



Child Risk Management Strategy

Purpose:	The purpose of this strategy is to eliminate and minimise risk to student safety to ensure the safety and wellbeing of all students.	
Scope:	Students and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements.	
Status:	APPROVED	Supersedes: February 2021
Authorised by:	Board Chair	Date of Authorisation: June 2022
References:	<ul style="list-style-type: none"> • Working with Children (Risk Management and Screening) Act 2000 (Qld) • Working with Children (Risk Management and Screening) Regulation 2020 (Qld) • Child Protection Act 1999 (Qld) • Education (Accreditation of Non-State Schools) Act 2017 (Qld) • Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) • Education (General Provisions) Act 2006 (Qld) • Education (General Provisions) Regulation 2017 (Qld) • Education Services for Overseas Students (ESOS) Act 2000 (Cth) • Education (Overseas Students) Regulation 2014 (Qld) • Education (Queensland College of Teachers) Act 2005 (Qld) • Education and Care Services National Law (Queensland) • Education and Care Services National Regulations • Criminal Code Act 1899 (Qld) • Blue Card Services Child and Youth Risk Management Strategy Toolkit • Restricted Person Declaration Form 	
Review Date:	Annually	Next Review Date: June 2023
Policy Owner:	School Governing Body: Board of the Rudolf Steiner Education Group Brisbane	

1. Statement of Commitment

Samford Valley Steiner School (SVSS) 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 In practice, SVSS is committed to acting in accordance to 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 points.

2. Code of Conduct

SVSS Employee Code of Conduct is evidence of fulfilment of the requirements of Schedule 1 s.2(2) of the *Working with Children (Risk Management and Screening) Regulation 2020* (Qld) sch 1 (“Schedule 1”).

3. Recruitment, Selection, Training and Management Procedures

SVSS is committed to recruiting, selecting, training and managing employees in such a way that limits risks to students. In particular, SVSS will:

- Ensure that its recruitment and selection procedures act to reduce the risk of harm to children from employees 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.
 - 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, 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 position description.
 - 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 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.

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

- 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.
- 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 SVSS' fulfilment of the requirements of Schedule 1 s.2(3).

4. Handling Disclosures or Suspicions of Harm

Any of the types of concerns or reports below should be reported and managed under SVSS Child Protection Policy and Procedure, as follows:

- all staff with concerns about sexual abuse or likely sexual abuse
- teachers with concerns of 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 School director of SVSS 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 SVSS Child Protection Policy will fulfill the reporting obligations of all adults under the *Criminal Code Act 1899*.

This commitment is evidence of SVSS' fulfilment of the requirements of Schedule 1 s.2(4).

5. Managing Breaches of this Child Risk Management Strategy

SVSS 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 its Child Protection Policy, Employee Code of Conduct, Complaints Handling Policy and Procedures and Enterprise Bargaining Agreement or equivalent, and this is evidence of fulfilment of the requirements of Schedule 1 s.2(5).

6.1 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 Schedule 1 s.2(6)(a) relating to implementation.

The introduction to this Child Risk Management Strategy and the "Compliance and Monitoring" section below state SVSS' 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.

6.2 Blue Card Policies and Procedures

SVSS is committed to acting in accordance with chapters 7 and 8 of the Act relating to the screening of employees in such a way that limits risks to children. In particular, SVSS will:

- Require relevant prospective or current employees, volunteers, trainee students and school board members to have working with children authority, and check the validity and appropriateness of any currently held notices, in accordance with SVSS position descriptions and the Act prior to the commencement of their engagement.
- Not allow a person to continue to work with children if their working with child authority is cancelled or suspended or a negative notice is received after a change of police information.
- Have all relevant prospective employees and volunteers engaging in Restricted Employment acknowledge and sign a [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.
- Link and unlink individuals as they commence and conclude their engagement with the school and keep QCT and Blue Card registers up to date
- Appoint a school contact person who will be responsible for managing the working with child 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 to keep their working with children authority up to date and apply for a renewal prior to expiry.

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. This commitment is evidence of SVSS' fulfilment of the requirements of Schedule 1 s.2(6)(b).

7. High Risk Management Plans

SVSS' Risk Management Framework is evidence of fulfilment of the requirements of Schedule 1 s.2(7).

8. Strategies of Communication and Support

SVSS' commitment to making this Child Risk Management Strategy available to students, parents and employees via its staff induction procedures, school handbook, school website and Parent Lounge is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(a).

SVSS is committed to training employees in relation to risks to students and will conduct this training regularly via annual formal training events, informal updates at staff meetings and regular discussions between managers and their staff, and this is evidence of fulfilment of the requirements of Schedule 1 s.2(8)(b).

Responsibilities

SVSS 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 SVSS are responsible for acting in compliance with this Child Risk Management Strategy and related policies and procedures.

Compliance and Monitoring

SVSS is committed to the annual review of this Strategy. SVSS will also record, monitor and report to the school board, the Senior Leadership Team and others as appropriate regarding any breaches of the Strategy.

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

Related Documents

- SVSS Blue Card Register
- SVSS Child Protection Policy
- SVSS Complaints Handling Policy
- SVSS Complaints Handling Procedures
- SVSS Employee Code of Conduct
- SVSS Recruitment Procedures
- SVSS Restricted Person Declaration Form
- SVSS Risk Management Framework

Helpful Links

- Independent Schools Queensland's [Child Protection Decision Support Trees](#)
- Department of Child Safety, Youth and Women [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/organisations/compliance/risk-management-strategies-resources>

Appendices

- Appendix 1 – Summary of Reporting Harm
- Appendix 2 – Report of Suspected Harm or Sexual Abuse Form
- Appendix 3 – Failure to Protect – Section 229BB of the Criminal Code

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/Board)	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	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

Appendix 2

Private and Confidential

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:	Gender:
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:
School Director:	Signature:	Date:

School Director's email address: svssdirector@samfordsteiner.qld.edu.au

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 Children, Youth Justice and Multicultural Affairs (Child Safety Services)
	<input type="checkbox"/>	Family and Child Connect
	<input type="checkbox"/>	Queensland College of Teachers

(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

Failure to Protect

The Queensland Parliament has implemented recommendations made in the Criminal Justice Report of the Royal Commission into Institutional Responses to Child Sexual Abuse by introducing two new criminal offences that impose a positive duty on third parties to act in relation to child sexual abuse.

The Criminal Code (Child Sexual Offences Reform) and Other Legislation Amendment Act 2020 (Qld) amends the Criminal Code Act 1899 (Qld) (Criminal Code) and includes the new offences of:

- “Failure to protect child from child sexual offence” under section 229BB (Failure to Protect)
- “Failure to report belief of child sexual offence committed in relation to a child” under section 229BC (Failure to Report).

These offences commence operation on 5 July 2021, and will apply to certain people in Queensland, including people who work in government and non-government schools.

Failure to Protect

Under section 229BB of the Criminal Code, an adult (aged 18 or over) who is associated with an institution, including a school, (whether as an employee, contractor, volunteer or otherwise) will commit a criminal offence if they:

- know that there is a significant risk that another adult associated with the institution:
- will commit a child sexual offence
- in relation to a child (under 16 years of age, or 16 or 17 years of age but with impairment of the mind) under the care, supervision or control of the institution; and
- have the power or responsibility to reduce or remove the risk; and
- willfully or negligently fail to reduce or remove the risk.

In the school context, all staff members (whether teaching or non-teaching), members of the school’s governing body, volunteers and contractors are considered to be “associated with” the school.

Therefore, this offence means that action **must** be taken:

- by any staff, volunteer or contractor who has the power or responsibility to do so

- to protect students aged under 16, or students under 18 years of age with impairment of the mind
- from a known significant risk of sexual abuse that is posed by an adult staff member, volunteer or contractor at the school.

Whether a staff member, volunteer or contractor at the school has “power or responsibility to reduce or remove the risk” to the student will depend on their role at the school and on the source of the risk.

In a normal school context, the principal and members of the school’s leadership or management team would **always** have the necessary degree of supervision, power and responsibility to remove or reduce a risk posed by another adult working at the school. However, on a day-to-day basis, and on tours, excursions, or camps, others at a school may have the requisite power and responsibility.

Appropriate action that can be taken to protect students from a significant risk of a child sexual offence or a reasonably foreseeable risk of harm may include, for example:

- a current staff member, volunteer or contractor, who has direct contact with and is known to pose a risk of physical abuse to students, being immediately removed from contact with students and reported to external authorities
- a parent who is known to pose a risk of sexual abuse to students not being allowed to attend excursions as a parent helper.

The maximum penalty for this offence is five years imprisonment.

Failure to Report

Under section 229BC of the Criminal Code, any adult who gains information that:

- causes the adult to believe on reasonable grounds, or that ought reasonably to cause the adult to believe, that a child sexual offence is being or has been committed against a child by another adult; and
- at the relevant time, the child is or was:
 - under 16 years; or
 - a person with an impairment of the mind

must disclose the information to a police officer as soon as reasonably practicable after the belief is, or ought to reasonably to have been, formed. Failure to report this information to the Police without reasonable excuse is a criminal offence and carries a maximum prison term of three years imprisonment.

This obligation to report child sexual offences to the Police applies to **everyone** in Queensland aged 18 years or over, including all staff, volunteers, contractors and students aged 18 and over at a school.

The offence will not apply if the adult has a reasonable excuse for not reporting the information. Under the Criminal Code, a reasonable excuse includes:

- believing, on reasonable grounds, that the information has already been disclosed to a police officer
- making a mandatory report to Police or Child Safety Services under mandatory reporting laws or believing on reasonable grounds that another person has done so
- gaining the information after the alleged victim becomes an adult, and reasonably believing that the alleged victim does not want the information to be disclosed to a police officer
- having a reasonable belief that disclosing the information to a police officer would endanger your safety or the safety of another person, other than the alleged offender, regardless of whether the belief arises because of the fact of the disclosure or the information disclosed, and the failure to disclose the information to a police officer is a reasonable response in the circumstances.

Unacceptable reasons for not reporting include if you are concerned about the interests (including the reputation, legal liability or financial status) of:

- the person who may have committed a child sexual offence
- any organisation (such as a school).

Information gained by an adult during, or in connection with, a religious confession is not excluded from information that must be reported to Police.

The list of child sexual offences that are captured by the Failure to Report offence is extensive. It includes sexual offences such as rape, sexual abuse, sexual touching, the production of child abuse material, voyeurism and grooming offences or attempts to commit those offences.

What Should Schools Do?

Principals and members of the school's leadership or management team should not only note that these new offences impose – from 5 July 2021 – a positive duty on them to act in response to child sexual abuse, but should also ensure that staff, volunteers and contractors are informed of their obligation to report child sexual offences to the Police, and their positive duty to remove or reduce risks of child sexual abuse (in certain circumstances).