



BRISBANE CATHOLIC EDUCATION CHILD AND YOUTH RISK MANAGEMENT STRATEGY

PART 1: COMMITMENT

Statement of Commitment (*mandatory requirement 1*)

Brisbane Catholic Education (“BCE”) is committed to the safety and wellbeing of all students. BCE respects and values the dignity, self-esteem and integrity of every child and young person, based on our Christian belief that every person is made in the image of God and children and young people are entrusted to us by the love of God.

Making the school a place of safety and a nurturing community of care, is an essential part of BCE’s ethos and underpins our commitment to the protection of students. BCE strives to ensure a culture where all acknowledge an understanding that student protection is the responsibility of everyone. Important in developing this culture is the education of students about personal safety strategies and a focus by BCE schools on the safety and wellbeing of students being at the centre of every preventative and protective action they take.

BCE has formed a Domestic and Family Violence Working Party which is tasked with considering and implementing the relevant recommendations of the *Not Now, Not Ever* report.

BCE’s Child and Youth Risk Management Strategy has been developed in compliance with our obligations under the *Working with Children (Risk Management and Screening) Act 2000* and the *Working with Children (Risk Management and Screening) Regulation 2011* to promote and protect children and young people.

Codes of Conduct (*mandatory requirement 2*)

BCE has developed codes of conduct and standards of behaviour for employees, students, volunteers (including parents) and other personnel in consultation with relevant parties. These codes of conduct set out BCE’s requirements in relation to the conduct of employees, students, volunteers and other personnel and contain specific information on interacting with students.

Employees are also bound to comply with BCE’s Statement of Principles for Employment in Catholic Schools or the Statement of Principles for Employment Catholic Education and other relevant professional standards (for example, the Australian Professional Standards for Teachers and the Australian Professional Standards for Principals describe effective, contemporary practice for teachers and principals).

BCE Employee Code of Conduct

The Catholic Education Archdiocese of Brisbane Code of Conduct (“Code of Conduct”) sets out the standard of behaviour required by BCE in the performance of their employees’ duties. All BCE employees must comply with the Code of Conduct, including employees employed on a temporary, casual, fixed term or continuing basis.

The Code of Conduct states that BCE employees must act appropriately and professionally at all times in their interactions with students and observe appropriate boundaries, behaviour and contact with students. In addition, the Code of Conduct covers the employee's duties in relation to risk management and duty of care obligations to students.

BCE has reviewed its Code of Conduct and produced online training materials. BCE has uploaded the Code of Conduct to its Intranet (KWeb). BCE requires Principals and Managers to facilitate enrolment in the online Code of Conduct training for employees at the time of induction for new staff and at least biennially for all other staff. BCE makes available to Principals and BCE employees, training materials on the Code of Conduct.

Student Behaviour Support Policy

The Student Behaviour Support Policy requires all BCE schools to develop a Student Behaviour Support Plan for their school, in consultation with all groups in the school community and implement that plan for a whole school approach to support student behaviour in the school environment.

BCE's Student Behaviour Support Plan for schools must reflect the shared values and expectations of the school to student behaviour support and maintain a supportive Catholic school environment. The Student Behaviour Support Plan must include a student code of behaviour, guided by BCE's Student Behaviour Support Policy. BCE requires all BCE schools to make the Student Behaviour Support Plan readily accessible to students and parents.

BCE has developed the Student Behaviour Support System (SBSS) which supports schools to track the behaviour of students and uses data based decision making to proactively support student's behaviour.

Volunteer Code of Conduct

BCE has developed a Volunteer and Other Personnel Code of Conduct which outlines the standard of behaviour which is required of volunteers (including parents) and other personnel in their activities in the school, including the need to think and act safely and treat students and staff with respect. BCE requires all BCE schools to ensure that volunteers and other personnel comply with the Volunteer and Other Personnel Code of Conduct.

In addition, BCE has developed an interactive online training module located on the BCE Public Website and a Volunteer Register Sheet.

BCE requires BCE schools to ensure that:

- the BCE Volunteer and Other Personnel Code of Conduct is implemented in the school community;
- all volunteers and other personnel are able to access a copy of the Volunteer and Other Personnel Code of Conduct;
- all volunteers and other personnel comply with the school's Volunteer and Other Personnel Code of Conduct to continue their voluntary/professional engagement at the school;
- all volunteers and other personnel have completed Student Protection Training via the interactive online training module located on the BCE Public Website; and
- all volunteers and other personnel must complete and sign the Volunteer and Other Personnel Register Sheet.

PART 2 - CAPABILITY

Procedures for recruiting, selecting, training and managing staff that enhance the safety and wellbeing of children and young people and the protection of children and young people from harm (*mandatory requirement 3*)

Recruitment and selection

BCE's recruitment and selection processes aim to recruit and select employees that work with students in BCE schools that are appropriately qualified and suitable for working with children and young people.

BCE schools are involved in staff recruitment, selection, training and management of employees in BCE schools in partnership with personnel from the BCE offices.

Principals and employees in BCE schools must comply with BCE's policies and procedures in relation to recruitment, selection, training and managing of employees. The procedures for the selection and appointment of employees which are published on the BCE Intranet include:

- Recruitment, Selection and Appointment of Teachers Procedure;
- Recruitment, Selection and Appointment of Brisbane Catholic Education Office Staff;
- Recruitment, Selection and Appointment of Middle Leaders;
- Recruitment, Selection and Appointment (Acting Senior Leadership Positions in Schools);
- Recruitment, Selection and Appointment of P – 12 Heads;
- Recruitment, Selection and Appointment of DPs, APs and APREs;
- Recruitment, Selection and Appointment of Principals; and
- Recruitment, Selection and Appointment of Specialist Positions, such as Guidance Counsellors, School Pastoral Workers, Speech Pathologists, Campus Ministers and School Chaplains.

In advertising new positions in schools, BCE's advertising template states that "This position involves working with children. The appointment of a successful applicant will be subject to satisfactory employment screening for child related employment in accordance with the law".

BCE adheres to the requirements of the *Working with Children (Risk Management and Screening) Act 2000*, *Working with Children (Risk Management and Screening) Regulation 2011*, *Education (Accreditation of Non-State Schools) Act and Regulation 2001*, and the *Education (Queensland College of Teachers) Act 2005* with regards to employment.

All non-teaching employees working in BCE schools are required to comply with BCE's Blue Card Screening Procedures (discussed below). BCE requires all non-teaching employees, volunteers and trainee students who work with students and who require a Blue Card under the *Working with Children (Risk Management and Screening) Act 2000*, to obtain a Blue Card and keep it current. All teachers are required to produce evidence of current teacher registration with the Queensland College of Teachers ("QCT") before they commence work in BCE schools.

Training and Management of Employees

BCE requires all school based employees to complete induction training. Principals are required by BCE to ensure that all new employees are provided with induction training on the school's

processes and procedures, the values and expectations of BCE and the standard of behaviour required of employees in their interactions with students, to support BCE schools to provide an environment that is safe and supportive for students. BCE conducts induction training for all new BCE Principals. This training provides details on the Code of Conduct and BCE's key strategic documents and includes meeting key people in BCE who support Principals.

All employees who work in BCE schools must complete mandatory online training in BCE's Student Protection Processes, once every two years. Student protection training covers BCE's requirements under the Student Protection Processes in relation to reporting by staff of suspicions or allegations of:

- sexual abuse/likely sexual abuse of students;
- harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse or neglect; and
- inappropriate behaviour of staff to students.

This training provides BCE employees who work with students with strong skills to effectively respond to and report suspicions or allegations, as required by law. New school based employees must complete this training within four weeks of commencing work for BCE. In the alternate year, face to face refresher training for employees is conducted by the Principal at BCE schools. In addition, BCE have introduced mandatory training for newly appointed Student Protection Contacts to upskill them in receiving and managing disclosures from students.

Additional on-going training is provided by BCE and employees are encouraged to attend. BCE has a dedicated Workforce Capability Team which co-ordinates professional learning opportunities for BCE employees to enable BCE employees to enhance their professional or personal knowledge and skills. Many of the courses offered to employees relate to the safety and wellbeing of students. For example, courses are offered from time to time on bullying at schools, behaviour management of students, students at risk of harm and students with special needs.

Where there is a complaint or allegation in relation to an employee of inappropriate behaviour, unsatisfactory performance or misconduct, BCE takes all appropriate management action, which may include requiring employees to undertake additional training, mentoring employees, explaining BCE's expectations and requirements to the employee, or dismissal. BCE has developed a BCE Staff Complaints Management Procedure and BCE Staff Misconduct Procedure to enable Principals/Managers to have a clear and consistent process for handling complaints and allegations of misconduct.

BCE provides the Employee Assistance program to give free and confidential counselling to employees who require support.

Other BCE Support for Student Wellbeing

BCE recognises that students learn best in school environments in which they feel safe, both physically and emotionally. BCE has developed a number of policies, processes and resources to support the pastoral care and wellbeing of students. These are readily accessible to BCE employees on BCE's Intranet and informal training is provided within schools, from time to time, at staff meetings and 'in service' days, so that employees are aware of these policies.

These policies and processes include:

- BCE Pastoral Care and Wellbeing Position Statements
- Children and Young People in Care of the State
- Refugee, At Risk and Marginalised Students
- Natural Disasters: Preparation and Response
- Critical Incident Response Guidelines
- A Catholic Perspective on Relationships and Sexuality Education Shape Paper
- Teacher Background Supporting a Catholic Perspective in Relationships and Sexuality Education
- Relationships and Sexuality Conceptual Framework
- Online BCE Australian Curriculum and a Catholic Perspective
- Preventing and Responding to Student Bullying in Schools Policy
- Management of Drug Related Incidents in Schools
- Management of Police Interventions in Schools
- Management of Weapons in Schools Guideline
- Suicide Intervention (Lifeline Prevention Program)
- Suicide Postvention Guideline
- Students with Disabilities Policy
- Student Attendance Policy and Guidelines
- Manual Handling – the Handling of Students Policy
- Administration of Medicine to Students Policy
- Positive Behaviour for Learning
- Social Media Policy

BCE has a Student Wellbeing Team which supports BCE schools in the pastoral care and wellbeing of students and develops strategies, policies and procedures for schools and students. Every BCE school employs a School Guidance Counsellor to work with students, parents and staff and provide pastoral care, personal safety strategies, support for marginalised students and support for students who may be at risk of being harmed.

BCE has a number of university partnerships which provide a wide range of additional psychological services to students and their families and professional learning for staff regarding a Catholic perspective on relationships and sexuality education.

PART 3 - CONCERNS

Policies and procedures for handling disclosures or suspicions of harm (mandatory requirement 4)

Student Protection Processes

BCE's Student Protection Processes provide a process for all staff who work in BCE schools to recognise, respond and report allegations or suspicions of:

- sexual abuse/likely sexual abuse of students;
- harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse or neglect; and
- inappropriate behaviour of staff to students.

The Student Protection Processes have been developed in accordance with the requirements of the *Education (Accreditation of Non-State Schools) Act and Regulation 2001*, the *Education (General Provisions) Act and Regulation 2006*, the *Working with Children (Risk Management and Screening) Act 2000* and *Working with Children (Risk Management and Screening) Regulation 2011*, the *Child Protection Act 1999* and the *Education (Queensland College of Teachers) Act 2005*. The *Student Protection Processes Catholic Education Archdiocese of Brisbane* document was reviewed and republished in keeping with the QCEC template that was developed in collaboration with BCE and other Catholic employing authorities. The 2017 BCE processes were approved by NSSAB in June 2017.

The Student Protection Processes are also underpinned by the Archdiocese of Brisbane Catholic Education Council's Student Protection Policy (2011) and complements the procedures developed by the National Committee for Professional Standards entitled *Towards Healing – Principles and Procedures in Responding to Complaints of Abuse Against Personnel of the Catholic Church in Australia* (2010) and the document entitled *Integrity in the Service of the Church* (September 2011).

Reports are to be made to the Queensland Police Service in relation to allegations or reasonable suspicions of sexual abuse/likely sexual abuse of a student or to the Department of Communities, Child Safety and Disability Services for harm/risk of harm to a student caused by sexual abuse, physical abuse, emotional abuse or neglect. If a report is made in relation to inappropriate behaviour of a staff member towards a student, that report will be handled by the Principal, with support from BCE's Professional Standards and Student Protection Team. All school based employees must complete mandatory on-line training on BCE's Student Protection Processes every two years and BCE requires Principals at BCE schools to sign off that this mandatory training has been completed. Face to face refresher training is offered in the alternate year to school based employees.

The Student Protection Processes are readily available for employees, parents, students and carers and BCE requires that all BCE schools upload the link to the Student Protection Processes to their school website.

BCE has developed a Student Protection Case Management System to enable staff to complete on-line a Record of Concern about any student protection concerns, including allegations or suspicions of sexual abuse or likely sexual abuse of a student, harm or risk of harm to a student or inappropriate behaviour of a staff member towards a student.

BCE has developed a complaints procedure to enable parents or students to make a complaint that a BCE school has not complied with the Student Protection Processes. Parents or students may make a complaint via the Record of Complaint about Non-Compliance with BCE's Student Protection Processes located on BCE's public website. Area Supervisors and Principals are required to handle these complaints in accordance with BCE's Procedure for Handling Complaints about Non-Compliance with BCE's Student Protection Processes.

School Student Protection Contacts

In accordance with the *Education (Accreditation of Non-State Schools) Regulation 2001* each BCE school must have two stated staff members to whom a student can report behaviour of another staff member that the student considers is inappropriate.

All BCE schools must nominate the Principal and at least one other staff member as a Student Protection Contact within the school. The role of the Student Protection Contact is to receive

complaints and allegations from staff and students and to make or assist staff to make all reports as outlined in BCE's Student Protection Processes. BCE requires all BCE schools to make staff, students, volunteers and parents aware of the identity of the school Student Protection Contacts, through school newsletters, posters in the school and parent information nights.

BCE recommends in larger schools that Principals consider nominating additional Student Protection Contacts. Information about the Student Protection Contacts and requirements for their appointment is detailed within the Student Protection Processes. Student Protection Contacts are required to undertake additional mandatory training to upskill them in receiving and managing disclosures from students.

Student Protection Officers

BCE has a Student Protection Team and Student Protection Officers working in this team are experts in the field of child protection. They all hold a degree in human services (generally social work) and have significant experience working in child protection.

Student Protection Officers assist school based employees in assessing sexual abuse and likely sexual abuse and harm caused or at a risk of being caused to students by sexual abuse, physical abuse, emotional abuse or neglect. They also offer support and guidance to schools during and after a student protection intervention, assist with compliance with the Student Protection Processes and develop and facilitate professional learning for staff.

A plan for managing breaches of the Child and Youth Risk Management Strategy (*mandatory requirement 5*)

BCE takes any breach of its *Child and Youth Risk Management Strategy* seriously. Breaches may be dealt with as follows:

- if the alleged breach relates to the actions of an employee, BCE will manage this, as appropriate, in accordance with the BCE Staff Complaints Management Procedure, the BCE Staff Misconduct Procedure, Office Employee Unsatisfactory Performance Process or School Employee Unsatisfactory Performance Process;
- if the alleged breach relates to a report of inappropriate behaviour of a staff member to a student, BCE will manage this in accordance with the process set out in the Student Protection Processes;
- if the breach relates to a complaint made via the Record of Complaint about Non-Compliance with BCE's Student Protection Processes, that complaint will be dealt with in accordance with the Procedure for Handling Complaints about Non-Compliance with BCE's Student Protection Processes;
- if the breach relates to the actions of a volunteer or other personnel, this will be dealt with in accordance with the Volunteer and Other Personnel Code of Conduct and the procedures set out in the Student Protection Processes, as appropriate; and
- if the breach relates to the action of a contractor, BCE will take appropriate action under BCE's contract with the contractor.

A risk management plan for high risk activities and special events (*mandatory requirement 7*)

Risk Management Tools

BCE requires all BCE schools to consider all curriculum activities in terms of their inherent level of risk. When undertaking a medium or high-risk activity or special event, BCE schools are responsible for identifying potential risks and considering the safety and wellbeing of students and the risk of harm to students.

BCE requires BCE schools to develop and implement an effective risk management plan to remove or minimise the risk of harm to students. The plan should include risk assessment and risk mitigation which is carried out for all medium or higher risk activities undertaken within the school and all activities undertaken outside of the school. Information in relation to risk assessments for various activities and risk assessment tools is provided for the use of BCE schools on BCE's Health and Safety Portal on the BCE Intranet.

The Health and Safety Team at BCE provides support to BCE schools, if requested, to help schools carry out risk assessments and develop and implement a risk management plan. In addition, a dedicated Workplace Health and Safety Officer ("WHSO") is employed at every BCE school (who is required to complete a Certificate 4 in Workplace Health and Safety within 12 months of commencing the role). The WHSO's role is to co-ordinate risk assessments at BCE schools and support the Principal in carrying out the health and safety responsibilities under legislation. BCE provides training and updates to the WHSO.

BCE has developed a Contractor Induction Manual to give contractors information on BCE's Workplace Health and Safety Contractor Management System at BCE schools, so that contractors working at schools play their role in maintaining a safe environment for students.

Risk Management for Excursions and Fetes

Principals are responsible for approving all excursions. BCE have developed the OH & S Fact Sheet: Excursions, OH & S Standard - Risk Management Form and the Risk Assessment Template Form to assist Principals in identifying, assessing and managing risks associated with excursions. Principals are required by BCE to complete the Risk Assessment Template Form prior to each excursion. This form specifies that in carrying out a risk assessment, student protection risks must be assessed and managed.

BCE has developed and implemented International Travel Procedures to improve practices in planning for the safety of students participating in international travel.

BCE implemented online safety training in its schools for students undertaking IDT and hospitality. This safety training assists teachers to ensure students receive consistent safety training for the use of high risk equipment in these curriculum areas.

BCE has developed a Fete Safety Planning Checklist to assist the Principal in managing the health and safety risks of conducting a fete and the Principal must sign off on the Fete Checklist prior to a fete taking place. BCE provides Principals with links to relevant information to assist in the risk assessment and management process on BCE's Health and Safety Portal, including the Fireworks

Checklist, Amusement Devices Checklist, Contractors Workplace Health and Safety Agreement and information on the hygienic handling of food.

Other Strategies to Minimise Risks of Harm

BCE takes seriously its commitment in relation to the safety and protection of students and has developed policies and procedures to manage risks of harm to students, for example:

- Supervision - BCE schools must manage the supervision of students appropriately to ensure that there is adequate supervision of students as detailed in the Code of Conduct.
- Emergency - BCE schools must ensure that employees are briefed to appropriately handle emergency situations and critical incidents in accordance with BCE's Procedures for Responding to Critical Incidents.
- Fire/Lockdown - BCE schools must ensure that all employees and volunteers are made aware of fire evacuation and lockdown procedures at the school.
- Visitors/Outsiders - BCE schools must have procedures in place for the management of visitors and other outsiders, including relevant signage and directions together with a visitor sign in register and procedures for signing in and out of the school.
- Media/Communications strategies – BCE schools must obtain the permission of parents (using the Consent Form, All Forms of Media and Communications) for the use of student photographs and names in any materials issued to the public in printed or electronic form. Identifying information of students is not used in promotional material without the specific permission of the parents and the students concerned. Specific informed consent must be obtained by BCE schools for any publication of names and photos in media outside the local school.
- Computer/Internet - All employees and students are required to observe the Brisbane Catholic Education Email, Internet and Intranet Acceptable Use Statement. BCE requires that in BCE schools, resources such as the Acceptable Use of Computer and Internet Resource Consent Form are implemented.
- Guidance Counselling Service – BCE's Guidance Counsellors must obtain Informed Consent from a parent and/or student for participation in any guidance counselling services offered.

PART 4: CONSISTENCY

Policies and procedures for compliance with Chapter 8 of the *Working with Children (Risk Management and Screening) Act 2000* (which regulates the Blue Card system) (mandatory requirement 6)

Blue Card Requirements and Employee Register

BCE's Blue Card Screening Procedure details BCE's requirements in accordance with the *Working with Children (Risk Management and Screening) Act 2000* to ensure that the required personnel hold a Blue Card. BCE requires BCE schools and Principals to comply with the requirements of the Blue Card Screening Procedure.

BCE requires all employees, volunteers and trainee students who work with children under 18 years of age to obtain and hold a Blue Card (unless exempt), including:

- all school based BCE employees who are not registered with either the QCT or the Australian Health Practitioner Regulation Agency;

- volunteers (who are not parents of enrolled children);
- preservice teachers undertaking practical teaching sessions as part of compulsory academic course requirements;
- self-employed people, paid employees and volunteers whose usual duties include, or are likely to include, the teaching, coaching or tutoring of a child, individually on a commercial basis;
- students who undertake formal traineeships as part of their studies which involve work in child related employment, including conducting sport and recreation activities directed at children; and
- school board members (excluding current parents on a board at their own child's school).

A centralised register of Blue Card information for all paid employees, unless exempt, is maintained by BCE. It is a requirement that all BCE schools provide Blue Card information to the BCE office when an employee, unless exempt, is engaged. BCE schools must also ensure that details of any Blue Card renewals, applications and changes in status are also forwarded to the BCE office.

All teachers employed by BCE must be registered with the QCT. Principals are required by BCE to see the original certificates of registration and qualifications before employment commences. New non-teaching employees must have applied for a Blue Card prior to commencing work.

BCE schools must maintain a register of Blue Card information for all volunteers, unless exempt. Volunteers who require a Blue Card under the *Working with Children (Risk Management and Screening) Act 2000* must obtain the Blue Card before commencing work.

Procedures for reviewing the Child and Youth Risk Management Strategy

To ensure that BCE's Child and Youth Risk Management Strategy remains current and effective, this strategy will be monitored and reviewed annually. In the event that BCE identifies concerns, particularly following an incident, BCE's Child and Youth Risk Management Strategy will be reviewed.

In the review, BCE will record the date of the review, where the review took place, who was present and what was discussed. Issues to be considered in the review may include:

- whether BCE policies and procedures were followed;
- whether any incidents relating to children and young people's risk management issues occurred;
- the actual process used to manage any incidents;
- the effectiveness of BCE's policies and procedures in preventing or minimising harm to children and young people; and
- the content and frequency of training in relation to BCE's Child and Youth Risk Management Strategy.

Following the review, BCE schools, employees, parents and volunteers will be advised of any changes to BCE's policies and procedures as a result of the review and where appropriate, training will be provided.

Strategies for communication and support (*mandatory requirement 8*)

Student Protection Training

As discussed above, all BCE school based staff must complete mandatory on-line training on BCE's Student Protection Processes. Principals are required to sign off that every staff member has completed the course.

BCE schools are required by BCE to have the Student Protection Processes readily accessible to parents, students and staff and that parents, students and staff are made aware of the processes and the process for reporting behaviour of a staff member that a student considers to be inappropriate. Principals are also required to ensure that the 'Recognise React Report' posters are displayed prominently in areas of the school frequented by students.

Training on BCE's Child and Youth Risk Management Strategy

BCE's Child and Youth Risk Management Strategy is uploaded on BCE's public website. BCE requires BCE schools to have a link to BCE's Child and Youth Risk Management Strategy and the school's Child and Youth Risk Management Strategy uploaded on the BCE school's website.

BCE has developed a toolkit which it has provided to all BCE schools to assist BCE schools and Principals in implementing and communicating the BCE Child and Youth Risk Management Strategy to parents, employees, volunteers and other personnel. The toolkit contains:

- briefing materials which Principals can use to brief parents and students on BCE's Child and Youth Risk Management Strategy, which would be suitable for newsletters or parent information nights;
- a framework Child and Youth Risk Management Strategy which may be adapted and completed by BCE schools for use in their schools; and
- training materials for BCE school based employees to provide details on BCE's Child and Youth Risk Management Strategy.