

CHILD RISK MANAGEMENT STRATEGY

GUIDING SCRIPTURE

Jesus said, "Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these." (Matthew 19:14).

PURPOSE

The purpose of this strategy is to eliminate and minimise risk to student safety to ensure the safety and wellbeing of all students. This Strategy forms part of our overarching framework to effectively manage risks of harm to children and young people.

SCOPE

The scope of this Strategy extends to everybody involved with the School, including students and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers, School Council members and people undertaking work experience or vocational placements at St John's Lutheran School.

DEFINITIONS

Under *Section 8 of the Child Protection Act 1999*, a **child** is an individual under 18 years.

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

Under *Section 364 - 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.

STATEMENT OF COMMITMENT TO SAFETY AND WELLBEING OF CHILDREN

St John's Lutheran School is committed to providing quality education which endeavours to prepare children for the future, in a caring, supporting Christian environment. St. John's Lutheran School is committed to taking all reasonable steps to promote the safety and wellbeing of students enrolled at the School and their protection from foreseeable harm,¹ and we are committed to responding to allegations of harm to students and acting in accordance to the *Working With Children (Risk Management and Screening) Act 2000 (Qld)* .

St John's Lutheran School strives to provide a safe and supportive learning environment where our students are protected from abuse, neglect or harm and where staff work according to our organisational mission, vision and Christian values. The following values reflect the culture that we are committed to promoting within our School and act as a guide for our School community to live by:

Christ – We ask, “What would Jesus do?”

Co-operation – We co-operate with others

Communication – We communicate in socially acceptable ways

Courtesy – We use good manners in all situations

Consideration – We respect the feelings and property of others

Care – We care for ourselves, others and our world

Christian Leadership – We serve, help and encourage others.

IMPLEMENTATION

In practice, St. John's Lutheran School's commitment to acting in accordance with *the Working with Children (Risk Management and Screening) Act 2000 (Qld)* (“the Act”) to promote the safety and wellbeing of students means that it will implement the measures outlined below in Sections 1 - 8.

¹ *Working with Children (Risk Management and Screening) Regulation 2020 (Qld)* Sch 1 s.2(1)

1 Code of Conduct

At St John's Lutheran School, we expect employees, volunteers, and people undertaking work experience or vocational placements to:

- Always behave in ways that promote the safety, welfare and well-being of our students
- Actively seek to prevent harm to students, and to support those who have been harmed.

All staff, School Council members, support service personnel, P&F Executive, and people undertaking work experience or vocational placements sign the *Code of Conduct Policy* which confirms their commitment to uphold St John's Lutheran School expected standards of behaviour.

Specific responsibilities and expected behaviours of all people outlined in the 'Scope' of this Strategy include:

BEHAVIOUR	EXPECTATION
Relationships and professional boundaries	<p>The relationship between a student and staff must not breach the maintenance of clear professional boundaries. Staff are to maintain personal and professional boundaries.</p> <p>Close personal relationships with students outside of the School are inappropriate and will not be tolerated</p> <p>Staff are to build relationships based on trust, empowering students to share in decision-making.</p>
Language	<p>Do not use inappropriate or aggressive language (insults, criticism or name calling), profanities (swearing), derogatory terms, sexual jokes or innuendos or bullying.</p> <p>Language is to be positive and encouraging, with open and honest communication at all times.</p>
One on one contact with students Supervision of students	<p>Avoid being alone, isolated or unobserved with a student as far as is practicable.</p> <p>Where possible, all activities and/or discussions with students are to be conducted in an open area and in view of other people.</p> <p>Where staff are responsible for supervising students, staff are to ensure the students:</p> <ul style="list-style-type: none"> • Engage positively • Behave appropriately toward one another • Are in a safe environment and are protected from external threats (e.g. traffic) <p>The <i>Duty of Care Policy</i> outlines further procedures to ensure children's safety.</p>
Physical contact	<p>Any physical contact with students must be appropriate to the teaching or learning experience and based on the needs of the student. If physical contact is required, the person is to explain the purpose and type of contact to the student beforehand and seek their consent. Physical contact might be necessary for the purpose of:</p> <ul style="list-style-type: none"> • Injury management • To demonstrate a skill or for instructional purposes as part of an activity, or • To assist with toileting of young children <p>Under no circumstances should physical contact with students:</p> <ul style="list-style-type: none"> • Involve touching of genitals, buttocks or breast area • Appear to a reasonable observer to have a sexual connotation • Intend to cause distress or pain to a student • Be unnecessary • Be against the students wishes, except if such contact may be necessary to prevent physical harm or injury to the student or to others.

BEHAVIOUR	EXPECTATION
Transport of children	The <i>Duty of Care Policy</i> outlines procedures to ensure the safe transportation of students. Staff are not to transport students without the prior consent of the parent or guardian.
Management of illness and injury	Consent must be obtained from a parent or guardian prior to the administering of first aid or medication, as outlined in the <i>Managing Students Health Support Needs Policy</i> . Clear procedures are in place to manage injuries or illness sustained at School, with the health and safety of staff, students and visitors our priority. Parents/guardians are to provide the School with information regarding any allergies or medical conditions of the student. Staff are to ensure they are knowledgeable about these conditions and understand the procedure to follow in the event of an incident.
Behaviour management	The <i>Relationship Management Policy</i> aims to develop in student's self-discipline and a sense of responsibility for their own behaviour. Staff are to facilitate repair processes using restorative processes and language to deal with breakdowns in relationships or misbehaviour. To maintain good relationships, teachers are to set classroom expectations to establish the way that things are done. Teachers are to use the terms <i>expectation</i> and <i>consequence</i> rather than rules and punishment, which can have negative connotations.
Photographing children	The <i>Media, Communication and Marketing Policy</i> ensures procedures are in place relating to the use of images of students. Staff are not to take, publish or distribute photographs of students without the express consent of the parent or guardian.
Smoking, alcohol & use of medication and drugs	The School is a smoke free environment. Staff are prohibited from being adversely affected by alcohol or other drugs whilst at the workplace, and the possession of alcohol or prohibited drugs in the workplace. The <i>Alcohol, Smoking and Illicit Drugs Policy</i> sets clear guidelines for all stakeholders.
Use of technology and social media	The <i>Acceptable Use of Information and Communication Technology Policy</i> ensures the lawful, ethical, and appropriate use of ICT according to an employee's position and our values, policies and <i>Code of Conduct</i> . Students are to abide by the <i>Acceptable Use of Technology (Student) Policy</i> and the associated expected standards of behaviour.
Visitors	All visitors are to report to reception upon arrival to the School. There are processes in place for identifying and recording visitors to minimise and manage risks to our students.
Bullying, discrimination and sexual harassment	The School has a zero-tolerance policy to any form of bullying, harassment or discrimination, as outlined in the <i>Bullying, Harassment and Discrimination Policy</i> . We are committed to providing a safe, respectful and supportive environment for staff, students and volunteers.
Confidentiality of information	The <i>Upholding Confidentiality and Privacy Policy</i> commits staff and volunteers to upholding the privacy of personal information of all stakeholders. Staff and Committee members affirm their commitment to maintaining privacy and confidentiality through the signing of a <i>Confidentiality Agreement</i> .

This commitment is evidence of St John's Lutheran School's fulfilment of the requirements of the Schedule 1 S.2(2).

2 Recruitment, Selection, Training and Management Procedures

St John's Lutheran School is committed to recruiting, selecting, training and managing employees in such a way that limits risks to students. In particular, St. John's Lutheran School will:

- Ensure that its recruitment and selection procedures act to reduce the risk of harm to children from employees via:
 - Accurate role 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 or other pre-employment checks are 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.
 - Advertising the position with a clear statement about the School's commitment to safe and supportive work practices and identifying that candidates will be subject to a teacher registration check or Blue Card screening, a police check (for certain positions), referee checks, identification verification and the requirement to disclose any information relevant to the candidates' eligibility to engage in activities including children
 - A selection process that includes assessing the application via an interview process and referee and other checks (as identified above) based on the accurate role description, to assess a person's suitability to work in the role, to work with students and who will contribute to facilitating a safe and supportive environment for students
 - 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 training and management procedures act to reduce the risk of harm to students from employees via:
 - Management processes that are consistent, fair and supportive
 - Performance management processes to help employees to 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 external support and counselling services
 - An induction program which thoroughly addresses the school's policies and procedures, particularly its expectations regarding student risk management and to assist employees 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
 - handling a disclosure or suspicion of harm to a child
 - mandatory annual child protection training
 - Keeping a record of the training provided to employees
 - 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 St. John's Lutheran School's fulfilment of the requirements of the Schedule 1 s.2(3).

3 Handling Disclosures or Suspicions of Harm

Any of the types of concerns or reports below should be reported and managed under the St John's Lutheran School *Child Protection Policy* as follows:

- All staff with information alleging harm to a student
- All staff with concerns about sexual abuse or likely sexual abuse or a child sexual offence committed by an adult
- Teachers, nurses and early education and care professionals with concerns of sexual or physical abuse
- All staff who have received a report of inappropriate behaviour by another staff member.

All staff and visitors have a responsibility to respond when it is suspected that a student has been harmed or is at risk of harm.

Under legislation:

- All teachers have mandatory reporting obligations when they reasonably suspect a child has suffered, is suffering or is at risk of suffering significant harm caused by physical or sexual abuse and may not have a parent able and willing to protect the child from harm.
- All staff members have mandatory reporting obligations to immediately give a written report to the Principal, delegate or the Executive Director² of Lutheran Education Queensland when they become aware or reasonably suspect the sexual abuse or likely sexual abuse of a student under 18 years. The Principal, delegate or Executive Director of Lutheran Education Queensland must immediately give a copy of the report to the police.

To report any type of harm, all staff members must use the *Report of Suspected Harm or Sexual Abuse Form*.

Furthermore, and in accordance with section 76 of the *Education (Queensland College of Teachers) Act 2005*, the Principal of St John's Lutheran 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 relevant teacher at the school.

Any report made under this section, or the *Child Protection Policy* will fulfill the reporting obligations of all adults including students 18 years or older, parents/ guardians and volunteers under the *Criminal Code Act 1899*.

This commitment is evidence of St. John's Lutheran School's fulfilment of the requirements of the Schedule 1 s.2(4).

4 Managing Breaches of the Child Risk Management Strategy

St John's Lutheran 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*, *Code of Conduct Policy*, *Complaints Handling Policy* and Enterprise Bargaining Agreement or equivalent.

A breach is any action or inaction by any member of the School, including students, that fails to comply with any part of this strategy. The appropriate policies outlined above identify who is responsible for the management of each type of breach and the process for reporting breaches.

This is evidence of fulfilment of the requirements of the Schedule 1 s.2(5).

² The Lutheran Church of Australia Queensland District has delegated its director's reporting function under s366 and 366A of the Education (General Provisions) Act 2006 to the Executive Director, Lutheran Education Queensland in line with s 366B.

5 Implementing and Reviewing the Child Risk Management Strategy

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

The Principal will ensure that the *Child Risk Management Strategy* is reviewed at least on an annual basis and after any incidents to ensure that risks continue to be addressed and minimised throughout the School.

Any subsequent changes to policies and procedures as a result of this review will be communicated to all relevant stakeholders.

The introduction to this *Child Risk Management Strategy* and the “*Compliance and Monitoring*” section below state St. John's Lutheran School's commitment to reviewing the Strategy annually and are evidence of fulfilment of the requirements of the Schedule 1 s.2(6)(a) relating to review.

6 Blue Card Policies and Procedures

St John's Lutheran School is committed to acting in accordance with chapters 7 and 8 of the *Working with Children (Risk Management and Screening) Act 2000* (the Act) relating to the screening of employees in such a way that limits risks to children. Through the *Screening Adults Involved in Child Related Activities Policy*, the school is committed to upholding our mandatory responsibilities.

In particular, St John's Lutheran School will:

- Require relevant prospective or current employees, volunteers, trainee students and School Council members to have working with children authority in accordance with St. John's Lutheran School's *Screening Adults Involved in Child Related Activities Policy*, role descriptions and the Act. The School upholds the *No Card, No Start* law, which means workers and volunteers must have working with children authority **before** they can begin work at the School
- Check the validity of any currently held notices online through Blue Card Services
- Link the individual to the School online through Blue Card Services as they commence their engagement with the school
- Check the cardholder's identity by sighting appropriate identification
- Not allow a person to continue to work with children if their working with children authority is cancelled or suspended or a negative notice is received after a change of police information
- Let Blue Card Services know within 14 days if there are any changes to the School's details
- Submit the 'Delink a person from your organisation' form when a blue card or exemption card holder finishes employment or engagement at the School
- Have all relevant prospective employees and volunteers engaging in Restricted Employment acknowledge and sign the *Restricted Person Declaration Form* declaring they are not a restricted person prior to commencing their engagement
- Not allow a person relying on an exemption to continue to work with children if they become a restricted person
- Appoint a School contact person who will be responsible for managing the working with children screening process and all related documentation and records
- Keep written records of all the above actions, decisions and outcomes, including the dates of expiry for working with children authority
- Ensure that all information in relation to working with children authority is kept confidential
- Act to remind employees and relevant volunteers to keep their working with children authority up to date, including the requirement to submit a renewal application **before their current working with children authority expires** to be able to continue to work or volunteer at the School
- Take appropriate action if an employee, volunteer, trainee student or School Council Member fails to submit a renewal application prior to their working with children authority expiring

- Act to remind employees and relevant volunteers of their obligation to notify Blue Card Services when there is a change in their Police information.

This commitment is evidence of St. John's Lutheran School's fulfilment of the requirements of the Schedule 1 s.2(6)(b).

7 Management Plans for High Risk Activities and Special Events

St. John's Lutheran School is committed to identifying risks, assessing risks, eliminating and minimising risks and the monitoring of risk to the safety of students on an ongoing basis. This includes high risk activities or special events, where forward planning is used to identify risks and implement strategies and appropriate control measures to reduce the possibility of students and others being harmed.

High risk activities and special events include, but is not limited to, School camps and excursions, open days etc. Our *Duty of Care Policy* forms part of our approach to managing these risks.

Risks are managed according to the *Standards Australia's AS/NZS ISO 31000:2009 Risk management - Principles and Guidelines* as outlined in the St John's Lutheran School *Risk Management Plan*.

St. John's Lutheran 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 St. John's Lutheran School's fulfilment of the requirements of the Schedule 1 s.2(7).

8 Strategies of Communication and Support

St. John's Lutheran School is committed to making this *Child Risk Management Strategy* available to students, parents, volunteers, and employees, via our School website and School intranet site. The Staff Information Handbook provide basic information on the Strategy and how the Strategy can be accessed. Parent/guardian volunteers attending camps etc undergo mandatory child safety training and attend an information session in regard to their responsibilities. This is evidence of fulfilment of the requirements of the Schedule 1 s.2(8)(a).

The Principal will ensure that all people in the School are aware of their responsibilities and understand what acceptable behaviour is for interacting with students.

The School has implemented strategies to make sure students understand how to keep themselves safe and what to do if they feel unsafe.

St. John's Lutheran School is committed to training employees in relation to risks to students and will conduct this mandatory training regularly via annual formal training events, informal updates at staff meetings and regular discussions between the leadership team and staff. This is evidence of fulfilment of the requirements of the Schedule 1 s.2(8)(b).

9 Embedding a Child Safe Culture

Embedding and continually building a strong child safety culture is a priority for St John's Lutheran School, with the following strategies part of our approach:

- Child safety culture visible at governance and executive level
- Make a written public statement to child safety
 - Publicly available on website and external facing documents
 - Include in all child safety related documents
 - Include in recruitment processes and documents, making commitment clear to applicants

- Champion child safety at every opportunity
 - Ask questions and encourage open discussion across School
 - Include in meeting agendas, assembly, newsletters
 - Include questions about child safety in engagement surveys
 - Posters and information displayed around School about child safety
- Have a governing council fit for purpose
 - Membership with child safety knowledge, through training
 - Oversee School hierarchy with clear roles and responsibilities for child safety
- School leaders must model commitment to embracing student voice
 - Enable students to be heard
 - Enable School Council interactions with students
- Communicate with School community about policy and procedure
- Set standards of professional behaviour
 - Include child safety in *Code of Conduct*
 - Apply code to every adult at school, no exceptions
 - Adopt a zero tolerance to bullying
- Understand and manage risk
 - Not just for activities like camps and excursions
 - At a School level or systemic view of child safety risk
 - Ensure School Council reviews risk register periodically
- Be a feedback rich environment
 - Celebrate feedback, all different kinds
 - Make it as easy as possible for people of all abilities to give feedback
 - Act on feedback and ensure there is process for capturing, managing and reporting on all feedback
 - Track trends and ensure there are reporting thresholds for feedback to escalate to School Council where appropriate
- Equip people with knowledge about disclosure
 - Inform and train staff about what to do when a student discloses abuse or harm or if there are any concerns about a student's safety
 - Ensure process in place for internal reporting and external reporting to statutory or regulatory bodies
 - What information needs to be shared and what records retained

RESPONSIBILITIES

St John's Lutheran School is responsible for developing and implementing this *Child Risk Management Strategy* and related policies and procedures to ensure it fulfils its obligations.

All employees at St John's Lutheran School are responsible for acting in compliance with this *Child Risk Management Strategy* and related policies and procedures.

COMPLIANCE AND MONITORING

St John's Lutheran School is committed to the annual review of this Strategy or a review after an incident involving a student. St John's Lutheran School will also record, monitor and report to the School Council, the Leadership Team and others as appropriate at St John's Lutheran School regarding any breaches of the Strategy.

In addition, St John's Lutheran School is committed to other various compliance and monitoring arrangements made under relevant policies and procedures.

<p>Legislation / References:</p>	<ul style="list-style-type: none"> • <u>Child Protection Act 1999 (Qld)</u> • <u>Child Protection Regulation 2011 (Qld)</u> • <u>Criminal Code Act 1899 (Qld)</u> • <u>Education (Accreditation of Non-State Schools) Act 2017 (Qld)</u> • <u>Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)</u> • <u>Education (General Provisions) Act</u> • <u>Education (General Provisions) Regulation 2017 (Qld)</u> • <u>Education (Queensland College of Teachers) Act 2005 (Qld)</u> • <u>Education Services for Overseas Students (ESOS) Act 2000 (Cth)</u> • <u>Education (Overseas Students) Regulation 2018 (Qld)</u> • <u>Education and Care Services Act 2013</u> • <u>Education and Care Services National Law (Queensland)</u> • <u>Education and Care Services National Regulations</u> • <u>Working with Children (Risk Management and Screening) Act 2000 (Qld)</u> • <u>Working with Children (Risk Management and Screening) Regulation 2020 (Qld)</u> • <u>Child and Youth Risk Management Strategy Toolkit</u>
<p>Helpful Links</p>	<ul style="list-style-type: none"> • Independent Schools Queensland's <u>Child Protection Decision Support Trees</u> • Department of Child Safety, Youth and Women <u>Queensland Child Protection Guide</u> resource • <u>Blue Card Services Resources</u>

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 immediately	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 Regulation 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
Employing authority (Principal/School Council)	Harm or likely harm due to the conduct of a teacher	When you start to deal with an allegation; & When you finish dealing with an allegation	Queensland College of Teachers	QCT sections 76 and 77
Any member of the public	Any	Significant harm & Parent may not be willing and able	Child Safety	CPA section 13A
Any adult includes students 18 years or older, parents/guardians and volunteers.	A child sexual offence against a child by an 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