



Child Risk Management Strategy

Status:	Current	Supersedes: All previous Rockhampton Girls Grammar School Child Risk Management Strategy policies
Authorised by:	Chair of Board of Trustees	Date of Authorisation: March 2023
References:	<ul style="list-style-type: none"> • <u><i>Working with Children (Risk Management and Screening) Act 2000 (Qld)</i></u> • <u><i>Working with Children (Risk Management and Screening) Regulation 2020 (Qld)</i></u> • <u><i>Child Protection Act 1999 (Qld)</i></u> • <u><i>Education (Accreditation of Non-State Schools) Act 2017 (Qld)</i></u> • <u><i>Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)</i></u> • <u><i>Education (General Provisions) Act 2006 (Qld)</i></u> • <u><i>Education (General Provisions) Regulation 2017 (Qld)</i></u> • <u><i>Education Services for Overseas Students (ESOS) Act 2000 (Cth)</i></u> • <u><i>Education (Overseas Students) Regulation 2014 (Qld)</i></u> • <u><i>Education (Queensland College of Teachers) Act 2005 (Qld)</i></u> • <u><i>Education and Care Services National Law (Queensland)</i></u> • <u><i>Education and Care Services National Regulations</i></u> • <u><i>Criminal Code Act 1899 (Qld)</i></u> • <u><i>Blue Card Services Child and Youth Risk Management Strategy Toolkit</i></u> • <u><i>Rockhampton Girls Grammar School Blue Card Register</i></u> • <u><i>RGGS-058-POL-CHILD PROTECTION POLICY</i></u> • <u><i>RGGS-059-GDL-CHILD PROTECTION GUIDELINES</i></u> • <u><i>RGGS-009-POL-COMPLAINTS HANDLING POLICY</i></u> • <u><i>RGGS-037-POL-STAFF CODE OF CONDUCT</i></u> • <u><i>RGGS-016-POL PARENT AND VISITOR CODE OF CONDUCT</i></u> • <u><i>RGGS-081-FRM-RESTRICTED PERSON DECLARATION FORM</i></u> 	
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1. PURPOSE OF THE STRATEGY

The purpose of this strategy is to eliminate and minimise risk to student safety and to implement employment practices and procedures to promote the safety and wellbeing of all students at Rockhampton Girls Grammar School and protect students from harm.

2. SCOPE

The Child Risk Management Strategy (Strategy) applies to all students, parents and staff including full-time, part-time, permanent, fixed-term and casual employees as well as contractors, volunteers and people undertaking work experience or vocational placements at the School (Staff), and the Board of Trustees of Rockhampton Girls Grammar School (Board).

3. STATEMENT OF COMMITMENT

Rockhampton Girls Grammar School (the School) is committed to the safety and wellbeing of students enrolled at the School and their protection from foreseeable harm.¹ In practice, the School is committed to implementing the Child Protection Policy, acting in accordance with the *Working with Children (Risk Management and Screening) Act 2000 (Qld)* (the Act) and promoting the safety and wellbeing of students by implementing the measures outlined in this Strategy.

4. CODE OF CONDUCT

At Rockhampton Girls Grammar School, we expect our staff, parents and visitors to always behave in ways that promote the safety, welfare and well-being of our students. They must actively seek to prevent harm to children and young people, and to support those who have been harmed.

This Strategy, the School's ***RGGS-058-POL CHILD PROTECTION POLICY, RGGS-016-POL PARENT AND VISITOR CODE OF CONDUCT***, and ***RGGS-037-POL STAFF CODE OF CONDUCT*** outline clear standards of behaviour that staff, parents and visitors must follow in the areas of teaching and learning, the curriculum, student wellbeing, personal conduct, attendance at School events, and the relationships one has with students, parents, colleagues and the School.

This commitment is evidence of fulfillment of the requirements of schedule 1, s.2 (2) of the *Working with Children (Risk Management and Screening) Regulation 2020 (Qld)* (Working with Children Regulation).

5. RECRUITMENT, SELECTION, TRAINING AND MANAGEMENT PROCEDURES

Rockhampton Girls Grammar School is committed to recruiting, selecting, training and managing employees in such a way that limits risks to students. In particular, the School will:

- ensure that its recruitment and selection procedures act to reduce the risk of harm to children from Staff via:
 - accurate position descriptions, including whether the successful applicant must be a teacher registered with the Queensland College of Teachers (who has been subject to relevant police and other safety checks), whether a Blue Card is necessary for the successful applicant, the responsibilities and supervision associated with the position, the nature and environment of the service provided to students, and the experience and qualifications required by the successful applicant

¹ 1 Working with Children (Risk Management and Screening) Regulation 2020 (Qld) sch 1 s.2(1)
RGGS-060-POL-CHILD RISK MANAGEMENT STRATEGY



- advertising positions with a clear statement about the School's commitment to child protection and identifying that candidates will be subject to a teacher registration check or Blue Card screening, referee checks, identification verification, police check (if appropriate) and the requirement to disclose any information relevant to the candidate's eligibility to engage in activities involving children.
- a selection process that includes assessing the application via an interview and referee and other checks (as identified above) based on the accurate position description
- at least two referee checks for all new staff, including the candidate's most recent manager and/or Principal. The School reserves the right to contact persons other than those nominated as referees with permission from the candidate, and
- a probationary period of employment, which allows the School to further assess the suitability of the new employee and to act as a check on the selection process.
- ensure that its training and management procedures act to reduce the risk of harm to students from Staff via:
 - management processes that are consistent, fair and supportive
 - an induction program which thoroughly addresses the School's policies and procedures, particularly its expectations regarding student risk management and to assist Staff to understand their role in providing a safe and supportive environment for students
 - training new and existing staff on an ongoing basis to enhance skills and knowledge and to reduce exposure to risks, as follows:
 - the School's policies and procedures
 - identifying, assessing and minimising risks to students, and
 - handling a disclosure or suspicion of harm to a child
 - keeping a record of the training provided to Staff
 - performance management processes that help Staff improve their performance in a positive manner
 - supportive processes for Staff when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training, and the provision of external support and counselling services, and
 - exit interviews to assist the School to identify broader issues of concern that may impact on the safety and wellbeing of students at the School.

This commitment is evidence of the School's fulfilment of the requirements of Schedule 1 s.2(3) of the Working with Children Regulation.

6. HANDLING DISCLOSURES OR SUSPICIONS OF HARM

The School's **RGGS-058-POL CHILD PROTECTION POLICY** sets out policies and procedures for handling disclosures or suspicions of harm, or inappropriate behaviour of a staff member, including reporting guidelines.

Such policies and procedures apply to students and Staff, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements at Rockhampton Girls Grammar School. Any of the types of concerns or reports below should be reported and managed under Rockhampton Girls Grammar School's **RGGS-058-POL CHILD PROTECTION POLICY** and the **RGGS-059-GDL CHILD PROTECTION GUIDELINES**:

- staff concerns about sexual abuse or likely sexual abuse or a child sexual offence committed by an adult
- teachers, nurses and early childhood education and care professionals with concerns about sexual or physical abuse
- all staff who have received a report of inappropriate behaviour by another staff member.

To report any type of harm, all staff members should use the *Report of Suspected Harm or Sexual Abuse Form* in Appendix 2 of this document.



Furthermore, and in accordance with section 76 of the *Education (Queensland College of Teachers) Act 2005*, the Principal of Rockhampton Girls Grammar School will report to the Queensland College of Teachers any investigations into allegations of harm caused, or likely to be caused, to a student because of the conduct of a teacher at the School.

Any report made under this section or the Rockhampton Girls Grammar School **RGGS-058-POL CHILD PROTECTION POLICY** will fulfill the reporting obligations of all adults under the *Criminal Code Act 1899*.

Reports required under the *Criminal Code Act 1899* which are not made under mandatory reporting obligations are made to the Queensland Police Service.

All adults, inclusive of parents/guardians, volunteers and student 18 years or older also have reporting obligations to report to police should they have a reasonable belief that an adult has committed a child sexual offence.

Under section 229BC of the *Criminal Code Act 1899*, it is a criminal offence when any adult in Queensland, including students who are 18 years or older, fails to report to the Queensland Police Service (Police) a reasonable belief that a child sexual offence is being, or has been, committed against a child by another adult.

This commitment is evidence of the School's fulfilment of the requirements of schedule 1 s.2(4) of the Working with Children Regulation.

7. MANAGING BREACHES OF THIS CHILD RISK MANAGEMENT STRATEGY

The School is committed to appropriately managing breaches of this Strategy in accordance with its other relevant policies as appropriate in the circumstances, such as its **RGGS-058-POL CHILD PROTECTION POLICY**, **RGGS-037-POL STAFF CODE OF CONDUCT**, and **RGGS-009-POL COMPLAINTS HANDLING POLICY**, and this is evidence of fulfilment of the requirements of Schedule 1 s.2(5) of the Working with Children Regulation. The School will promptly record, monitor and report to the Board regarding any breaches of this Strategy.

8. IMPLEMENTING AND REVIEWING THE CHILD RISK MANAGEMENT STRATEGY

The introduction to this Strategy and section 14, "Compliance and Monitoring", state Rockhampton Girls Grammar School's commitment to reviewing the Strategy annually.

This Strategy in its entirety and its related policies and procedures are evidence of fulfilment of the requirements of Schedule 1 s.2(6)(a) of the Working with Children Regulation relating to implementation.

9. BLUE CARD POLICIES AND PROCEDURES

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

- comply with all of the requirements of the Working with Children Act and Working with Children Regulation
- Appoint a school contact person who will be responsible for managing the screening process and all related documentation and records required under the Working with Children Act and Working with Children Regulation
- Meet all reporting and notification requirements arising under the Working with Children Act and Working with Children Regulation
- Act to monitor the expiry dates of Blue Cards and exemption cards and remind Staff to keep these up to date



- Take appropriate action if an employee, volunteer, trainee student or school board member fails to submit a renewal application prior to their working with children authority expiring. Keep a written record of all relevant actions, decisions and outcomes relating to matters under the Working with Children Act and Working with Children Regulation, including (where relevant) the matters above, via the School's Blue Card Register
- Ensure that all information in relation to working with children authority is kept confidential.

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

10. HIGH RISK MANAGEMENT PLANS

Rockhampton Girls Grammar School is committed to identifying, assessing, eliminating, controlling and monitoring risks to the safety of students on an ongoing basis, including in relation to high risk activities such as sport, excursions and special events. The School 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 Rockhampton Girls Grammar School's fulfilment of the requirements of schedule 1 s.2(7) of the Working with Children Regulation.

11. STUDENT WELLBEING

The School's Pastoral Care program takes an active role in supporting the health and wellbeing of students. The program incorporates a carefully considered structure including School Counsellor, Directors of Primary and Secondary School, Transition Officer, Deputy Principal – Students, School Nurse, Indigenous Liaison Officer and Care Teachers. The program also provides education to all students on matters of child protection and other topics which support their health and wellbeing.

The student counselling service provides counselling and confidential support and is available to all students.

12. STRATEGIES OF COMMUNICATION AND SUPPORT

Rockhampton Girls Grammar School's commitment to making this *Child Risk Management Strategy* available to students, parents and employees via its website is evidence of fulfilment of the requirements of schedule 1 s.2(8)(a) of the Working with Children Regulation.

The School is committed to training Staff in relation to, identifying risks of harm to students, handling disclosures or suspicions of harm (including reporting obligations under the **RGGS-058-POL CHILD PROTECTION POLICY** and the content of this Strategy. The School will conduct this training regularly via annual professional development, informal updates at staff meetings and regular discussions between managers and Staff. This is evidence of fulfilment of the requirements of schedule 1 s.2(8)(b) of the Working with Children Regulation.

13. RESPONSIBILITIES

Rockhampton Girls Grammar 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 Strategy and related School policies and procedures.



14. COMPLIANCE AND MONITORING

Rockhampton Girls Grammar School will review this Strategy annually (or more frequently if required) to respond to legislative or operational changes, incident outcomes and other relevant matters. The School will record, monitor and report to the Board of Trustees of Rockhampton Girls Grammar School, the Executive and the HR Officer regarding any breaches of this Strategy.

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

15. HELPFUL LINKS

- Independent Schools Queensland's [Child Protection Decision Support Tree for Non-Teaching Staff](#)
- Independent Schools Queensland's [Child Protection Decision Support Tree for Teachers](#)
- Department of Children, Youth Justice and Multicultural Affairs [Child Protection Guide](#) resource
- Blue Card Services Resources <https://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-and-licensing/blue-card/system/resources>

16. APPENDICES

- Appendix 1 - Summary of Reporting Harm
- Appendix 2 – RGGS-080-FRM-CHILD PROTECTION REPORTING FORM
- Appendix 3 – RGGS-081-FRM-RESTRICTED PERSON DECLARATION FORM
- Appendix 4 - Definitions



Appendix 1: Summary of Reporting Harm

Who	What abuse	Test	Report to	Legislation
All staff	Sexual	Awareness or a suspicion Sexually abused or likely to be sexually abused	Principal, through to police	EGPA sections 366 and 366A
Teacher	Sexual and physical	Significant harm Parent may not be willing and able	Confer with Principal, report to Child Safety	CPA sections 13E and 13G
All staff	Physical, psychological, emotional, neglect, exploitation	Significant harm Parent may not be willing and able	Principal, through to Child Safety	Accreditation Regulations section 16
All staff	Any	Not a level that is otherwise reportable to Child Safety, refer with consent	Principal, through to Family and Child Connect	CPA Sections 13B and 159M
Principal	Any	Not a level that is otherwise reportable to Child Safety, refer without consent	Family and Child Connect	CPA Sections 13B and 159M
Any member of the public	Any	Significant harm Parent may not be willing and able	Child Safety	CPA section 13A
Any adult	A child sexual offence against a child by another adult	Gains information that causes the adult to believe on reasonable grounds, or ought reasonably to cause the adult to believe, that a child sexual offence is being or has been committed and (b) at the relevant time, the child is or was— (i) under 16 years; or (ii) a person with an impairment of the mind.	Police	Criminal Code section 229BC



Appendix 2: RGG-080-FRM-CHILD PROTECTION REPORTING FORM

Report of Suspected Harm or Sexual Abuse

Date:	
School:	
School Phone:	
School Email:	
School Address:	

DETAILS OF STUDENT/CHILD HARMED OR AT RISK OF HARM/ABUSE:	
Legal Name:	Preferred Name:
DOB:	Sex:
Year Level:	Cultural Background:
Primary language spoken:	
Aboriginal <input type="checkbox"/> Torres Strait Islander <input type="checkbox"/> Aboriginal and Torres Strait Islander <input type="checkbox"/>	
Does the student have a disability verified under EAP: Yes <input type="checkbox"/> No <input type="checkbox"/>	Disability Category:
Student's Residential Address:	Phone:
	Student's Personal Mobile:

FAMILY DETAILS	
Parent/caregiver 1:	Relationship to Student:
Address (if different from student):	
Phone: (H):	(W): (M):
Parent/caregiver 2:	Relationship to Student:
Address (if different from student):	
Phone: (H):	(W): (M):
Is the student in out of home care? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Are there any Family Court or Domestic Violence orders in place? Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/>	

PERSON ALLEGED TO HAVE CAUSED THE HARM OR ABUSE		
<input type="checkbox"/> Adult family member	<input type="checkbox"/> Child family member	<input type="checkbox"/> Other adult
<input type="checkbox"/> Student/other child	<input type="checkbox"/> Unknown	



PROVIDE ALL INFORMATION YOU HAVE WHICH LED TO THE SUSPICION OF HARM OR ABUSE (Attach extra pages if necessary).

Details of any harm and/or sexual abuse to the student – please include: Time and date of the incident; location of the incident, source of information; details of person alleged to have caused the harm or sexual abuse; physical appearance of any injury; immediate and ongoing safety concerns; any disclosures made by student; any previous incidents of harm; behavioural indicators of harm; presence of any medical needs or developmental delays; and if the information relates to an unborn child, the alleged risk to the unborn child.

Please indicate the identity and particulars of anyone else who may have information about the harm or abuse

Additional information provided as an attachment YES NO

NAME OF STAFF MEMBER MAKING REPORT IF NOT THE PRINCIPAL:

Position:	Signature:	Date:
Principal:	Signature:	Date:
Principal's email address:		
Response requested by school:		

ACTION TAKEN

Form was emailed to (please tick which agencies the form was sent to):	<input type="checkbox"/>	Queensland Police Services (QPS)
	<input type="checkbox"/>	Department of Child Safety, Youth and Women
	<input type="checkbox"/>	Family and Child Connect

(Adapted from EQ SP-4 Report of Suspected Harm or Risk of Harm)

Confirm receipt of emailed form and ensure original is stored in a secure location along with any other documentation collected for the purpose of this report.



Appendix 3: RGG-081-FRM-RESTRICTED PERSON DECLARATION FORM

RESTRICTED PERSON DECLARATION FORM

Rockhampton Girls Grammar School has a responsibility to ensure that all commencing and continuing individuals, working or volunteering with children, at Rockhampton Girls Grammar School are not a **restricted person**.

As of the 31 August 2020, Blue Card Services have made changes which mean certain individuals are no longer able to rely on the current exemptions to work or volunteer with children.

The amended legislation introduced 2 new terms—**restricted person** and **restricted employment**. It is now an offence for a **restricted person** to commence or continue working or volunteering in **restricted employment**.

A **restricted person** is a person who:

- has been issued a negative notice, or
- has a suspended blue card, or
- is a [disqualified person](#), or
- has been charged with a [disqualifying offence](#) which has not been finalised.

Restricted employment refers to the situations or exemptions that allow a person to work with children without a blue card. These include:

- a volunteer parent;
- a volunteer who is under 18;
- paid or unpaid staff who work in child regulated employment for not more than 7 days in a calendar year.

If you are a **restricted person** it is an offence for you to commence or continue working or volunteering at Rockhampton Girls Grammar School. The maximum penalty is \$66,725 (500 penalty units) or 5 years in prison. It is also an offence for Rockhampton Girls Grammar School to engage or continue to engage a **restricted person**. The maximum penalty is \$26,690 (200 penalty units) or 2 years in prison.

If you become a **restricted person** whilst working or volunteering at Rockhampton Girls Grammar School you must cease all child related work **immediately** and notify the HR Officer you are no longer able to work or volunteer for Rockhampton Girls Grammar School.

DECLARATION

Which one of the restricted employment exemptions are you relying on to work or volunteer for Rockhampton Girls Grammar School?

- a volunteer parent
- a volunteer who is under 18
- child-related engagement for not more than 7 days in a calendar year

I _____ declare:

1. I am not a restricted person.
2. I understand it is an offence to start or continue working or volunteering in restricted employment if I am currently, or become, a restricted person.
3. I will cease all child related work **immediately** and notify Rockhampton Girls Grammar School if my circumstances change.

Signature: _____

Date: _____



APPENDIX 4: Definitions

Harm:

Section 9 of the Child Protection Act 1999 - "Harm", to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing.

1) It is immaterial how the harm is caused.

Harm can be caused by—

- a) physical, psychological or emotional abuse or neglect; or
 - b) sexual abuse or exploitation.
- 2) Harm can be caused by—
- a) a single act, omission or circumstance
 - b) a series or combination of acts, omissions or circumstances.

Sexual Abuse:

Section 364 of the Education (General Provisions) Act 2006 - "Sexual abuse", in relation to a relevant person, includes sexual behaviour involving the relevant person and another person in the following circumstances –

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

Child in need of Protection:

Section 10 of the Child Protection Act 1999 - A "child in need of protection" is a child who—

- a) has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm; and
- b) does not have a parent able and willing to protect the child from the harm.