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# **BRISBANE CATHOLIC EDUCATION CHILD AND YOUTH RISK MANAGEMENT STRATEGY**

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## **Preamble**

Brisbane Catholic Education (BCE) is committed to high quality learning and teaching for more than 70,000 young people enrolled in our schools and colleges from Prep to Year 12.

Our community of over 140 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 BCE school.

In compliance with the requirements of the Working with Children (Risk Management and Screening) Act 2000 and the Working with Children (Risk Management and Screening) Regulation 2020, BCE has developed a Child and Youth Risk Management Strategy (CYRMS) which references system wide policies and procedures which support the safety, protection and well-being of students. Each school under the governance of BCE has a CYRMS located on the school's website, contextualised to the individual school environment. For further information regarding BCE's CYRMS please contact the Manager of Professional Standards and Student Protection at [professionalstandards&studentprotection@bne.catholic.edu.au](mailto:professionalstandards&studentprotection@bne.catholic.edu.au)

## **PART 1 - COMMITMENT**

### **Statement of Commitment (*mandatory requirement 1*)**

BCE is committed to the safety and wellbeing of all students and young people within our schools and communities including indigenous children, those from culturally and linguistically diverse backgrounds and children with disabilities. 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 the school 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* and the *Education (General Provisions) Act 2006*. 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 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. Training is provided to all employees 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 and taking their opinions seriously, particularly in relation to decisions that affect their lives and addressing any concerns they may have. The BCE Student Voice Project is designed with this in mind – 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 we will act to ensure an environment is maintained where children feel safe, respected, valued and empowered. We acknowledge the cultural diversity of families and are sensitive to how this may impact on student safety.

BCE promotes an environment and culture of safety that is communicated to all school employees and volunteers. Employees and volunteers undertake annual, online training to enable them to enact their legal, policy and pastoral responsibilities to provide a proactive, safe environment that identifies risks early and takes action to eliminate or mitigate risks, and to respond appropriately to student protection concerns. 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 maintain their personal safety through maintenance of safe environments and growing a culture of continuous improvement.

## **Codes of Conduct** (*mandatory requirement 2*)

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

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

### **BCE Employee Code of Conduct**

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

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

BCE reviews its Code of Conduct and has online training materials. The Code of Conduct is available on the Public Website and the BCE Intranet, Spire. BCE requires Principals and Managers to monitor completion of the online Code of Conduct training for employees at the time of induction for new employees and annually for all other employees.

## **Student Behaviour Support Policy**

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

BCE schools use Positive Behaviour for Learning (PB4L) – a framework for creating positive, safe and supportive school climates where students can grow and learn. Our school communities work together to establish expected behaviours and teach them to all students.

BCE's Student Behaviour Support Plan for schools must reflect the shared values and expectations of the school to student behaviour support and maintain a supportive Catholic school environment. The Student Behaviour Support Plan must include a student code of behaviour and include information on formal sanctions and the 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 Student Behaviour Support Plan readily accessible to students and parents on the school's website.

BCE has developed the *Engage Student Support System* which supports schools to track the behaviour of students and use data-based decision making to proactively support student's behaviour. Schools are required to use the *Engage Student Support System* registers 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.

## **Volunteer and Other Personnel Code of Conduct and Registration**

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

In addition, BCE has developed an interactive online training module, [Volunteers/Other Personnel Training](#), located on the BCE Public Website and a Volunteer Register form and Statements of Responsibility for key volunteers to assist volunteers who engage in activities with schools.

BCE requires BCE schools to ensure that:

- the BCE Volunteer and Other Personnel Code of Conduct is implemented in the school community;
- all volunteers and other personnel are able to access a copy of the Volunteer and Other Personnel Code of Conduct;

- all volunteers and other personnel comply with the school's Volunteer and Other Personnel Code of Conduct to continue their voluntary/professional engagement at the school;
- all volunteers and other personnel have completed Student Protection and Code of Conduct Training for Volunteers and Other Personnel via the online training module located on the BCE public website; and
- All volunteers and other personnel complete and sign the Volunteer and Other Personnel Register form and submit to the school principal. The form requires a volunteer to declare that they are not:
  - A negative notice holder disqualified from holding a Working with Children Card (Positive Notice blue card) under the Working with Children (Risk Management and Screening) Act 2000
  - A person with a current suspended Working with Children Card (Positive Notice blue card) under the provisions of the Working with Children Act (Risk Management and Screening) Act 2000
  - A disqualified person within the meaning of the Working with Children (Risk Management and Screening) Act 2000
  - A person with a charge for a disqualifying offence within the meaning of Working with Children (Risk Management and Screening) Act 2000.

### **COVID 19 and Alternative Education Provision (AEP)**

BCE responded to the challenges emanating from the global pandemic, implementing government guidelines and developing resources for use by schools to promote the safety and wellbeing of students in relation to both COVID-19 and the implementation of AEP. The BCE Critical Incident Management Team was deployed, and a School Engagement Team established to support local school based Critical Incident Management Teams.

Microsoft Teams was established as the platform used to: facilitate AEP including home-based learning; and build collaboration and connection providing alternative facilitation of liturgies, staff meetings, assemblies and school tours.

The following are examples of resources, protocols and management practices developed or modified and implemented:

- scripts for newsletters, portals and websites about student, staff and parent well-being
- COVID specific and other mental health resources sent to all schools for distribution to all students and parents/guardians
- BCE *Message of Hope Initiative* implemented throughout Easter
- guidelines provided to schools on requirements for daily checks with students participating in AEP
- safety guidelines written for use of Microsoft Teams e.g. restrictions regarding one-on-one interactions
- Guidelines implemented for Guidance Counsellor safe practices in schools using telehealth and for psychoeducational assessments, including consent guidelines and forms.
- instructions provided on revised protocols for guidance counsellor, specialist teacher and contractor interaction with students during AEP
- staff required to work from home provided with checklists, protocols and expectations
- revised supervision guidelines provided to schools for students learning onsite
- requirements provided to schools for visitors, parents and contractors to site restricting access
- restrictions on BCEO staff allowed access to schools to comply with COVID requirements
- new guidelines provided to school staff and guidance counsellors in relation to engaging with students and managing disclosures and student protection matters
- vulnerable students invited to attend schools onsite even if not children of 'essential workers'

- schools required to develop COVID 19 – school critical incident plan including standing up of school based critical incident teams and the development of specific scenario planning and risk management
- international and interstate travel were deemed high risk and were required to cease
- excursions and camps (if allowed) are required to have site specific and school specific COVID 19 plans
- Learning Services developed significant online resources including communications required for parents, teachers and staff
- School Technical Support Protocols
- Student Device and Internet Resource Consent Form and Conditions of Use Statement
- Mobile Attendance and Welfare Application to access student details, attendance and contacts remotely
- Online Software Due Diligence Process redistributed
- Parent SMS – facilitates notification to parents if a student has an unexplained absence.

## **PART 2 - CAPABILITY**

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

#### **Recruitment and selection**

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

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

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

- Recruitment, Selection and Appointment of Teachers procedure;
- Recruitment, Selection and Appointment of Brisbane Catholic Education Office Staff;
- Recruitment, Selection and Appointment of Middle Leaders;
- Recruitment, Selection and Appointment of Primary Learning Leaders;
- Recruitment, Selection and Appointment of Specialist positions – Guidance Counsellors, Speech Pathologists
- Recruitment, Selection and Appointment (Acting Senior Leadership Positions in Schools);
- Recruitment, Selection and Appointment of P – 12 Heads;
- Recruitment, Selection and Appointment of DPs, APs and APREs;
- Recruitment, Selection and Appointment of Principals.

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

BCE adheres to the requirements of the *Working with Children (Risk Management and Screening) Act 2000*, *Working with Children (Risk Management and Screening) Regulation 2020*, *Education*

*(Accreditation of Non-State Schools) Act and Regulation 2017, and the Education (Queensland College of Teachers) Act 2005* when engaging employees.

All non-teaching employees working in BCE schools are required to comply with BCE Working with Children Check (Blue Card Screening) Procedure. BCE requires all 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*, to obtain a Working with Children Card (Positive Notice blue card) prior to applying for and commencing work and keep it current. All teachers must produce evidence of current teacher registration with the Queensland College of Teachers (QCT) before they commence work in BCE schools.

## **Training and Management of Employees**

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

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

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

This training provides BCE employees who work with students with skills to effectively respond to and report suspicions or allegations, 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 upskill them in receiving and managing disclosures from students and supporting others in the school community to protect students.

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

Mandatory Privacy training is undertaken by all employees annually as part of a suite of core compliance courses.

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

BCE provides the Employee Assistance Program to 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.

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 Planning and Performance Framework guide individual performance and development processes at all levels throughout the organisation. The Leadership Capability Framework articulates the requirements for BCE leaders to model and promote a culture where student protection is the responsibility of everyone.

### **Other BCE Support for Student Wellbeing**

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

Example policies and processes and initiatives include:

- Student Wellbeing policy
- Student Diversity and Inclusion policy
- School Uniform policy
- Pastoral Care and Student Wellbeing Position and statements
- Students in out-of-home-care (OHCC)
- Natural Disasters
- Critical Incidents
- Catholic Perspectives Across the Curriculum
- Preventing and Responding to Student Bullying and Harassment policy and procedure
- Alcohol and other Drug related incidents procedure
- Exclusion procedure
- Detention procedure
- Suspension procedure
- Negotiated Change of School procedure
- Physical Interventions procedure
- Police Interventions in Schools procedure
- Weapons in Schools procedure
- Manual Handling of Students procedure
- Suicide Intervention Prevention and Postvention
- Managing Non-suicidal self-injury in students procedure
- Students with Disability
- Student Attendance policy and procedure
- Management of Actual or Perceived Aggression (MAPA)
- Positive Behaviour for Learning (PB4L)
- Social Media policy
- Student Behaviour Support policy and procedures and the template for the School Behaviour Support plan
- Guidelines for informed consent for guidance counsellors
- GC Management of Confidential Information procedure
- Engage Strategy including attendance, family engagement, equitable outcomes, positive behaviour for learning, mental health and wellbeing and engaged learners
- Transitions – career development P-12
- Youth Support Coordinator Initiative (YSCI)
- Students with disability processes, guidelines and resources
- Guidelines and support plan for students who are gender diverse.

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.

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

## **PART 3 - CONCERNS**

### **Policies and procedures for handling disclosures or suspicions of harm**

*(mandatory requirement 4)*

#### **Student Protection Processes**

BCE's [Student Protection Processes](#) provide a process for all employees who work in BCE schools to recognise, respond and report allegations or suspicions of:

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

The Student Protection Processes have been developed in accordance with the requirements of the *Education (Accreditation of Non-State Schools) Act and Regulation 2017*, the *Education (General Provisions) Act 2006 and Regulation 2017*, the *Working with Children (Risk Management and Screening) Act 2000 and Working with Children (Risk Management and Screening) Regulation 2020*, the *Child Protection Act 1999* and the *Education (Queensland College of Teachers) Act 2005*. The *Student Protection Processes and Guidelines Catholic Education Archdiocese of Brisbane* document is reviewed and republished in keeping with the QCEC 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.

The Student Protection Processes are also underpinned by the Brisbane Catholic Education *Student Protection Policy (2020)*. The Student Protection Processes satisfy relevant requirements under the *National Catholic Safeguarding Standards*. In 2021 the review of the Student Protection Processes included the addition of relevant information regarding failure to protect and failure to report provisions of the *Criminal Code Act 1899*. A dedicated training module as well as updates to the annual student protection training module were implemented.

Mandatory reports are to be made to the Queensland Police Service in relation to allegations or reasonable suspicions of sexual abuse/likely sexual abuse of a student. Mandatory reports are made to the Department of Children, Youth Justice and Multicultural Affairs for harm/risk of harm to a student caused by sexual abuse, physical abuse, emotional abuse or neglect where a parent is not able and willing to act protectively. Reports under the *Criminal Code Act 1899* which are not required under mandatory reporting 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. If a report is made in relation to inappropriate behaviour of a staff member towards a student, that report will be handled by the Principal, with support from BCE's Professional Standards and Student Protection Team.

BCE has implemented a Student Protection Training policy and procedure. All school-based employees must complete mandatory on-line training on BCE's Student Protection Processes, annually, and BCE requires Principals at BCE schools to ensure all employees are student protection training compliant. Daily exception reporting assists Principals to fulfil this obligation.



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

BCE has developed a Student Protection Case Management System (SPCMS) 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 SPCMS also facilitates reporting student protection matters to the relevant state authority.

BCE has developed a complaints procedure to enable parents or students to make a complaint that a BCE school has not complied with the Student Protection Processes. Parents or students may make a complaint via the Record of Complaint about Non-Compliance with BCE's Student Protection Processes located on BCE's public website. 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.

BCE undertakes a system review for serious breaches of policy, including to identify any system improvement to policy, procedure or training and address any additional training requirements for individuals.

## **School Student Protection Contacts**

In accordance with the *Education (Accreditation of Non-State Schools) Regulation 2017* each BCE school must have two stated staff members to whom a student can report behaviour of another staff member that the student considers is inappropriate.

All BCE schools must nominate the Principal and at least one other staff member as a Student Protection Contact within the school. The role of the Student Protection Contact is to receive complaints and allegations from staff and students and to make or assist staff to make all reports as outlined in BCE's Student Protection Processes. BCE requires all BCE schools to make employees, students, volunteers and parents aware of the identity of the school's Student Protection Contacts, by publishing their details on the school's website, and for example, in school newsletters, on posters in the school and at parent information nights.

BCE recommends in larger schools that Principals consider nominating additional Student Protection Contacts. Information about the Student Protection Contacts and requirements for their appointment is detailed within the Student Protection Processes. Student Protection Contacts are required to undertake additional mandatory training to upskill them in receiving and managing disclosures from students. SPC training includes induction training (following appointment as a SPC), refresher training (every 2 years) and advanced skills training (every 4 years).

## **Student Protection Officers**

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

Student Protection Officers assist school-based employees in assessing sexual abuse and likely sexual abuse and harm caused or at a risk of being caused to students by sexual abuse, physical abuse, emotional abuse or neglect. They also offer support and guidance to schools during and

after a student protection intervention, assist with compliance with the Student Protection Processes and develop and facilitate professional learning for employees.

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

BCE takes any breach of its *Child and Youth Risk Management Strategy* seriously. BCE has a Student, Parent and Guardian Complaints Management policy and procedure. Breaches of any aspect of the Strategy may be dealt with as follows:

- if the alleged breach relates to the actions of an employee, BCE will manage this, as appropriate, in accordance with the BCE Staff Complaints Management procedure, the BCE Staff Misconduct procedure or Unsatisfactory Performance procedure;
- if the alleged breach relates to a report of inappropriate behaviour of a staff member towards a student, BCE will manage this in accordance with the Level 1 or Level 2 Intervention process set out in the Student Protection Processes;
- if the breach relates to a complaint made via the Record of Complaint about Non-Compliance with BCE's Student Protection Processes, that complaint will be dealt with in accordance with the Procedure for Handling Complaints about Non-Compliance with BCE's Student Protection Processes;
- if the breach relates to the actions of a volunteer or other personnel, it will be dealt with similarly to the procedures set out in the Student Protection Processes or complaints procedures, as appropriate; and
- if the breach relates to the action of a contractor, BCE will take appropriate action under BCE's contract with the contractor.

The actions or inactions which will constitute a breach of individual elements of the Strategy are detailed in the Code of Conduct and the Student Protection Processes. Details regarding management of any breach, including who manages the breach, are contained in the procedures mentioned above. All records are kept confidentially in BCE business information systems.

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

### **Risk Management Tools**

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

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

Schools consider the following in developing a high-risk strategy/plan.

- Establish 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

- identifying the specific risks and identifying the control measures that are already in place and whether additional controls are required.
- Address the following issues, if relevant:
  - 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
  - Accommodation and supervision requirements.

In addition, it is important where possible, that a risk management plan for high-risk events is communicated to all relevant stakeholders and they are provided with an opportunity to provide feedback in relation to the proposed risk mitigation strategies.

The Health and Safety Team at BCE provides support to BCE schools to build their capacity to carry out risk assessments and develop and implement effective risk management plans. In addition, a dedicated Workplace Health and Safety Officer (“WHSO”) is employed at every BCE school (who is required to complete a Certificate 4 in Workplace Health and Safety within 12 months of commencing the role). The WHSO’s role is to support the Principal in carrying out the health and safety responsibilities under legislation. The WHSO may assist schools with risk assessments and planning. BCE provides training, coaching and updates to the WHSO.

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

### **Risk Management for Excursions and Fetes**

Principals are responsible for approving all excursions. BCE has an Excursion and incursion safety procedure, and a Guideline for planning and excursion/incursion, –an Excursion and incursion Risk Management to assist Principals in identifying, assessing and managing risks associated with excursions. Principals are required by BCE to complete the Risk Assessment Template Form prior to each excursion. This form specifies that in carrying out a risk assessment, student protection risks must be assessed and managed.

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

BCE has developed and implemented a Fete and event safety procedure with associated checklists including a Fete Safety Planning to assist the Principal in managing the health and safety risks of conducting a fete and the Principal must sign off on the Fete Checklist prior to a fete taking place. BCE provides Principals with links to relevant information to assist in the risk assessment and management process on BCE’s intranet, including the Fireworks Checklist, Mobile Amusement Device Checklist, Contractors Workplace Health and Safety Agreement and information on the hygienic handling of food. A Contractor Agreement – School Fete has been implemented 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 Working with Children Card (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.

## Other Strategies to Minimise Risks of Harm

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

- **Supervision** - BCE schools must manage the supervision of students appropriately to ensure that there is adequate supervision of students. BCE requires BCE schools to develop processes based on BCE's information on supervision of students.
  - **Emergency** - BCE schools must ensure that employees are briefed to appropriately handle emergency situations and critical incidents in accordance with BCE's Procedures for Emergency Management and Responding to Critical Incidents.
  - **Fire/Lockdown** - BCE schools must ensure that all employees and volunteers are made aware of fire evacuation and lockdown procedures at the school and that practice drills occur each term.
  - **Visitors/Outsiders** - BCE schools must manage visitors to school premises to ensure the safety of employees, students and visitors, including relevant signage and directions together with procedures for signing in and out of the school. School processes must align with BCE information on visitors to school premises.
  - **Media/Communications strategies** – BCE schools must obtain the permission of parents (media consent) for the use of student photographs and names in any materials issued to the public in printed or electronic form as part of the enrolment process and annually thereafter. Identifying information of students is used in promotional material only with the specific permission of the parents and the students concerned. Specific informed consent must be obtained by BCE schools for any publication of names and photos in media outside the local school.
  - **Computer/Internet** - All employees and students are required to observe the Acceptable Use policy. BCE requires that in BCE schools, resources such as the Acceptable Use of Computer and Internet Resource Consent Form are implemented. BCE expects school employees to adhere to BCE's Social Media policy.
  - **Guidance Counselling Service** – BCE's Guidance Counsellors must obtain Informed Consent from a parent and/or student for participation in any guidance counselling services offered.
- Transport of students** - BCE requires that employees obtain the prior approval of the principal and the written permission of the parents. Principal approval will necessitate risk management involving, for example, an assessment of driver capability, confirmation of current driver's licence, insurance, road worthiness of vehicle, distance involved, any conflict with formal supervisory role for the teacher, gender mix and number of people travelling etc. This list is not exhaustive just indicative. Depending upon the proposed journey there may be other contextual factors to take into account. Transport in emergency circumstances may be acceptable, however, an attempt should be made to obtain the verbal consent of the principal and/or parent.
- **Transport of students by students** - BCE requires BCE schools with secondary students to develop a policy regarding student motor vehicle drivers and passengers in accordance with BCE's information on student drivers.
  - **Bathroom and toilet use** – BCE schools will detail guidelines for bathroom and toilet use based on the local school context. These guidelines should ensure the privacy of students

is maintained while allowing for appropriate supervision, e.g. announcing entry to the room and avoiding being alone with a child in these locations.

- **Managing injuries, allergies and illness** – BCE provides a range of procedures, guidelines, forms and resources to assist schools to effectively manage injuries, allergies and illness. All documents are available on the BCE Intranet, Spire. Examples include:
  - Medication to Students Procedure
  - The Five Rights of Medication Administration
  - Anaphylaxis Guidelines for School Staff
  - Letter for Parents and Carers template
  - Authorisation to Contact Medical Practitioner
  - Medication Administration Request Form
  - Individual Health Care Plan
  - Student Medication Register Template
  - Anaphylaxis Guidelines for School Staff
  - Diabetes Emergency Response Guidelines
  - Epilepsy Emergency Response Guidelines
  - Asthma Emergency Response Guidelines
  - Authority for Administering Paracetamol
  - Queensland Health Authority Authorisation to Obtain Possess and Administer an Adrenaline Auto Injector
  - Action Plan for Anaphylaxis
  - First aid procedure
  - First aid risk assessment
  - First aid kit inspection checklist
  - Designated First Aider Notice
  - Managing Head Injuries
  - Incident management and investigation Procedure
  - Incident and Injury Reporting Flowchart
  - Incident Investigation guideline
  - Incident and Injury Investigation Report
  - Incident System Access Request Form
  - WSS Incident and Injury Reporting Form
  - Notifiable Incidents Poster
  - Manual Handling of Students Procedure
  - Resources for Anaphylaxis, Asthma and Diabetes can be found in the References section of Student Medications Related Links, in Spire.
- **Confidential management of student information** - Employees are required to handle private and confidential information in relation to students and parents/guardians in accordance with the BCE Privacy Policy and BCE Code of Conduct.
- **Online safety training** is implemented in BCE schools for students studying Industrial Design Technology and Hospitality. This safety training assists teachers to ensure students receive consistent safety training for the use of high-risk equipment in these curriculum areas.

## **PART 4 - CONSISTENCY**

**Policies and procedures for compliance with Chapter 7 and 8 of the *Working with Children (Risk Management and Screening) Act 2000* (mandatory requirement 6)**

## **Working with Children Card (Positive Notice blue card) Requirements and Employee Register**

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 to comply with the requirements of the Procedure. BlueCard information and school registers are checked in the Term 2 "Health Check", a process involving site visits to ensure schools are meeting compliance requirements.

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 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.

BCE records Working with Children Card (Positive Notice blue card) information for all paid employees.

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.

All persons employed as teachers by BCE must be registered with the QCT. Principals are required to confirm current registration.

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. 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.

### **Procedures for reviewing the Child and Youth Risk Management Strategy**

To ensure that BCE's Child and Youth Risk Management Strategy remains current and effective, this strategy is subject to review annually or more regularly as required. In the event that BCE identifies concerns, particularly following an incident, BCE's Child and Youth Risk Management Strategy will be reviewed.

The review is documented and involves a range of stakeholders. Issues considered in the review may include:

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

Following the review, BCE schools, employees, parents and volunteers are advised of any changes to BCE’s policies and procedures as a result of the review or at the time of review and where appropriate, training is provided.

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

### **Accessibility and Training on BCE’s Child and Youth Risk Management Strategy**

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

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

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