

Brisbane Catholic Education Child and Youth Risk Management Strategy

2025



**Brisbane
Catholic
Education**

teaching · challenging · transforming

Introduction

Brisbane Catholic Education (BCE) is committed to high quality learning and teaching for more than 78,000 young people enrolled in our schools and colleges from Prep to Year 12.

Our community of over 145 schools within the Archdiocese of Brisbane is founded on Christ and is at the service of our students, families, society and the Church – teaching, challenging and transforming.

BCE as the agency of The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane and delegate of the Archbishop of Brisbane, is deemed to be carrying on a regulated business in respect of each accredited or provisionally accredited school within the BCE system of schools.

In compliance with the requirements of the *Working with Children (Risk Management and Screening) Act 2000 (QLD)* and the *Working with Children (Risk Management and Screening) Regulation 2020 (QLD)*, BCE has developed a Child and Youth Risk Management Strategy (CYRMS) which references system wide policies and procedures which support the safety, protection and wellbeing of students. Each school under the governance of BCE has a CYRMS located on the school's website, contextualised to the individual school environment. BCE also has its own CYRMS available on its public website that incorporates the Brisbane Catholic Education Offices (BCEO).

As an agency of the Archdiocese, BCE honours the Safeguarding Commitment of the Catholic Archdiocese of Brisbane. The BCE CYRMS also adheres to the National Principles for Child Safe Organisations and the Catholic National Safeguarding Standards.

For further information regarding BCE's CYRMS please contact the Safeguarding Specialist on safeguarding@bne.catholic.edu.au or Phone: (07) 3033 7000.

1. Statement of Commitment



Alignment with National Catholic Safeguarding Standards:

- Standard 1: Committed Leadership Governance and Culture
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

BCE has adopted the Catholic Archdiocese of Brisbane Safeguarding Commitment Statement which is located on BCE's public website, in the BCE foyer of BCE Offices and the foyer of our schools.

BCE is committed to the safety and wellbeing of all students and young people within our schools and communities including Aboriginal and Torres Strait Islander children, those from culturally and linguistically diverse backgrounds and children with a disability. BCE respects and values the dignity, self-esteem and integrity of every child and young person, based on our Christian belief that children and young people are entrusted to us by the love of God.

"The protection of minors and vulnerable persons is an integral part of the Gospel message that the Church and all its members are called to proclaim throughout the world. Christ himself, in fact, has entrusted us with the care and protection of the weakest and defenceless: "whoever receives one child such as this in my name receives me" (Mt 18:5). Therefore, we all have the duty to welcome openheartedly minors and vulnerable persons and to create a safe environment for them, with their interests as a priority." (*Apostolic letter issued Motu proprio by Pope Francis on the protection of minors and vulnerable persons 2019*)

Safety and security are fundamental human rights and needs that, when met, allow students to reach their maximum potential for personal development and increase their personal resilience.

Making schools a safe place and nurturing a community of care and trust is an essential part of BCE's ethos and underpins our commitment to the protection of students. BCE is committed to ensuring that all students are protected from abuse and harm, and adheres to all legislative requirements including the *Child Protection Act 1999* (QLD) and the *Education (General Provisions) Act 2006* (QLD). BCE has zero tolerance of any form of child abuse, and all allegations and safety concerns will be treated seriously and consistently through BCE processes. The *Child and Youth Risk Management Strategy* and *Student Protection Processes and Guidelines Catholic Education Archdiocese of Brisbane* reflect the procedures used internally to build a strong culture of safeguarding to support the safety, protection and wellbeing of students. BCE strives to provide a culture where all employees acknowledge and understand that student protection is the responsibility of everyone. All employees are required to undertake mandatory training on an annual basis to ensure all students, employees, parents and the broader community feel safe in reporting harm and inappropriate behaviour.

Important in developing this culture is the education of students about personal safety and providing them with the knowledge and skills to understand and maintain their own personal safety. Further education on safety strategies and a focus by BCE schools on the safety and wellbeing of students is at the centre of every preventative and protective action taken.

BCE strives to empower all students and ensure their voice is heard by listening, taking their opinions seriously, particularly in relation to decisions that affect their lives, and addressing any concerns they may have. The BCE Student Voice Program is designed with this in mind – it is a systems led initiative complimenting schools to provide meaningful ways for students to have their say on ways to build and sustain safe school communities. We support the rights of children and young people, and we will act to ensure an environment where children and young people feel safe, respected, valued and empowered is maintained. In this regard we also acknowledge the cultural diversity of students and their families and the relevance of this in respect to student safety. Voice and agency are embedded within our Education Strategy.

BCE promotes an environment and culture of safety that is communicated to all employees and volunteers. BCE has policies, procedures and regular training in place that supports our employees and volunteers to achieve these commitments. In addition, all schools have selected employees nominated to act in the role of Student Protection Contacts (SPCs). These employees are available to assist students, parents, carers and employees.

BCE will continue to take measures and review our practices to protect children and young people and support their personal safety through the maintenance of safe environments and growing a culture of continuous improvement.

2. Code of Conduct



Alignment with National Catholic Safeguarding Standards:

- Standard 5: Robust Human Resource Management
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

In consultation with relevant parties, BCE has developed Codes of Conduct and standards of behaviour for employees, students, volunteers (including parents, clergy and religious) and other personnel. These codes of conduct set out BCE's requirements and expectations 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 in Catholic Education. Certain employees must also comply with other professional standards for their profession. The key documents are set out below.

2.1 BCE Employee Code of Conduct

- a. The Catholic Education Archdiocese of Brisbane Code of Conduct (Code of Conduct) sets out the standard of conduct and behaviour required of all employees of BCE in the performance of their duties. All BCE employees must comply with this Code of Conduct.
- b. This Code of Conduct gives particular attention to the requirement for those employees to act appropriately and professionally at all times in their interactions with students and observe appropriate physical, emotional and online boundaries with children. It further sets out employees' duties in relation to risk management and duty of care obligations to students.
- c. BCE reviews the Code of Conduct regularly and this is available on the public website and the BCE intranet SPIRE. BCE also provides employee training on the Code of Conduct and requires Principals and Managers to monitor completion of the online Code of Conduct training for employees. For new employees at the school this occurs at the time of induction and for all other employees this takes the form of annual ongoing training.

2.2 Volunteers and Other Personnel Code of Conduct

- a. BCE has a Volunteer and Other Personnel Code of Conduct which outlines the standard of behaviour, which is required of volunteers (including parents, clergy and religious) and other personnel. This code of conduct includes the need for volunteers and other personnel to think and act safely and to treat students, employees and other volunteers with respect.
- b. BCE requires volunteers who engage in activities with schools or the office to complete online training, a volunteer registration form and Statements of Responsibility for key volunteers.
- c. BCE requires the following regarding volunteer management
 - all volunteers and other personnel are able to access a copy of this Code of Conduct on BCE's public website
 - all volunteers and other personnel are required to comply with this Code of Conduct to continue their voluntary/professional engagement at the school
 - all volunteers and other personnel have completed Student Protection and Code of Conduct Training for Volunteers and Other Personnel via the online training module Volunteers/Other Personnel Training located on the BCE public website.
- d. All volunteers and other personnel must complete and sign a Volunteer and Other Personnel Register form. The form requires these persons to declare if they are unable to work with children due to any disqualification, suspension or other restriction in regard to their Blue Card, or if they are a disqualified or restricted person and/or have been charged with a disqualifying offence as set out in the *Working with Children (Risk Management and Screening) Act 2000*.

2.3 Student Behaviour Support Policy

- a. BCE schools use Multi-Tiered Systems of Support as the overarching framework to shape the approach to behaviour support. This is expressed through Positive Behaviour for Learning (PB4L) which focuses on creating positive, safe and supportive school climates where students can grow and learn. BCE school communities work together to establish expected safe behaviours and teach them to all students. The PB4L includes practices that aim to support a student to correct inappropriate or harmful behaviours towards other students, staff, other persons or the school environment. It also celebrates students achieving and demonstrating positive and safe behaviours.
- b. The Student Behaviour Support Policy and Procedure requires all BCE schools to develop a Student Behaviour Support Plan (SBS Plan) for their school (using the BCE approved template), in consultation with all groups in the school community; and to implement that plan for Positive Behaviour for Learning (PB4L), a whole school approach to support student behaviour in the school environment.
- c. BCE's SBS Plan for schools reflects the shared values and expectations of the school regarding student behaviour support and encourages a supportive and safe Catholic school environment for all. The SBS Plans of schools must include a student code of behaviour and information on formal sanctions and prevention and responding to bullying and harassment, guided by BCE's Student Behaviour Support policy and procedure. BCE requires all BCE schools to make the SBS Plan readily accessible to students and parents on the school's website. Resources have been developed to support schools, including the Managing Challenging Behaviour Procedure, Complex Case Management Process and a suite of professional learning resources for staff.
- d. BCE has developed the Engage Student Support System to track the behaviour of students and proactively support students' behaviour through data-informed decision making. Schools are required to use the Engage Student Support System to document bullying/harassment incidents, alcohol and other drug related incidents, weapons incidents and all suspensions (both in school and out) for a period of one day or more. Schools are required to note a part time suspension on the student's school file.

2.4 Code of Conduct for Parents and Visitors

- a. BCE has a Parent and Visitors Code of Conduct which clarifies and outlines the standards of behaviour expected of parents and visitors. It is designed to support the creation of learning and work environments where all people in our school community feel safe and respected.
- b. The Parent and Visitors Code of Conduct is accessible on BCE's Public Website.

2.5 Supplier Code of Conduct

- a. BCE has a Supplier Code of Conduct which outlines the expectation that our suppliers will act in a manner that is consistent with the principles for socially responsible, sustainable, and ethical business practices and that these principles are adopted throughout their supply chains. The code specifically outlines BCE's commitment to safeguarding and the expectation that supplier and/or their personnel will:
 - promote a culture of safety and comply with BCE safeguarding provisions in relevant Agreements
 - comply with requirements under the Queensland Blue Card Scheme pursuant to the *Working with Children (Risk Management and Screening) Act 2000*, including undertaking relevant screening and the development of their own Child and Youth Risk Management Strategy
 - not engage in inappropriate behaviour with a student
 - report concerns relating to students or an adult they must report this as soon as practical.
- b. The Supplier Code of Conduct is accessible on BCE's Public Website.

3. Recruitment, Selection, Training and Management



Alignment with National Catholic Safeguarding Standards:

- Standard 5: Robust Human Resource Management
- Standard 7: Ongoing Education and Training
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

3.1 Recruitment, selection and management of employees

- a. BCE's recruitment and selection processes aim to recruit and select employees who work with students in BCE schools who are appropriately qualified and suitable for working with children and young people.
- b. BCE schools are involved in employee recruitment, selection, training and management of employees in BCE schools in partnership with personnel from the BCE office. Principals and employees in BCE schools must comply with BCE's policies and procedures in relation to recruitment, selection, training and management of employees. These policies and procedures are published on the BCE intranet and include the Recruitment, Selection and Appointment Procedure and the Pre-employment Checks Procedure
- c. BCE adheres to the following requirements when engaging employees:
 - *Working with Children (Risk Management and Screening) Act 2000* (QLD)
 - *Working with Children (Risk Management and Screening) Regulation 2020* (QLD)
 - *Education (Accreditation of Non-State Schools) Act and Regulation 2017* (QLD)
 - *Education (Queensland College of Teachers) Act 2005* (QLD); and
 - National Catholic Safeguarding Standards when engaging employees.
- d. BCE takes screening seriously and requires all:
 - non-teaching employees working in BCE schools, comply with BCE Working with Children Check (Blue Card Screening) Procedure
 - non-teaching employees, volunteers and trainee students who work with students and who require a Working with Children Card (Positive Notice Blue Card) under the *Working with Children (Risk Management and Screening) Act 2000*, are required to obtain a Working with Children Card (Positive Notice Blue Card) prior to commencement of work/volunteering at the school and keep it current
 - non-teaching employees to ensure they hold a current Working with Children Card for the entirety of their employment with BCE
 - teachers to produce evidence of current teacher registration with the Queensland College of Teachers (QCT) before they commence work in BCE schools and maintain current registration for the entirety of their employment with BCE.

3.2 Training of Employees

- a. BCE provides training for all new employees through an induction process at BCE Office and at BCE school level. BCE also provides further ongoing training for all employees.
- b. To support BCE schools to provide an environment that is safe and supportive for students, 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. BCE also 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.
- c. All employees who work in BCE schools and BCEO must complete mandatory training in BCE's student protection processes, annually. Student protection training covers BCE's requirements under the Student Protection Processes and Guidelines in relation to reporting by employees of knowledge or

reasonable suspicions of:

- sexual abuse/likely sexual abuse of children under the age of 18
- harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse or neglect
- inappropriate behaviour of staff towards students; and
- failure to protect a child or report abuse.

This training provides BCE employees who work with students with skills to effectively respond to and report knowledge or suspicions of the above matters, as required by law. In addition, BCE have mandatory induction training for newly appointed Student Protection Contacts and refresher training (every 2 years) and advanced skills training (every 4 years) to ensure the highest level of training and skill in receiving and managing disclosures from students and supporting others in the school community to protect students.

- d. Mandatory Privacy and Data Breach Awareness training is undertaken by all employees annually as part of a suite of core compliance courses.
- e. Additional on-going training is provided by BCE and employees are encouraged to attend. 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, behaviour support for students, students at risk of harm, and students with disability.
- f. Where there is a complaint or allegation of inappropriate behaviour, misconduct or unsatisfactory performance against a BCE employee, BCE takes all appropriate management action, which may include requiring employees to undertake additional training or mentoring or reinforcing BCE's expectations. Additional disciplinary action including warnings and termination of employment may also be undertaken.
- g. BCE promotes the capacity of employees to contribute to the mission of our organisation through ongoing professional development and professional learning. The BCE People Policy, and the People Performance Framework, which is undertaken at all levels throughout the organisation guides individual performance and development. The Leadership Capability Framework articulates the requirements for BCE employees to model and promote a culture where student protection is the responsibility of everyone.
- h. BCE provides further professional development for employees to enhance student wellbeing and safety. This is done through making available relevant policies, processes and resources to support the pastoral care and wellbeing of students. These are readily accessible to BCE employees on BCE's intranet. Principals are expected to provide informal training, from time to time, at staff meetings and "in service" days, so that employees at the school are aware of BCE's policies and procedures.
- i. 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 employees to provide pastoral care, personal safety strategies, support for marginalised students and support for students who may be at risk of being harmed.
- j. The BCE Inclusive Education and Student Wellbeing Team provides training and information to schools, for example:
 - training delivered for middle leaders (pastoral) in Youth Mental Health First Aid, Suicide and Self-Harm conversations
 - webinars delivered for school staff on Vaping and Transition to Prep
 - training delivered for school teams on Restorative Practices by external consultant
 - video published on Spire – Eliminating Harassment & Victimisation for students with disability
 - vaping resources updated on Spire; and
 - specific training for school Guidance Counsellors and Support Teachers Inclusive Education for example how to respond to students who present with challenging behaviours; Suicide risk assessment; and provision of a support plan to use for students with eating disorders.

3.3 Management of Employees

- a. Employee's behaviour at the BCE Office is managed by the relevant employee's manager with the support of the People & Culture team as needed.
- b. Principals have the responsibility for the management of an employee's behaviour at a school in the first instance and with the support of BCE when appropriate. Appropriate employee behaviour includes recognising behaviour and work practices that champion student safety and respect as well as responding promptly to any behaviours or practices that do not support student safety or is, or likely to be, harmful or abusive to a student.
- c. The process for managing employee's includes annual appraisals, goal setting, recognition and awards, performance enhancement and management, complaint management and disciplinary procedures when relevant.
- d. Where there is a complaint or allegation of inappropriate behaviour, unsatisfactory performance or misconduct involving a student or other child, made in relation to an employee, the relevant BCE Manager or Principal will follow the Workplace Complaints Procedure, the Employee Misconduct Procedure and the Student Protection Processes and Guidelines that set out a clear and consistent process for handling the complaints and allegations of misconduct.
- e. BCE provides the Employee Assistance Program to provide free and confidential counselling to employees who require support. In addition, a Client Care Service has been introduced for those employees who may be subject to an investigation process.
- f. BCE promotes the capacity of employees to contribute to the mission of our organisation through ongoing professional development and professional learning. The BCE Performance and Development Policy, and the Planning and Performance Framework, guide individual performance and development which is undertaken at all levels throughout the organisation. Both the Catholic Identity and Leadership Capability Framework articulates the requirements for BCE employees to model and promote a culture where student protection is the responsibility of everyone.

3.4 Managing volunteers and other personnel, engaged by the school to provide a service to students, e.g. parent or other volunteers, clergy, religious and certain contractors

- a. Volunteers and other personnel include parents, legal guardians, carers, clergy, religious and certain contractors. The following points outline how BCE manages volunteers and other personnel engaged by a BCE office or school to provide a service to students.
- b. In the life of BCE and its school activities, it is common for volunteers, parents/legal guardians, clergy, religious, guest speakers and individual contractors (such as swim instructors and music teachers), to support the education of students by the school engaging such persons in school activities with students. Consistent with section 2 of this CYRMS, BCE ensure such persons are appropriately screened, trained, supervised and supported to carry out those roles safely with students and all involved.
- c. To ensure these opportunities and activities are a safe and positive experience for students and all involved, the BCE Manager and/or Principal engaging the volunteer or other personnel is responsible for ensuring that the requirements under section 2.2 and 3.3 above in this strategy document are adhered to. This includes ensuring the relevant persons have access, and adhere to, the Volunteer and Other Personnel Code of Conduct, receive induction training and that relevant screening requirements are completed.
- d. The relevant BCE Manager and/or Principal is further responsible for ensuring that the necessary directions and support are provided to volunteers and other personnel so they may carry out their role. This includes ensuring they are aware that they are expected to report any concerns about student safety or abuse/harm under the Volunteer and Other Personnel Code of Conduct and they know who to report these concerns to.
- e. 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 BCE or one of its schools, play their role in maintaining a safe environment for students.
- f. The BCE Manager and/or Principal is responsible for responding to any concerns, allegations or

complaints arising from the behaviour of a volunteer or other personnel and reporting any such behaviour, if required, to BCE and/or relevant external authorities.

- g. The student's safety and wellbeing is a paramount concern when responding to a concern, allegation or complaint involving a student.
- h. If a concern/allegation/complaint involves a person from an external organisation, (such as a member of clergy, a religious, an agency contractor), BCE will engage with the relevant authority for that person; for example the relevant leader of a Catholic Diocese or Religious Congregation, the Head of another faith entity or a Director of a camp or retreat centre.

4. Reporting Disclosures and Suspicions of Harm



Alignment with National Catholic Safeguarding Standards:

- Standard 2: Children and Adults are Safe, Informed and Participate
- Standard 5: Robust Human Resource Management
- Standard 6: Effective Complaints Management
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

This section relates to policies and procedures for how BCE responds to disclosures, concerns or suspicions of harm to a student.

4.1 Student Protection Processes

- a. BCE's Student Protection Processes and Guidelines provide a process for all employees 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 towards students.

The processes also outline that it is a crime:

- for certain people not to protect a child from a known risk of sexual offending; and/or
 - to fail to report sexual offending against a child in the absence of a reasonable excuse.
- b. Training in relation to how these laws apply in BCE Offices and BCE schools and the procedures for responding to any such matter are provided to all employees as set out above in this document.
 - c. The Student Protection Processes and Guidelines have been developed in accordance with the requirements of the following:
 - *Education (Accreditation of Non-State Schools) Act and Regulation 2017*
 - *Education (General Provisions) Act 2006 and Regulation 2017*
 - *Working with Children (Risk Management and Screening) Act 2000*
 - *Working with Children (Risk Management and Screening) Regulation 2020*
 - *Child Protection Act 1999*
 - *Education (Queensland College of Teachers) Act 2005.*
 - d. The Student Protection Processes and Guidelines have been developed in accordance with legislative requirements, satisfy relevant requirements under the *National Catholic Safeguarding Standards* and are underpinned by the *Student Protection Policy (2020)*. The Student Protection Processes and Guidelines Catholic Education Archdiocese of Brisbane document is reviewed and republished in keeping with the Queensland Catholic Education Commission template that was developed in collaboration with BCE and other Catholic employing authorities. The BCE processes are approved by the Non-State Schools Accreditation Board.
 - e. The Student Protection Processes and Guidelines are readily available for employees, parents, students and carers on the BCE public website. BCE requires that all BCE schools have the link to the Student Protection Processes and Guidelines on their own school website. Schools are required to complete a local school-based flowchart to ensure all employees understand how a student protection concern is to be communicated and managed in accordance with the Student Protection Processes and Guidelines.

4.2 Reporting

- a. BCE employees have received ongoing training, to reinforce that the protection of students and reporting of concerns/allegations is everyone's responsibility.

- b. On receipt of a disclosure or suspicion of harm to a student a decision is made as to whether a State Authority Report is required. If such a report is required, the following will occur:
 - reports are made to the Department responsible for Child Safety for matters involving harm/risk of harm to a child caused by sexual abuse, physical abuse, emotional abuse or neglect where there may not be a parent able and willing to protect the child
 - reports are made to the Queensland Police Service in relation to allegations or reasonable suspicions of sexual abuse/likely sexual abuse of a student
 - reports required under the *Criminal Code Act 1899* which are not made under which are not made under the *Child Protection Act 1999* or the *Education (General Provisions) Act 2006* are made to the Queensland Police Service. A dedicated form has been developed to assist adults to meet their responsibility to report a child sexual offence.
- c. If a disclosure or suspicion of harm relates to inappropriate behaviour of a paid employee, a volunteer or other personnel, at a BCE office or school towards a student, the matter will be reported and managed in line with BCE policies and procedures as appropriate.
- d. BCE provides training for employees on how to respond to disclosures and suspicion of harm. This includes:
 - relevant training for the Student Protection and Employment Relations Teams at BCE who may be receiving such disclosures
 - annual mandatory Student Protection Training for all school-based employees. The Principal of each school ensures that all employees are compliant with this training
 - annual mandatory Student Protection Training for all office-based employees. The Manager of each office team ensures that all employees are compliant with this training
 - all volunteers and other personnel are informed of how to raise a concern if they hear about, or receive any information in any other form, that may involve a disclosure or suspicion of harm to a student. Further, they are required to complete the Student Protection and Code of Conduct Training for Volunteers and Other Personnel (also refer to section 2.2 above).
- e. BCE has developed an electronic system to enable employees to complete online 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. The system also facilitates electronic submission of State Authority Reports to the relevant state authority.
- f. BCE has developed a complaints procedure to enable students, parents, guardians and others to make a complaint that a BCE school or BCE has not complied with the Student Protection Processes and Guidelines. Students, parents, guardians or others may make a complaint via the Record of Complaint about Non-Compliance with BCE's Student Protection Processes and Guidelines located on BCE's public website. BCE 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 and Guidelines.

4.3 Accessibility of Information

BCE ensures information is accessible to students, parents, employees, and volunteers and other personnel, to inform them on how to raise a concern, allegation or complaint involving the safety of a student. This includes:

- a. The Student Protection Processes and Guidelines are readily available for employees, parents, students and published on every school website and the BCE public website.
- b. BCE has processes to enable employees to document and report student protection concerns and inappropriate behaviour of staff members, volunteers, or other personnel towards a student (see section 4.2).
- c. BCE has a complaints procedure to enable student, parents, guardians, or others to make a complaint that the school has not complied with the Student Protection Processes and Guidelines. This policy publicly accessible via the BCE public website (see section 4.2).

- d. BCE has personnel based in each school who can provide support to students who may be vulnerable to raise a concern, allegation or complaint. This includes the Support Teacher – Inclusive Education and Guidance Counsellor.

4.4 Support for Students and Families

BCE has available supports, if required, for students, families and staff if they are personally impacted by a disclosure or suspicion of harm. It may be appropriate that such supports are provided through the school or BCE resources, or external supports may be required.

4.5 Specific Support Roles

Student Protection Contacts in Schools

- a. In accordance with the *Education (Accreditation of Non-State Schools) Regulation 2017*, BCE has at least two staff members in every school to whom a student can report behaviour of another staff member that the student considers is inappropriate. They are known as Student Protection Contacts.
- b. The Principal is one of the Student Protection Contacts at each school. Other Student Protection Contacts are suitable staff members at the school. These nominated persons may be contacted through each school's office. 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. The identity of Student Protection Contacts is made known to employees, students, volunteers and parents of each school by the publishing of relevant staff members details on the school's website and through other means such as school newsletters, posters in the school and at parent information nights.
- c. Information about the Student Protection Contacts and requirements for their appointment is detailed within the BCE's Student Protection Processes and Guidelines.
- d. BCE provides regular training to the Student Protection Contacts to carry out their role.

Employee Relations and Student Protection Team

- a. BCE's Employee Relations and Student Protection Team are a support resource for BCE schools and have expertise in the field of risk assessment and risk management, child protection and staff professional standards. This team:
 - assists our school and office based employees to identify whether there is a reasonable suspicion of abuse, harm and/or staff other inappropriate behaviour towards a student
 - offers support and guidance during and after a matter involving student protection and/or staff inappropriate behaviour
 - assists our school based employees to appropriately report and refer families to the Department responsible for Child Safety and/or the Queensland Police Service
 - develop and facilitate professional learning for our school-based employees.

5. Managing Breaches



Alignment with National Catholic Safeguarding Standards:

- Standard 6: Effective Complaints Management
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

- a. BCEO and each BCE school both have their own CYRMS. BCEO and each BCE school takes any breach of the CYRMS seriously.
- b. BCE has a Student, Parent and Guardian Complaints Management Policy and Procedure which is accessible on each school and BCE website or by contacting the school Principal. Under this process, any breach of the Strategy may be dealt with as follows:
 - if the alleged breach relates to the actions of an employee, this will be managed, as appropriate, in accordance with the Workplace Complaints Management Procedure, the BCE Employee Misconduct Procedure or Managing Employee Unsatisfactory Performance Procedure
 - if the alleged breach relates to a report of inappropriate behaviour of a staff member towards a student, this will be managed in accordance with the process set out in the Student Protection Processes and Guidelines
 - if the breach relates to a complaint made via the Record of Complaint about Non-Compliance with BCE's Student Protection Processes and Guidelines, that complaint will be dealt with in accordance with the Procedure for Handling Complaints about Non-Compliance with BCE's Student Protection Processes and Guidelines
 - if the breach relates to the actions of a volunteer or other personnel, it will be dealt with similarly to the procedures set out in the Student Protection Processes and Guidelines or complaints procedures, as appropriate; and
 - if the breach relates to the action of a contractor this will be managed in accordance with BCE's contract with the contractor.
- c. Details regarding management of any breach, including who manages the breach, are contained in the procedures mentioned above. All records about individual concerns or incidents are kept confidentially in BCE business information systems.
- d. BCEO monitors serious breaches of policies and procedures, identifying any system improvement to policies, procedures, or training and address any additional training requirements for individuals.

6. Risk Management Plan for High-Risk Activities



Alignment with National Catholic Safeguarding Standards:

- Standard 8: Safe Physical and Online Environments
- Standard 10: Policies and procedures support the safety of children and adults

This section relates to how BCE identifies and manages risks to students through risk management plans and responds to any breach of those plans or the CYRMS.

6.1 Regular Strategies to Minimise Risks of Harm

- a. BCE offers Risk Management training which is undertaken by all employees every two years as part of a suite of training courses.
- b. BCE requires all BCE schools to consider all school activities in terms of their inherent level of risk. When undertaking a medium or high-risk activity or event, BCE and its schools are responsible for identifying potential risks and considering the safety and wellbeing of students and the risk of harm to students.
- c. 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 are provided for the use of BCE schools on BCE's intranet.
- d. BCE schools undertake regular risk assessments and management strategies as part of their daily education program during school days and activities. School policies and procedures are reflective of those. In this regard, BCE schools apply the Australian standards for risk assessments, and school risk assessments are supported by relevant BCE policies and procedures. Further information about risk assessments is available through the school Principal.
- e. The record of each risk assessment and risk management plan undertaken are kept at the school so they may be properly followed, and are subject of internal BCE checks, and available for Blue Card Services to review/audit if requested.
- f. The school's regular risk assessments include, but are not limited to, the following:
 - adequate supervision of students
 - supervision arrangements
 - playground supervision
 - drop off and collection of children
 - procedure followed in the event a child is not collected
 - procedure to be followed in the event a person responsible for the collection of a child is deemed unable (for example, intoxication)
 - emergency and critical incidents
 - fire/lockdown incidents
 - engaging with and managing visitors/outside
 - use of media/communications
 - use of computer/internet
 - guidance counselling services
 - transport of students by staff
 - transporting of students by students
 - injuries, allergies or illnesses.

6.2 A risk management plan for high-risk activities and special events

- a. When undertaking a high-risk activity or special event (for example a fete, overnight camp/retreat), BCE expects the school to identify any specific potential risks relevant to that activity in the risk assessment undertaken and consider mitigating strategies for the safety and wellbeing of students and to reduce the risk of harm to students. This is documented in the risk management plan for each high-risk activity and held at the school.
- b. BCE schools refer to information in relation to risk assessments for various activities and risk assessment tools provided on BCE's Intranet, Spire.
- c. Information about the risk assessments for high-risk activities is accessible by contacting the Principal.

- d. 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 each 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 the schools and support the Principal in carrying out the health and safety responsibilities under legislation. BCE provides training and updates to the WHSO.
- d. In developing a high-risk strategy/plan the following is taken into consideration the context of the activity or event including:
- the nature of the activity and the objectives in conducting it
 - the environment or location of the activity
 - the stakeholders involved in the activity including children and young people
 - the specific risks and the control measures that are already in place and whether additional controls are required.
- e. If relevant, the following issues are also considered:
- transportation
 - toileting/change room procedures
 - ensuring appropriate supervision of children and ratios of adults to children
 - ensuring appropriate supervision of volunteers
 - a media consent process in relation to photographs
 - managing medications and allergies
 - managing illness/injury
 - emergency/lockdown procedures
 - relevant consent forms, including emergency contact details
 - procedures or processes applying to visitors
 - any risks presented by the physical environment or activity
 - accommodation and supervision requirements.
- f. The school’s risk assessments for high-risk activities are kept at each school so they may be properly followed and are subject of internal BCE checks and available for Blue Card Services to review/audit if requested.

6.3 Risk Management for Excursions and Fetes as high-risk activities:

Principals are responsible for approving all excursions and fetes. Key elements include:

- a. The Principal has access to BCE forms and fact sheets to assist in identifying, assessing and managing risks associated with excursions, for example, the Excursion Safety Procedure, and Excursion and Incursion Risk Assessment Guideline, an OH&S Fact Sheet: Excursions, OH&S Standard - Risk Management Form and the Risk Assessment Template Form.
- b. The Principal completes 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.
- c. The Principal utilises BCE’s procedures and resources to assist in planning for the safety of students participating in international travel.
- d. The Principal completes the BCE Fete Safety Planning prior to a fete taking place. This Fete Safety Planning Checklist assists the Principal in managing the health and safety risks of conducting a fete.
- e. The Principal accesses links to relevant information provided on BCE’s Health and Safety Portal, to assist in the risk assessment and management process, including the Fireworks Checklist, Mobile Amusement Device Checklist, Contractors Workplace Health and Safety Agreement and information on the hygienic handling of food.
- f. The Principal uses a Contractor Agreement – School Fete which among other things warrants that all the contractor’s personnel and approved subcontractors who interact with children and young people at the Fete hold a current Positive Notice Blue Card and it has no knowledge or reason to believe that any of its personnel or approved subcontractors may have acted inappropriately towards children or young people.

7. Managing Compliance with the Blue Card System



Alignment with National Catholic Safeguarding Standards:

- Standard 5: Robust Human Resource Management
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

To support BCE's safeguarding commitment and practices BCE ensures consistent application of its legal requirements under Chapter 7 and 8 of the *Working with Children (Risk Management and Screening) Act 2000*. This includes consistency in our management of the working with children card for BCE Officers and BCE schools and ensuring we have strategies in communication and support to members of the school community.

7.1 Working with Children Card (Positive Notice Blue Card) Requirements and Employee and Volunteer Register

- a. BCE's Working with Children Check (Blue Card Screening) Procedure details BCE's requirements in accordance with the *Working with Children (Risk Management and Screening) Act 2000* to ensure that required personnel hold a Working with Children Card (Positive Notice Blue Card). The Procedure is reviewed on a cyclical basis or as changes to legislation or BCE processes occur. BCE requires BCE schools and Principals, and relevant BCEO employees, to comply with the requirements of the Procedure. Blue Card information and school registers are checked to ensure schools are meeting compliance requirements.
- b. BCE requires all non-teaching employees, volunteers (unless exempt) and trainee students who work with children under 18 years of age to obtain a working with children clearance and hold a Working with Children Card (Positive Notice Blue Card) before an offer of employment/engagement is made and prior to working with children. The 'No Card, No Start' provisions apply to:
 - all school-based BCE employees who are not registered with either the Queensland College of Teachers or the Australian Health Practitioner Regulation Agency
 - volunteers (who are not parents of children attending the school)
 - preservice teachers undertaking practical experience 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, 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.
- c. BCE records Working with Children Card (Positive Notice Blue Card) information for all paid employees.
- d. BCE requires schools to use the Blue Card Services Organisation Portal to link all employees and volunteers required to hold a Working with Children Card (Positive Notice Blue Card) to their school. Schools are also required to take reasonable steps to check a card holder's identity and maintain a register of all employees required to hold a Working with Children Card (Positive Notice Blue Card) and all volunteers.
- e. All persons employed as teachers by BCE must be registered with the QCT. Principals are required to confirm current QCT registration.
- f. BCE Office and BCE schools must maintain a register for all volunteers including those who are exempt from holding a Working with Children Card (Positive Notice Blue Card). This will generally be volunteering parents of a child attending the school although at times may be religious, clergy or other personnel. Volunteers who require a Working with Children Card (Positive Notice Blue Card) under the *Working with Children (Risk Management and Screening) Act 2000* must obtain the Working with Children (Positive Notice Blue Card) before commencing volunteer work and need to be linked by the school via the Blue Card Services Organisation Portal.

8. Communication and Support



Alignment with National Catholic Safeguarding Standards:

- Standard 2: Children and Adults are Safe, Informed and Participate
- Standard 3: Partnering with Families, Carers and Communities
- Standard 9: Continuous Improvement
- Standard 10: Policies and Procedures Support the Safety of Children and Adults

- a. To ensure accessibility and supportive information on the CYRMS, the BCE CYRMS is uploaded on BCE's public website. BCE schools publish their own individual CYRMS on the individual school website as relevant for that school and its community.
- b. BCE has developed resources to assist BCE schools and Principals in implementing and communicating the BCE CYRMS to parents, employees, volunteers and other personnel. The resources include:
 - briefing materials which Principals can use to brief parents and students on BCE's CYRMS, which would be suitable for newsletters or parent information nights;
 - a framework for the CYRMS which may be adapted and completed by BCE schools for use in their schools; and
 - training materials for BCE school-based employees on BCE's CYRMS.

8.1 Procedures for reviewing the CYRMS

- a. To ensure that BCE's Child and Youth Risk Management Strategy remains current and effective, this strategy is monitored and reviewed annually. If BCE identifies concerns, particularly following a safeguarding incident, BCE's CYRMS will be reviewed.
- b. The review is documented and involves a range of stakeholders and considers whether BCE policies and procedures were followed, the response to any safeguarding incidents managed under the CYRMS and the content and frequency of training in relation to BCE's CYRMS.
- c. Following the review, the BCE CYRMS document is published on the BCE public website for accessibility to employees, students, parents, and volunteers.



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