



BRISBANE GRAMMAR SCHOOL

Child Protection Policy and Child Risk Management Strategy

Version 3.1 2020-04

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1. Purpose and Application

The purpose of this *Child Protection Policy and Child Risk Management Strategy (Policy)* is to provide written processes about the appropriate conduct of Staff, parents and students of Brisbane Grammar School (**BGS** or **the School**), the mandatory reporting obligations of registered teachers and nurses, and in particular processes for:

1.1. Reporting of Harm

Students, parents and Staff members to report Harm, and for Staff members, including the Headmaster (and where appropriate, Deputy Headmaster or Head of Middle School) 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).

1.2. 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**.

1.3. 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.

Visitors to the School will also be made aware of this Policy and encouraged to report any concerns in accordance with this Policy.

The School will engage with and educate Staff, students and parents in the application of this Policy and its processes. The School seeks to create an environment where Staff, students and parents are encouraged to, and feel comfortable in, raising concerns and reporting under this Policy, but not a culture of suspicion or one that may invite vexatious complaints.

This Policy was first developed by the School in 2002 and has been and continues to be regularly (at least annually) reviewed and updated in accordance with best practice of the day and to comply with legislation applying in Queensland about the care and protection of students.

An Incident Report Form, for use by Staff when reporting Harm, Sexual Abuse or Inappropriate Behaviour, is set out in **Annexure D**.

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

The School’s Board of Trustees has approved and endorsed this Policy.



2. Legislation

The following legislation (as amended or replaced from time to time) is relevant to this Policy:

- Child Protection Act 1999 (Qld) (**Child Protection Act**)
- Child Protection Regulation 2011 (Qld) (**Child Protection Regulation**)
- Crime and Corruption Act 2001 (Qld) (**CCC Act**)
- Domestic and Family Violence Protection Act 2012 (Qld) (**DFV Protection Act**)
- Education (Accreditation of Non-State Schools) Act 2017 (Qld) (**Accreditation Act**)
- Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) (**Accreditation Regulation**)
- Education (General Provisions) Act 2006 (Qld) (**2006 Education Act**)
- Education (General Provisions) Regulation 2017 (Qld) (**2017 Education Regulation**)
- Education (Queensland College of Teachers) Act 2005 (Qld) (**QCT Act**)
- 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**)

3. Definitions

In this Policy and its Annexures:

“Child in need of protection” means a child who has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm, and does not have a parent able and willing to protect the child from the harm.

“Child Protection Committee” means the committee established to oversee the School’s implementation of and compliance with best practice regarding child safety, in consultation with the Senior Leadership Team. The Child Protection Committee is comprised of members of the School’s teaching Staff, support Staff, student and parents.

“Child Safety Services” means the Queensland Government agency for child protection services that is responsible (through the Department of Child Safety, Youth and Women) for administering the Child Protection Act.

“Domestic Violence” has the meaning given in the DFV Protection Act.

“Harm” or **“Harmed”** means 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 Abuse, 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” means behaviour of a Staff member that another Staff member, student or parent considers inappropriate, or any behaviour of a Staff member that is grooming behaviour or otherwise inconsistent with this Policy, the *Code of Conduct (Staff)* or other policies or procedures of the School.



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

“**Neglect**” occurs when a child’s basic necessities of life are not met and the child’s health and development are affected. Basic necessities of life include food, housing, health care, adequate clothing, personal hygiene, hygienic living conditions, timely provision of medical treatment and adequate supervision.

“**Physical Abuse**” occurs when a child has suffered, or is at risk of suffering, non-accidental physical trauma or injury. It may include hitting, shaking, throwing, burning, biting and poisoning.

“**Psychological or Emotional Abuse**” occurs when a child’s social, emotional, cognitive or intellectual development is impaired or threatened. It may include emotional deprivation due to persistent rejection, hostility, teasing, bullying, yelling, criticism or exposure to Domestic Violence.

A “**Respondent**” means a Staff member, 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.

“**Senior Leadership Team**” means the Headmaster, the Deputy Headmasters, the Head of Middle School, the Secretary to the Board of Trustees and Chief Financial Officer, the Executive Director - Advancement and Community Relations, and the Executive Director - Educational Innovation.

“**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, and people undertaking work experience or vocational placements or volunteers working for the School.

A “**student**” means 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 educating Staff, students and parents and ensuring accurate implementation and 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

4.1. Principles and Practices

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

- BGS will not tolerate conduct which exposes students to Harm and is committed to the rights of children and young people to feel safe and be safe when participating in the School's activities.
- Protecting students from Harm and the risk of Harm including Sexual Abuse or Inappropriate Behaviour is fundamental to maximising their personal and academic potential.
- All Staff have a critical role to play in the prevention of Harm to any student, not just in the detection of it and response.
- 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.
- All Staff of the School must ensure that their behaviour towards and relationship with students reflect the highest standards of care for students, and is 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, or Inappropriate Behaviour.
- BGS seeks to create an environment where raising concerns is an ordinary professional responsibility and reprisals against Staff members or others making a report under this Policy will not be tolerated.
- The need to protect students must override any natural tendencies in the workplace to protect colleagues from adverse circumstances.
- BGS will act fairly and reasonably towards both the student who has been or is suspected of having been Harmed or at risk of Harm, or the subject of Inappropriate Behaviour, 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, or the subject of Inappropriate Behaviour, 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, or the subject of Inappropriate Behaviour, must report it in accordance with the School's reporting procedures (refer to the **Annexures** to this Policy).
- BGS will report as required and take appropriate disciplinary action against any member of the School's Staff who Harms a student or engages in Inappropriate Behaviour.
- 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.



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- BGS will cooperate with external authorities as appropriate, including the Police and Child Safety Services, to address allegations of Harm or Inappropriate Behaviour.
- BGS promotes and respects the rights of its students to be heard, protected and supported, and the rights of students and their families to have their concerns resolved.
- BGS is committed to equity and diversity and respects and promotes the rights of students to participate in decision making, noting the particular needs of students who are Aboriginal or Torres Strait Islander, have a disability, are from culturally or linguistically diverse backgrounds, identify as LGBTI, or are unable to live at home.

4.2. Procedural fairness

The following principles will govern the application of this Policy:

- That those making a decision are not biased.
- That any Staff members against whom allegations are made are informed of the allegations and that no adverse action is taken against a person unless the person is given prior notice of the allegations against them and they have a fair opportunity to respond. However, the School may suspend a Staff member from their duties, on full pay if the role is paid.

The School will ensure the processes for reporting under this Policy are simple and easily accessible.

4.3. 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 taken under this Policy and to produce documents.

The School may provide information to Staff, students and parents about matters dealt with under this Policy. The extent of any such disclosure will be determined on a case by case basis by the Headmaster, in consultation with the Board of Trustees and the School's solicitors. Where the Police are involved, the School will engage with them to ascertain the limits of information that the School is permitted to disseminate.

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

The Headmaster, or member of the Board of Trustees if applicable, will:

- Report on matters dealt with under this Policy to the Board of Trustees; and
- Take appropriate steps to follow up matters dealt with under this Policy (for example, if a warning is given to a Staff member, to make enquiries about whether the behaviour in question has in fact ceased).



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4.4. Crime and Corruption Commission

To the extent that BGS is subject to the CCC Act, it may be necessary for BGS to also advise the Crime and Corruption Commission of matters dealt with under this Policy. The obligation to do so must be assessed by the School on a case by case basis.

4.5. 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, a member of the Board of Trustees or a Police officer) is generally excused from liability for defamation.

4.6. 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, a member of the Board of Trustees or a Police officer).

4.7. Promptness

All steps under this Policy must be carried out as promptly as reasonably possible in the circumstances.

4.8. Preventing Harm

In order to reduce the risk of any Harm occurring, the Headmaster, Deputy Headmaster – Students and the Head of Middle School will implement the *Child Risk Management Strategy* in **Annexure E** to this Policy, and the *Recruitment and Selection Policy*, including procedures to ensure the following:

- Each Staff member understands the rationale for and fulfils their obligations under this Policy.
- The School obtains acceptable references for each Staff member engaged since the commencement of this Policy, including from their 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.

4.9. Professional Behaviour and Situational Factors

The professional standards required of Staff are set out in detail in the *Code of Conduct (Staff)* and outline the standards of professional behaviour which potentially impact upon compliance with this Policy, including:

- Treating students consistently and without inappropriate familiarity;
- Exercising caution about being alone with students; and
- Ensuring appropriate physical contact with students.

The School also provides a *Behaviour Management Policy (For Teachers)* and a *Behaviour Management Policy (For Students and Parents)*.



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Staff must remember the School is a heritage site, which was not originally designed with modern child protection safeguards in mind, such as good natural / line of sight surveillance. Some Staff will work with students in more isolated settings such as at Lake Moogerah, the Northgate Playing Fields and on the Tennis Courts. Ensuring vigilance and appropriate supervision in such contexts is important.

4.10. Support

The School will provide support for both a student who has been or is suspected of having been Harmed or at risk of Harm, or the subject of Inappropriate Behaviour, 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.

4.11. 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.

4.12. 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 and when required to do so under the QCT Act or other applicable legislation.

4.13. 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 Headmaster on a case by case basis, in consultation with the Board of Trustees and after taking legal or other expert advice if necessary.

4.14. Insurer

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

4.15. Implementation of this Policy

The Headmaster, Deputy Headmaster – Students and the Head of Middle School will ensure members of the School community are made aware of and can readily access this Policy in accordance with the *Child Risk Management Strategy* in **Annexure E** to this Policy, including that:

- 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;
- At least once each year the Policy is discussed in School Assemblies and weekly Newsletters;
- The Policy is included annually in the student wellbeing curriculum for students; and
- The Policy is published on the School's website and a hard copy of this Policy is always available from the School's Administration.



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The Headmaster, Deputy Headmaster – Students and the Head of Middle School will also ensure that:

- The School is implementing the processes under this Policy;
- The School publishes brochures explaining the Policy to occasional staff including volunteers, parents, students, visitors and with respect to boarding;
- The School publishes guidance material for Staff regarding reporting procedures under this Policy;
- Staff receive induction and annual refresher training, utilising external expertise where needed, in relation to child protection, including implementing the processes under this Policy;
- The Child Protection Committee is established and appropriately resourced and supported in performing its functions.

4.16. Review of this Policy

The School will ensure that this Policy is reviewed at least annually or more frequently if required to respond to legislative changes.

4.17. Complaints

Any concerns in respect of non-compliance with the School's processes set out in this Policy should be dealt with under the *Complaints Policy (Staff)* or *Complaints Policy (Parents and Students)*

5. 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 the:

- *Bullying Policy*;
- *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 *Code of Conduct (Staff)* 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.



6. Indicators of Harm including Sexual Abuse

It is often the case that students are Harmed by someone they know and trust – a parent, sibling, other relative, family friend, care provider or person involved in community. Staff members and parents should be aware of the possible physical, emotional and behavioural indicators of risk of student Harm, and actual Harm. The indicators are more significant if they are severe or consistent over time. It is important that Staff and parents understand signs of potential abuse.

6.1. 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 they have 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.

Psychological or Emotional Abuse and/or deprivation

- Poor peer relationships/withdrawn/anxious;
- Inclined to seek adult company and/or students who are older or younger;
- Regularly avoiding going home;
- Learning difficulties, including poor concentration;
- Attention-seeking behaviour such as stealing, lying, running away, or repeatedly disrupting classes;
- Social withdrawal including disengagement from School and School activities;
- Declining or underperformance in educational outcomes; and
- Engaging in risk taking behaviour.

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;



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- Itching, soreness, discharge or unexplained bleeding;
- Painful and recurrent urination;
- Recurrent urinary tract infections;
- Signs of sexually transmitted diseases; and
- Other indicators of Harm as listed above.

Grooming

To aid prevention of Sexual Abuse, and because indicators of Harm will not always be present, it is also important for Staff to be aware of the types of behaviours that can be used in the process of 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 their 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 is Sexual Abuse, or Inappropriate Behaviour.

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

It is important to be aware of the types of behaviours that can be used in the process of grooming 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 acknowledgment of potential conflicts of interest is a vital part of the protection of children and of the Staff members themselves. This is particularly important in school settings where a Staff member’s role entails close and sometimes extended physical, emotional and/or psychological involvement with students (e.g. coaching, instruction, counselling and pastoral care).

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 co-curricular activities;
- Giving gifts to or doing favours for the student;
- Sharing secrets with the student;



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- 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.

There are no precise rules to determine what behaviour is of concern. Some behaviour may be ambiguous taking account of the people involved and the context. If in doubt, Staff and parents are strongly encouraged to discuss any issues or concerns with a Head of Year, School Counsellor or member of the School's Senior Leadership Team.

Everyone should feel free to raise even minor matters, which will assist in small pieces of information being "built up" over time and acted upon where necessary. The School does not wish for anyone to be left on their own in judging whether and how to voice concerns.

As well as educating its Staff, the School will disseminate information about "grooming" and its potential role in Sexual Abuse to parents and seek to engage them in a collective effort to prevent any abuse occurring. If grooming can be detected at an early stage, the behaviour can be stopped before any harm is done.

7. Processes for Reporting Harm including Sexual Abuse and Inappropriate Behaviour

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. This applies to harm from within and outside the School (i.e. not just to Harm caused by Staff).

Annexure B to this Policy outlines the School's *Procedures for Reporting Sexual Abuse* which must be followed without exception. This applies to Sexual Abuse from within and outside the School (i.e. not just to Sexual Abuse by Staff).

Annexure C to this Policy outlines the School's *Procedures for Reporting Inappropriate Behaviour* which must be followed without exception. This applies to Inappropriate Behaviour by a Staff member (i.e. does not include Inappropriate Behaviour by someone outside the School).

Failure by any Staff member to comply with their reporting obligations as set out in **Annexures A, B and C** to this Policy constitutes serious misconduct and, will lead to disciplinary action by the School, which may include dismissal.

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



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that a student has been Harmed, or is at risk of Harm, or Inappropriate Behaviour. A Staff member is not obliged to obtain proof, establish the cause of the Harm or risk of Harm, or Inappropriate Behaviour, or assess its severity. Staff members are encouraged to speak with a member of the School's Senior Leadership Team if unsure whether a matter should be reported under this Policy. Staff should be aware of indicators of Harm and understand what is grooming behaviour, as set out in this Policy.

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.

The following guidelines are to assist senior Staff members in any cases involving Harm or reasonably suspected or likely Harm of a student, or Inappropriate Behaviour:

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, or the subject of Inappropriate Behaviour, 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. Consult with the Board of Trustees and take legal or other expert advice about managing a report of Harm or Inappropriate Behaviour, as and when necessary.
4. If the Respondent is a Staff member and there is unacceptable risk, suspend the Respondent from their duties, on full pay if the Respondent's role is paid. In extreme and unequivocal cases, the Respondent may be dismissed summarily.
5. If the Respondent is a Staff member, provide details of the allegations in writing to the Respondent and request a written response.
6. Inform the student's parents unless circumstances suggest it would not be in the student's best interests to do so.
7. Inform the Board of Trustees.
8. Attend to public relations.
9. Keep the student, their parents and the Respondent informed as appropriate as the matter proceeds.

7.1. 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.



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7.2. 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 or is at risk of Harm, or the subject of Inappropriate Behaviour, 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 confidentially as far as is practicable; and
- Immediately notify the Headmaster, Deputy Headmaster – Students or the Head of Middle School 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. Parents will be advised of confidential external agencies which may be able to assist them, such as "Parentline".

7.3. Educating Students

The School provides education on child protection matters to all students as part of its student wellbeing curriculum. The School's Student Wellbeing Team takes an active role in the wellbeing of all students, including providing professional counselling. Students will also be advised of confidential external agencies which may be able to assist them in processing any concerns they may have and steps to report them, such as "Kids Helpline".

7.4. Mandatory reporting obligations (teacher and registered nurse for a "reportable suspicion" and all Staff for Sexual Abuse)

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 Chapter 2, Part 1AA, Division 2 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:²

- Has suffered, is suffering or is at unacceptable risk of suffering, significant Harm caused by Physical Abuse or Sexual Abuse; and
- May not have a parent able and willing to protect 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 may confer with a colleague (such as the Headmaster, or a member of the Senior Leadership Team) and share information for particular purposes, including for the purposes of forming a reportable suspicion, making a report and keeping a record of it, and for the

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

² Section 13E(2) of the Child Protection Act.



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Headmaster to take appropriate action to deal with the suspected Harm or risk of Harm.³ See **Annexure A** of this Policy.

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.⁴ If a teacher or registered nurse forms a “reportable suspicion” and does not know or cannot reasonably suppose that Child Safety Services is aware of the matter, then the teacher or registered nurse should follow the procedure in **Annexure A** of this Policy.

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.

8. 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 medical condition or intellectual disability.

8.1. 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.

³ Section 13H of the Child Protection Act.

⁴ Section 13G of the Child Protection Act.



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8.2. Self-harm Without Suicidal Intent

Not all cases of self-harm involve 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 programs to assist students to make appropriate choices in relation to drug and alcohol use and sexual activity. Refer to the *Drugs Policy*.

8.3. Reporting Student Self-harm

A risk of self-harm or actual self-harm by a student must be taken seriously and reported and managed in accordance with this Policy.

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

- Ensure the immediate safety of the student;
- Arrange for an adult to be with the student at all times;
- Consider whether any other student requires support; and
- Report the Harm or reasonably suspected Harm in accordance with this Policy.

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, Deputy Headmaster - Students or Head of Middle School, will notify the student's parents where appropriate and make arrangements for access to professional assistance.

8.4. 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 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 program of management to prevent or reduce the likelihood of the student engaging in self-harm while participating in the School's activities.

The program 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.



9. Related Documents

- Child Risk Management Strategy (**Annexure E**)
- Operational Procedures for Responding to Students at Risk of Self-Harm (internal School procedure for staff)
- Procedures for Reporting Harm – Staff Member (internal School guidance material for Staff)
- Child Protection Fact Sheet: Creating A Safe School Environment – Parents
- Child Protection Fact Sheet: Creating A Safe School Environment - Students
- Child Protection Fact Sheet: Creating A Safe School Environment – Visitors
- Child Protection Fact Sheet: Creating A Safe School Environment – Boarding Students
- Child Protection Fact Sheet: Creating A Safe School Environment – Boarding Parents
- Child Protection Fact Sheet: Creating A Safe School Environment – Occasional Staff including Volunteers
- Anti-Discrimination Policy
- Behaviour Management Policy (For Students and Parents)
- Behaviour Management Policy (For Teachers)
- Bullying Policy
- Code of Conduct (Staff)
- Code of Expectations and Behaviour (Students)
- Complaints Policy (Parents and Students)
- Complaints Policy (Staff)
- Counselling Policy Practices and Procedures
- Drugs Policy
- Explicit Sexual Material Policy
- Privacy Policy and Standard Information Collection Notice
- Recruitment and Selection Policy
- Sexual Harassment Policy
- Social Media Policy

10. Contact Information

If you have any questions regarding this document, please contact:

- Deputy Headmaster – Students, via dhm.students@brisbanegrammar.com or 07 3834 5200
- Head of Middle School, via head.ms@brisbanegrammar.com or 3834 5301
- Blue Card Services (Department of Justice and Attorney-General), via 07 3211 6999 or 1800 113 611
- Queensland College of Teachers, via 07 3377 4777
- Police (Brisbane City North), via 07 3364 6464
- Child Safety Services (Department of Communities) Brisbane Regional Intake Services, via 1300 682 254
- Child Safety After Hours Service Centre, via 1800 177 135
- Family and Child Connect, via 13 32 64
- Kids Helpline, via 1800 55 1800
- Parentline, via 1300 30 1300



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11. Policy Management

Document Title	Child Protection Policy and Child Risk Management Strategy
Author	David Carroll, Deputy Headmaster – Students
Version	V3.1 2020-04
Date	15 April 2020

Document Control

Version	Description	Date
V1.0	H. Stack (Chairman), A. Micallef (DHM-Students), D. Abernethy (Solicitor), Kerryn Hurd (School Counsellor)	2007
V1.10	A. Micallef (DHM – Students) J. Zervos (Head of Middle School)	8 Feb 2010
V1.20	D. Abernethy (Solicitor) G. North (Solicitor) A. Micallef (DHM-Students)	30 Apr 2012
V1.30	D. Abernethy (Solicitor) G. North (Solicitor) A. Micallef (DHM-Students)	Mar 2013
V1.40	L Dorricott (Solicitor), A Micallef (Headmaster)	Sep 2014
V1.50	L Dorricott (Solicitor), A Micallef (Headmaster)	Jan 2015
V1.60	A Micallef (Headmaster), D Abernethy (Solicitor), L Dorricott (Solicitor)	May 2015
V1.70	A Micallef (Headmaster), D Abernethy (Solicitor), L Dorricott (Solicitor)	Jul 2015
V1.80	H Stack (Chairman), A Micallef (Headmaster), D Abernethy (Solicitor), L Dorricott (Solicitor)	Nov 2015
V1.90	E Roper (Deputy Headmaster – Staff), D Abernethy (Solicitor), L Dorricott (Solicitor) 3456-0067-4823	Jan 2018
V1.91	Standardize format – L Dunstan	26 Mar 2018
V2.0	Policy Review - L Dorricott (Solicitor, CCW 3464-6277-5306), David Carroll (Deputy Headmaster – Students)	22 May 2018
V3.0	Policy Review - Corrs Chambers Westgarth (CCW 3445-9447-1693), David Carroll (Deputy Headmaster – Students)	30 Aug 2019
V3.0	Reviewed by SLT	26 Nov 2019
V3.0	Approved: Deputy Headmaster – Students, D Carroll	4 Mar 2020
V3.1	Policy Review - Corrs Chambers Westgarth (CCW 3451-2821-4287), David Carroll (Deputy Headmaster – Students)	3 Apr 2020

Distribution

Version	Recipient	Date
V1.20	Board of Trustees	10 May 2012
V1.20	BGS (MyGrammar)	3 Jun 2012
V1.20	BGS Staff Announcement – Staff PD Day	16 Jul 2012
V1.70	Board of Trustees	13 Aug 2015
V1.80	Board of Trustees	3 Dec 2015
V1.80	BGS (My Grammar)	7 Dec 2016
V1.80	BGS Staff Announcement – Staff PD Day	18 Jan 2016
V1.90	Board of Trustees	8 Feb 2018
V1.91	BGS (MyGrammar) \ BGS Staff Announcement	26 Mar 2018
V2.0	BGS Staff Announcement	22 May 2018
V3.0	BGS (MyGrammar) BGS Staff Announcement	6 Mar 2020
V3.1	BGS (MyGrammar) BGS Staff Announcement	15 Apr 2020



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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 or suspected Harm (not limited to Harm caused by Physical Abuse or Sexual Abuse) (Accreditation Regulation s.16)	Student or Parent	Student or Parent
	You are a student or parent and you are aware or reasonably suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering, Harm.	Report the Harm or reasonably suspected Harm to any Staff member.
	Staff Member who is not a teacher or Registered Nurse	Staff Member
	You are a Staff member and you are aware or reasonably suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering, Harm. OR You are a Staff member and you receive a report from a student or parent regarding Harm to a student.	<ol style="list-style-type: none"> 1. Report the Harm or suspected Harm to a Deputy Headmaster, the Head of Middle School or the Headmaster using the Incident Report Form at Annexure D. 2. Keep a written record of your actions.
	Teacher (including Headmaster, a Deputy Headmaster or the Head of Middle School) or Registered Nurse	Teacher (including Headmaster, a Deputy Headmaster or the Head of Middle School)
You are a teacher (including Headmaster, a Deputy Headmaster or the Head of Middle School) or Registered Nurse and you are aware or reasonably suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering, Harm. 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 regarding Harm to a student.	Take the steps set out in the sections "Reporting a reportable suspicion of harm" or "Concern that does not reach the level of a reportable suspicion" below (as applicable).	
Reporting a reportable suspicion of Harm (Child Protection Act ss. 13B(1), 13C, 13E and 13G; 13H and 13I; Child Protection Regulation s.10)	Teacher (including Headmaster, Deputy Headmaster or the Head of Middle School) or Registered Nurse	Teacher (including Headmaster, Deputy Headmaster or the Head of Middle School) 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 Abuse or Sexual Abuse; and • may not have a parent able and willing to protect the child from the Harm (Together, a "reportable suspicion"). In forming a reasonable suspicion about Harm to a child, you may confer with a colleague (such as the Headmaster, or, if you are the Headmaster, the Chairman of the Board of Trustees). Have regard to section 13C of the Child Protection Act and the Child Protection Guide published by Child Safety Services.	<ol style="list-style-type: none"> 1. If you are a teacher (who is not the Headmaster) or a registered nurse, you MUST either: <ol style="list-style-type: none"> a) Notify the reportable suspicion to Child Safety Services directly; or b) Using the Incident Report Form at Annexure D, give information to the Headmaster, Deputy Headmaster – Students or Head of Middle School to enable the Headmaster to notify the reportable suspicion to Child Safety Services and satisfy yourself that the Headmaster has made the notification. 2. If you are the Headmaster and: <ol style="list-style-type: none"> a) you receive information from a



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Subject	If	Then
		<p>teacher or registered nurse about a reportable suspicion; or</p> <p>b) you have formed a reportable suspicion, then</p> <p>you must notify the reportable suspicion to Child Safety Services (and, if relevant, provide written confirmation to the teacher or registered nurse who provided you with information about the reportable suspicion).</p> <p>3. The report to Child Safety Services must include:</p> <p>a) the basis upon which you formed the reportable suspicion;</p> <p>b) the child's name and sex;</p> <p>c) the child's age;</p> <p>d) details of how to contact the child (for example, the child's address and the School's address);</p> <p>e) details of the Harm to which the reportable suspicion relates;</p> <p>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;</p> <p>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.</p> <p>4. Keep a written record of your actions.</p>
<p>Concern that does not reach the level of a reportable suspicion (Child Protection Act ss. 13A, 13B(2), 159MD)</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>	<p style="text-align: center;">Teacher or Registered Nurse</p> <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>	<p style="text-align: center;">Teacher or Registered Nurse</p> <p>1. Notify the concern to the Headmaster, a Deputy Headmaster or the Head of Middle School using the Incident Report Form at Annexure D.</p> <p>2. Keep a written record of your actions.</p>
	<p style="text-align: center;">Headmaster, a Deputy Headmaster or the Head of Middle School</p> <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>	<p style="text-align: center;">Headmaster, a Deputy Headmaster or the Head of Middle School</p> <p>1. Offer support at the School level.</p> <p>2. Seek parental consent to refer to FCC and then make the referral, using the FCC- prescribed form.</p> <p>3. If you are the Headmaster, you can refer a family to FCC without consent, using the FCC-prescribed form.</p> <p>4. You may choose to notify Child Safety Services even if you do not have a "reportable suspicion".</p> <p>5. Keep a written record of your actions. Report to the Board and follow up as necessary.</p>



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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
Reporting Sexual Abuse or Likely Sexual Abuse (Accreditation Regulation s.10; 2006 Education Act s.366 and s.366A; 2017 Education Regulation s.68 and s. 69)	Staff Member	Staff Member
	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).	Immediately provide the Headmaster, Deputy Headmaster – Students, Head of Middle School or a member of the Board of Trustees with a written report about the abuse or likely abuse setting out: <ol style="list-style-type: none"> a) your name; b) the student’s name and sex; 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: <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. To do so, use the Incident Report Form at Annexure D .
	Headmaster	Headmaster
	<ol style="list-style-type: none"> 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 style="text-align: center;">OR</p> <ol style="list-style-type: none"> 2. You are the Headmaster and you receive a written report of Sexual Abuse or likely Sexual Abuse from a Staff member. 	<ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> a) your name; b) the student’s name and sex; 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: <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. 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. Report to the Board and follow up as necessary.
Member of the Board of Trustees	Member of the Board of Trustees	
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.	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. Report to the Board and follow up as necessary.	



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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.16)	Student or Parent	Student or Parent
	You are a student or parent and you wish to report Inappropriate Behaviour by a Staff member.	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 Inappropriate Behaviour by another Staff member.	<ol style="list-style-type: none"> 1. Report the behaviour to a HoY, a Deputy Headmaster or Head of Middle School using the Incident Report Form at Annexure D. 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. 5. At all stages keep a written record of your actions.
Headmaster or Member of the Board of Trustees	Headmaster or Member of the Board of Trustees	
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. Report to the Board and follow up as necessary.	



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Annexure D - INCIDENT REPORT FORM

This form is for use by all Staff when reporting Harm, Sexual Abuse or Inappropriate Behaviour.

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

INCIDENT REPORT	
Section 1: Details of person preparing report	
Full name	
Staff number	
Position title	
Type of Staff member (tick the option that applies)	<input type="checkbox"/> I am Staff member <i>other than</i> a teacher or registered nurse (go to section 2) <input type="checkbox"/> I am Staff member who is a teacher or registered nurse (go to section 2A)
Section 2: Reason for making report (Only complete if you are a Staff member other than a teacher or registered nurse)	
Why are you making this report?	<input type="checkbox"/> I am aware or reasonably suspect that a child has suffered, is suffering, or is at unacceptable risk of suffering, Harm <input type="checkbox"/> I have received a report from a student or parent regarding Harm to a student <input type="checkbox"/> I am aware or reasonably suspect that a student has been, or is likely to be, Sexually Abused by a person <input type="checkbox"/> I wish to report Inappropriate Behaviour by another Staff member
Section 2A: Reason for making report (Only complete if you are a Staff member who is a teacher or registered nurse)	
Why are you making this report?	<input type="checkbox"/> I have a reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering, significant Harm caused by Physical Abuse or Sexual Abuse, and may not have a parent able and willing to protect them from the Harm (a reportable suspicion) <input type="checkbox"/> I do not have a reportable suspicion, but consider that a child is likely to become a "child in need of protection" if no preventative support is given <input type="checkbox"/> I am aware or reasonably suspect that a student has been, or is likely to be, Sexually Abused by a person <input type="checkbox"/> I wish to report Inappropriate Behaviour by another Staff member
Section 3: Details of affected child	
Child's name	
Child's age	
Child's sex	
Child's grade/class	
Child's contact details (e.g. the child's address)	



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Section 4: Details of alleged Harm, Sexual Abuse or Inappropriate Behaviour	
Date(s) of Harm, Sexual Abuse or Inappropriate Behaviour	
Person(s) who may have caused the Harm or engaged in Sexual Abuse or Inappropriate Behaviour	
Details of the Harm, Sexual Abuse or Inappropriate Behaviour (include as much information as possible)	
<i>For teachers and registered nurses only:</i> If you have a reportable suspicion, on what basis did you form that suspicion?	
<i>For teachers and registered nurses only:</i> If you are aware of or reasonably suspect Sexual Abuse or likely Sexual Abuse, on what basis did you form that awareness or suspicion?	
Are there any other persons who may be able to give information about the Harm, Sexual Abuse or Inappropriate Behaviour?	
Section 5: Actions taken	
Have you taken any action to date in relation to the matter apart from this report?	
Section 6: Date of report	
Date report prepared	



Annexure E - CHILD RISK MANAGEMENT STRATEGY

1. Purpose and Application

As provided by the Working with Children Act⁵ and Regulation⁶, 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 and Child Risk Management Strategy*, *Code of Conduct (Staff)* and the *Code of Expectations and Behaviour (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. The School also provides a *Behaviour Management Policy (For Teachers)* and a *Behaviour Management Policy (For Students and Parents)*.

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 Child Risk Management Strategy* 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:

⁵ Sections 171 and 172.

⁶ Section 3.



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- Management processes that are consistent, fair and supportive, and provide an appropriate level of supervision;
- 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 the rationale for and their role in providing a safe and supportive environment for children;
- Training new and existing Staff on an ongoing basis and at least annually 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 or Inappropriate Behaviour**

The School's *Child Protection Policy and Child Risk Management Strategy* sets out policies and procedures for handling disclosures or suspicions of Harm or likely Harm, or Inappropriate Behaviour, 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 and Child Risk Management Strategy*, *Sexual Harassment Policy*, *Bullying Policy*, *Anti-Discrimination Policy* and the *Code of Conduct (Staff)*, *Complaints Policy (Staff)* and *Complaints Policy (Parents and Students)*.

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.



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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.

The School acknowledges that “best practice” in relation to child protection is a continual process and that the School’s approach will need to be monitored and developed as appropriate.

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;
- Comply with all reporting and notification requirements arising under the Working with Children Act; 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 Website and Parent Portal is



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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. Such training will (amongst other things) aim to help Staff identify risks of Harm and how to handle disclosures or suspicions of Harm, and outline this *Child Risk Management Strategy*.

The School is also committed to educating students and parents about these issues, and creating an environment which encourages students to raise concerns they may have for themselves, or others, relating to Harm or Inappropriate Behaviour. The Child Protection Committee is also established and appropriately resourced and supported in performing its functions.

This is evidence of fulfilment of the requirements of section 3(1)(h)(ii) of the Working with Children 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 will review this *Child Risk Management Strategy* at least annually (or more frequently if required) to respond to legislative changes. The School will also promptly record, monitor and report to the Senior Leadership Team and the Board of Trustees regarding any breaches of the Strategy.

In addition, the School, as part of further actions resulting from the auditing of the School's policy and protocols against the outcomes of the Royal Commission – Child Safe Institutions report will develop a process of review of each adverse event. It will include a team of key stakeholders reviewing the adverse event with a view to identifying what can be learned from the event and if necessary, implementing necessary changes to current policy and procedures as a result. This action will be part of a generated list of tasks to be addressed by the Child Protection Committee.

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



6. Related Documents

- Child Protection Policy and Child Risk Management Strategy
- Operational Procedures for Responding to Students at Risk of Self-Harm (internal School procedure for staff)
- Procedures for Reporting Harm – Staff Member (internal School guidance material for Staff)
- Child Protection Fact Sheet: Creating A Safe School Environment – Parents
- Child Protection Fact Sheet: Creating A Safe School Environment - Students
- Child Protection Fact Sheet: Creating A Safe School Environment – Visitors
- Child Protection Fact Sheet: Creating A Safe School Environment – Boarding Students
- Child Protection Fact Sheet: Creating A Safe School Environment – Boarding Parents
- Child Protection Fact Sheet: Creating A Safe School Environment – Occasional Staff including Volunteers
- Anti-Discrimination Policy
- Behaviour Management Policy (For Students and Parents)
- Behaviour Management Policy (For Teachers)
- Bullying Policy
- Code of Conduct (Staff)
- Code of Expectations and Behaviour (Students)
- Complaints Policy (Parents and Students)
- Complaints Policy (Staff)
- Counselling Policy Practices and Procedures
- Drugs Policy
- Explicit Sexual Material Policy
- Privacy Policy and Standard Information Collection Notice
- Recruitment and Selection Policy
- Sexual Harassment Policy
- Social Media Policy