risks to children. The School's *Child Protection Policy* and *Recruitment and Selection Policy* ensure that its recruitment, selection, training and management procedures act to reduce the risk of harm to children from staff.

To reduce the risk of harm to children from staff, the School implements training and management procedures including:

- Management processes that are consistent, fair and supportive;
- Formative appraisal processes to monitor and help staff to improve their performance;
- Ensuring staff contracts require staff to comply with School policies on child protection;
- Ensuring duty statements and performance objectives address child safety as a stand alone criteria;
- Supportive processes for staff when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training, and external support and counselling services;
- An induction program which thoroughly addresses the School's policies and procedures, particularly its expectations regarding child risk management and to assist staff to understand their role in providing a safe and supportive environment for children;
- Training new and existing staff on an ongoing basis about the School's policies and procedures, identifying, assessing and minimising risks to children, and handling a disclosure or suspicion of harm to a child;

- Keeping a record of the training provided to staff;
- Exit interviews as a means to assist the School to identify any issues of concern that may impact on the safety or wellbeing of students of the School; and
- Provision of references for former staff only by a member of the School's senior leadership team. Appropriate information about any relevant child safety concerns should be made available to anyone genuinely considering a former staff member for other child related employment.

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

c) Handling Disclosures or Suspicions of Harm

The School's *Child Protection Policy* sets out policies and procedures for handling disclosures or suspicions of harm or likely harm, including reporting guidelines. This is evidence of the School's fulfilment of the requirements of section 3(1)(d) of the Working with Children Regulation.

d) Managing Breaches of this Strategy

The School is committed to appropriately managing breaches of this *Child Risk Management Strategy* in accordance with its other relevant policies as appropriate in the circumstances, such as the *Child Protection Policy*, *Sexual Harassment Policy*, *Towards a Safe and Secure Learning Environment: A Policy on Bullying*, *Anti-Discrimination Policy* and the *Staff Code of Conduct*, and this is evidence of fulfilment of the requirements of section 3(1)(e) of the Working with Children Regulation.

e) Implementing and Reviewing this Strategy

This *Child Risk Management Strategy* in its entirety and its related policies and procedures are evidence of fulfilment of the requirements of section 3(1)(f)(i) of the Working with Children Regulation relating to implementation.

The "Compliance and Monitoring" section below states the School's commitment to reviewing this *Child Risk Management Strategy* and is evidence of fulfilment of the requirements of section 3(1)(f)(i) of the Working with Children Regulation relating to review.

f) Blue Card policies and procedures

The School is committed to acting in accordance with Chapter 8 of the Working with Children Act relating to the screening of staff in such a way that limits risks to children. In particular, BGS will:

- Require relevant prospective or current staff and School Board Members to apply for a Blue Card or Exemption Notice, and check the validity and appropriateness of any currently held notices as appropriate, in accordance with the School's duty statements and the Working with Children Act;
- Complete an Authorisation to confirm a valid card application when necessary;
- Submit a Change in police notification form when notified by a staff member that such a change has occurred;
- Not allow a person to continue to work with children if their Blue Card or Exemption Notice is cancelled or suspended or a negative notice is received after a change of police information;
- Submit a 'no longer with organisation form' when appropriate;
- Appoint a school contact person who will be responsible for managing the screening process and all related documentation and records;
- Keep records of all the above actions, decisions and outcomes, including the dates of expiry of Blue Cards and Exemption Notices;
- Ensure that all information in relation to Blue Cards and Exemption Notices is kept confidential; and
- Act to remind staff to keep their Blue Card or Exemption Notice up to date.

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

g) High risk management plans

The School is committed to identifying risks, assessing risks, eliminating and minimising risks and the monitoring of risk to the safety of children on an ongoing basis, including in relation to high risk activities and special events. BGS will utilise various risk management tools to assist it in this process and will keep appropriate records of decisions made and actions taken in relation to risks to children. This commitment is evidence of the School's fulfilment of the requirements of section 3(1)(g) of the Working with Children Regulation.

h) Strategies of Communication and Support

The School's commitment to making this *Child Risk Management Strategy* available to students, parents and staff via its Staff Handbook, Website and Parent Portal is evidence of fulfilment of the requirements of section 3(1)(h)(i) of the Working with Children Regulation.

The School is committed to training staff in relation to risks to children and will conduct this training regularly via professional development at staff meetings and regular discussions between managers and their staff, and this is evidence of fulfilment of the requirements of section 3(1)(h)(ii) of the Regulation.

4. Responsibilities

The School is responsible for developing and implementing this *Child Risk Management Strategy* and related policies and procedures to ensure it fulfils its obligations. All staff are responsible for acting in compliance with this *Child Risk Management Strategy* and other School policies and procedures.

5. Compliance and Monitoring

The School is committed to review of this *Child Risk Management Strategy* at least once every two years. The School will also record, monitor and report to the School Executive and the Board of Trustees regarding any breaches of the Strategy.

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

6. Related Documents

- *Child Protection Policy*
- *Recruitment and Selection Policy*
- *Towards A Safe and Secure Learning Environment: A Policy on Bullying*
- *Sexual Harassment Policy*
- *Anti-Discrimination Policy*
- *Staff Code of Conduct*
- *Code of Expectations and Behaviour for Students*
- *Privacy Policy*