Lourdes Hill College

Child Protection Policies Summary

Child Safety Program

Statement of Commitment to Child Safety & Wellbeing

Purpose

Our Statement of Commitment to Child Safety & Wellbeing was written to demonstrate the strong commitment of the College to child protection and safety, and to provide an outline of the policies and practices that we have developed to keep our students safe, including from abuse or other harm.

It is an overarching policy that provides the key elements of our approach to the College as a child safe organisation and sets the tone for the College's entire Child Protection Program.

The Statement of Commitment to Child Safety & Wellbeing provides the framework for:

- the development of work systems, practices, policies and procedures that promote child protection, safety and wellbeing within the College
- the creation of a safe and supportive College environment and a positive and robust child safe culture
- the promotion and open discussion of child safety issues within the College
- compliance with all laws, regulations and standards relevant to child protection in Queensland.

Scope

This Statement of Commitment to Child Safety & Wellbeing applies to all adults in the College community, including staff, Volunteers, Contractors, External Education Providers, parents/carers and other family members. This Policy applies in all College environments, both physical and online, and on-site and off-site College grounds (e.g. camps and excursions).

Statement of Commitment to Child Safety and Wellbeing

Lourdes Hill College is committed to providing education and care to children and young people to assist them to develop into high achieving, supported students, positively connected to each other and to the communities in which they live and which they will serve.

All children and young people who come to **Lourdes Hill College** have a right to feel and be safe. We are committed to the safety and wellbeing of all children and young people.

We have a zero tolerance for child abuse and other harm and are committed to acting in students' best interests and keeping them safe from harm.

The College regards its child protection responsibilities with the utmost importance and is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations and maintaining a child safe culture.

Each member of the College Community has a responsibility to understand the important and specific role they play individually, and collectively, to ensure that the wellbeing and safety of all students is at the forefront of all that they do, and every decision they make.

National Principles for Child Safe Organisations

The College's commitment to child safety is based on the National Principles for Child Safe Organisations that have been published by the Australian Human Rights Commission following a recommendation from the Royal Commission into Institutional Responses to Child Sexual Abuse.

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.
7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the National Child Safe Principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

Children and Young People's Rights to Safety, Information and Participation

Lourdes Hill College is a child safe and child-centred organisation. Our environment is friendly and welcoming to all children and young people.

We actively seek to include students in decisions that affect them. This includes decisions about organisational planning, delivery of services, management of facilities, and classroom learning and assessment environments.

We ensure students know about their rights to safety, information and participation. We recognise the importance of friendships and support from peers. We actively seek to understand what makes students feel safe in our organisation and regularly communicate with students about what they can do if they feel unsafe.

Parents/Carers, Families and Community Involvement at the College

The College recognises that parents and carers have the primary responsibility for the upbringing and development of their children. We ensure they participate in decisions affecting their children.

We ensure families and relevant communities know about the College's operations and policies, including its Statement of Commitment to Child Safety & Wellbeing and Child Protection Codes of Conduct, record keeping practices, risk management, and complaints and investigation processes.

We actively seek to include families and relevant communities in decisions about organisational planning, delivery of services, management of facilities, and classroom learning and assessment environments.

We build cultural safety at the College through partnerships with relevant communities.

Valuing Diversity in the College Community

Our College values diversity and does not tolerate any discriminatory practices. To achieve this, we:

•   support the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students and their families

•   support the cultural safety, participation and empowerment of students from culturally and/or linguistically diverse backgrounds and their families

- support the cultural safety, participation and empowerment of LGBTIQ students and their families

- welcome students with a disability and their families and act to promote their participation

- seek to recruit a workforce that reflects a diversity of cultures, abilities and identities

- ensure all staff, Direct Contact Volunteers and Direct Contact Contractors have appropriate cultural awareness, diversity and inclusion practices training

- have a physical environment that actively celebrates diverse cultures and recognises cultural difference

- commit to ensuring our facilities promote the inclusion of students of all abilities.

Our Child Protection Program

Lourdes Hill College is committed to the effective implementation of our Child Protection Program and ensuring that it is appropriately reviewed and updated. We adopt a risk management approach by identifying key risk indicators and assessing child safety risks based on a range of factors including the nature of our College's activities, physical and online environments and the characteristics of the student body.

Our Child Protection Program relates to all aspects of child safety and protecting students from abuse or other harm, and establishes work systems, practices, policies and procedures to create and maintain a child safe environment and culture at the College. It includes:

- Child Protection Codes of Conduct
- clear information as to what constitutes child abuse and other harm and associated key indicators of abuse or other harm
- clear procedures for reporting child safety incidents or concerns internally, and for responding to allegations of child abuse or other harm
- strategies to support, encourage and enable staff, Volunteers, Contractors, parents/carers and students to understand, identify, discuss and report child safety matters
- procedures for recruiting and screening Board members, the Executive Team, staff, Volunteers and Contractors
- procedures for reporting to external agencies, including Mandatory Reporting, and Reporting to Police
- pastoral care strategies designed to empower students and keep them safe

- strategies to support and encourage the participation and inclusion of all students including Aboriginal and Torres Strait Islander students, students from culturally and/or linguistically diverse backgrounds and students with disability
- child protection training
- information regarding the steps to take after a disclosure of abuse or other harm to protect, support and assist students
- guidelines with respect to record keeping and confidentiality
- policies to ensure compliance with all relevant laws, regulations and standards (including the Blue Card Child and Youth Risk Management Strategy and National Principles for Child Safe Organisations requirements)
- a system for continuous review and improvement.

As a part of Lourdes Hill College's induction process, all staff and Direct Contact Volunteers are required to complete induction in our child protection policies, practices and procedures, and also receive annual refresher and ongoing child protection training.

Staff, Direct Contact and Regular Volunteers, and Direct Contact and Regular Contractors are supported and supervised during their engagement by the College to ensure that they are compliant with the College's approach to child safety.

Reporting Child Safety Incidents or Concerns to the College

Our Child Protection Program provides detailed guidance for Board members, staff, Volunteers and Contractors on how to identify key indicators of child abuse and other harm and how to report child safety incidents or concerns internally to one of our College's Child Protection Contact Officers. It also contains detailed procedures with respect to the reporting of child abuse incidents to relevant external authorities.

Students at the College are provided with information about and encouraged to use multiple pathways to raise child safety incidents or concerns about or at the College. These include informal and formal ways, an 'anonymous' way, and through external child advocacy or child safety organisations. Formally, as required by the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld), our Child Protection Contact Officers are nominated as the staff members to whom students can report concerns about the conduct of another staff member that the student considers is inappropriate.

Parents/carers, family members and other community members who have child safety concerns or who suspect that a child or young person associated with the College may be subject to abuse or

other harm can contact the College's Senior Child Protection Contact Officer the College's Principal by phoning (07)33998888 or emailing principal@lhc.qld.edu.au. A receipt of acknowledgement for having received the information will be provided.

Any person can also contact the Principal or Deputy Principal if they have concerns regarding the College's leadership in relation to child safety.

Communications will be treated confidentially on a 'need to know basis'.

Whenever there are concerns that a child is in immediate danger the Police should be called on 000.

The College's Response to Child Safety Incidents or Concerns

The College will take appropriate, prompt action in response to all child safety incidents or concerns, including allegations, complaints or disclosures of child abuse or other harm, breaches of our Child Protection Codes of Conduct and inappropriate behaviour by Staff, Volunteers, Contractors, students, parents/carers, Visitors and other members of the College community. The College's response will include:

- all matters that meet the required relevant thresholds being reported externally to Child Safety Services, the Police or the Queensland College of Teachers, depending on the issues raised
- the College fully cooperating with any resulting investigation by an external agency
- protecting any student connected to the child safety incident or concern until it is resolved and providing ongoing support to those affected
- securing and retaining records of the child safety incident or concern and the College's response to it.

For information about the College's legal obligations to respond to and report child abuse and other harm, refer to the College's Procedures for Responding to and Reporting Harm, or Allegations of Harm (to Students Under 18 Years).

Responsibilities for Child Protection at the College

Child protection is everyone's responsibility. All adults in the College Community have a shared responsibility for contributing to the safety and protection of students. Specific responsibilities include:

The College's Child Protection Contact Officers

Our Child Protection Contact Officers are a point of contact for raising child safety concerns within the College. They are also responsible for championing child safety within the College and assisting in coordinating responses to child safety incidents.

The Senior Child Protection Contact Officer has additional child protection responsibilities, such as being a first point of contact for all child safety concerns or queries for the wider community, and coordinating the College's response to child safety incidents in consultation with the Executive Team and the Board.

The Board

The Board is responsible for approving our Child Protection Program and ensuring that the College has appropriate resources to effectively implement our Child Protection Program.

The Principal

The Principal is responsible, and will be accountable for, the operational management of the College, and the Child Protection Program. The Principal is responsible for taking all practical measures to ensure that this Statement of Commitment to Child Safety & Wellbeing and the College's Child Protection Program is implemented effectively and that a strong and sustainable child safe culture is maintained within the College.

The Executive Team

Each member of the Executive Team is required to ensure that appropriate resources are made available in their area of operations to allow the College's Child Protection Program to be effectively implemented within the College, and to support the Principal in the practical application of the College's child protection strategies, policies, procedures and work systems.

Staff

All staff are required to comply with our Statement of Commitment to Child Safety & Wellbeing and Child Protection Codes of Conduct, be familiar with our Child Protection Program and understand their legal obligations with respect to the reporting of child abuse and other harm, and Blue Cards.

It is each individual's responsibility to be aware of key indicators of abuse and other harm, to be observant, and to raise all child safety incidents and concerns with one of the College's Child Protection Contact Officers.

Volunteers

All Volunteers at the College are responsible for contributing to the safety and protection of students in the College environment.

All Direct Contact and Regular Volunteers are required to comply with our Statement of Commitment to Child Safety & Wellbeing and Child Protection Codes of Conduct and understand their legal obligations with respect to the reporting of child abuse and other harm.

It is each Direct Contact and Regular Volunteer's responsibility to be aware of key indicators of child abuse and other harm, to be observant, and to raise all child safety concerns with one of the College's Child Protection Contact Officers.

Contractors

All Contractors engaged by the College are responsible for contributing to the safety and protection of students in the College environment.

All Direct Contact and Regular Contractors engaged by the College are required to comply with our Statement of Commitment to Child Safety & Wellbeing and Child Protection Codes of Conduct and understand their legal obligations with respect to the reporting of child abuse and other harm. The College may include this requirement in the written agreement between it and the Contractor.

Direct Contact and Regular Contractors include, for example, maintenance and building personnel, consultants, casual teachers, tutors, sports coaches and College cleaners. This also includes music teachers and other extra-curricular teachers and instructors who are engaged by students and their families directly, rather than the College, but have an agreement with the College to use the College's facilities.

External Education Providers

An External Education Provider is any organisation that the College has arranged to deliver a specified course of study that is part of the curriculum, to a student or students enrolled at the College. The delivery of such a course may take place on College premises or elsewhere.

All External Education Providers engaged by the College are responsible for contributing to the safety and protection of students in all College environments. All External Education Providers engaged by the College are required by the College to comply with our Statement of Commitment to Child Safety & Wellbeing and Child Protection Codes of Conduct.

Lourdes Hill College may include this requirement in the written agreement between it and the External Education Provider.

Child Safe Human Resources Management

Lourdes Hill College applies best practice standards in the recruitment and screening of staff and Direct Contact Volunteers. Our recruitment procedures comply with the College's Child Protection Human Resources Management and ensure that all reasonable steps are taken to engage the most suitable and appropriate people to work with children and young people. All prospective staff, Direct Contact Volunteers and Direct Contact Contractors are required to maintain a valid Blue Card.

The College ensures that the College's Executive Team, staff and Direct Contact Volunteers and Direct Contact Contractors undergo child protection induction, and ongoing education and training as part of our commitment to safeguarding children and young people from harm.

Staff, Direct Contact Volunteers and Direct Contact Contractors are subject to regular supervision and performance monitoring whilst engaging with students.

The College ensures that professional development programs for staff include child protection education and training programs.

Child Safe Risk Management

The College recognises the importance of a risk management approach to minimising the potential for child abuse or harm to occur and we use this information to inform our policies, procedures and activity planning.

Record Keeping

The College has a Child Protection Record Keeping Policy and is committed to best practice record keeping. In accordance with our policy, and as required by our Procedures for Responding to and Reporting Child Safety Incidents or Concerns, all internal and external reports of child safety incidents and concerns, as well as any other responses by the College are recorded.

In maintaining records of child safety incidents or concerns, the College maintains confidentiality and privacy for students and families in accordance with federal and state privacy legislation.

Policy and Program Review

Lourdes Hill College is committed to the continuous improvement of our Child Protection Program. The Program is regularly reviewed for overall effectiveness and to ensure compliance with all child protection related laws, regulations and standards.

The College is committed to actively seeking, actioning, and incorporating into this Policy, feedback from students, families, the wider College community, staff, Volunteers and Contractors, and will communicate any adjustments or amendments widely throughout the College community.

Non-Compliance with Our Statement of Commitment to Child Safety & Wellbeing

Lourdes Hill College enforces this Statement of Commitment to Child Safety & Wellbeing and our Child Protection Codes of Conduct. In the event of any non-compliance, we will instigate a review that may result in a range of measures including (depending on the severity of the breach):

- remedial education
- counselling
- increased supervision
- the restriction of duties
- suspension or
- in the case of serious breaches, termination of employment, contract or engagement.

Relevant Legislation and Other Policies

- [Child Protection Act 1999 (Qld)](https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-010)
- Child Protection Regulation 2023 (Qld)
- Education (General Provisions) Act 2006 (Qld)
- Education (General Provisions) Regulation 2017 (Qld)
- Education (Accreditation of Non-State Schools) Act 2017 (Qld)
- Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)
- Working with Children (Risk Management and Screening) Act 2000 (Qld)
- Working with Children (Risk Management and Screening) Regulation 2020 (Qld)

Child Safety Program

Child Safety Code of Conduct

Scope

The Child Safe Adult Code of Conduct applies to:
- the Principal and the College Executive Team
- all staff members, including non-teaching staff and temporary or casual staff
- all Volunteers
- all Contractors
- External Education Providers
- teaching students on placement at the College
- Visitors (including parents/carers and other adult family members of students).

Together referred to as "the College Community" for the purposes of this Code.

The Child Safe Adult Code of Conduct applies in all College environments. College environments include both physical and online environments, as well as any environment (including those outside the College's grounds) where College-related activities are occurring.

Code of Conduct

Each adult member of the College community is responsible for promoting the safety and wellbeing of students by adhering to the following standards of behaviour:

DO:

- Uphold Lourdes Hill College's Statement of Commitment to Child Safety and Wellbeing at all times.
- Comply with applicable guidelines published by the College, including our <u>Staff and Student Professional Boundaries Policy</u> and <u>Child Safe Behavioural Guidelines for Specific</u>

<u>Circumstances</u>.

- Behave as a positive role model to students.
- Promote the protection, safety and wellbeing of students.
- Be vigilant and proactive with regard to student safety and child protection issues.
- Provide age-appropriate supervision for students.
- Treat all students with respect.
- Promote the safety, participation and empowerment of students with disability.
- Promote the cultural safety, participation and empowerment of linguistically and/or culturally diverse students and Aboriginal and Torres Strait Islander students.
- Use positive and affirming language towards students.
- Encourage students to 'have a say' and then listen to them with respect.
- Respect cultural, religious and political differences.
- Help provide an open, safe and supportive environment for all students to interact and socialise.
- Intervene when students are engaging in bullying or inappropriate behaviour towards others, for example humiliating or vilifying others.
- Ensure as far as practicable that adults are not left alone with a child.
- Report any breaches of this Child Safety Code of Conduct.
- Report concerns about child safety to one of the College's Child Protection Contact Officers and ensure that your legal obligations to report child abuse or other harm externally are met.
- Where an allegation of child abuse or other harm is made, ensure as quickly as possible that the student involved is safe.
- Call the Police on 000 if you have immediate concerns for a student's safety.
- Respect the privacy of students and their families and only disclose information to people who have a need to know.

DO NOT:

- Engage in any form of inappropriate behaviour towards students or expose students to such behaviour.

- Engage in prejudicial or oppressive behaviour or use inappropriate language with students.
- Express personal views on cultures, race or sexuality in the presence of students that could discriminate against any student based on culture, race, ethnicity or disability.
- Engage in open discussions of an adult nature in the presence of students.
- Engage in any form of sexual conduct with a student including making sexually suggestive comments and sharing sexually suggestive material.

- Engage in inappropriate or unnecessary physical conduct or behaviours including doing things of a personal nature that a student can do for themselves, such as toileting or changing clothes.
- Engage in any form of physical violence towards a student including inappropriately rough physical play.
- Use physical means or corporal punishment to discipline or control a student.
- Engage in any form of behaviour that has the potential to cause a student serious emotional or psychological harm.
- Develop 'special relationships' with students that could be seen as favouritism (for example the offering of gifts or special treatment to specific students).
- Engage in undisclosed private meetings with a student who is not your own child.
- Engage in inappropriate personal communications with a student through any medium, including online.
- Engage in activities with a student who is not your own child, outside of school hours and without permission from the student's parent/carer.
- Engage in inappropriate personal communications with a student through any medium, including any online contact or interactions with a student.
- Take or publish (including online) photos, movies or recordings of a student without parental/carer consent.
- Post online any information about a student that may identify them such as their: full name; age; e-mail address; telephone number; residence; school; or details of a club or group they may attend.
- Ignore or disregard any suspected or disclosed child abuse or other harm.

Report Any Concerns

It is the College's policy that any breach of the Child Safety Code of Conduct is a child safety incident. All staff, Direct Contact and Regular Volunteers, and Direct Contact and Regular Contractors who witness, or suspect, any breach of this Code of Conduct must report their concern internally and, if required, also externally.

Students are provided with information about and encouraged to use multiple pathways to raise child safety incidents or concerns about or at the College, including breaches of the Child Safety Code of Conduct. These include informal and formal ways, an 'anonymous' way, and external child advocacy or child safety organisations.

Parents/carers, family members or other community members who witness or suspect that there has been a breach of this Code of Conduct, or have concerns that a child or young person associated with the College may be subject to abuse or harm from a member of staff, a Volunteer or a Contractor, should contact:

- the College's Senior Child Protection Contact Officer the College's Principal, by phoning (07)33998888 or emailing principal@lhc.qld.edu.au. A receipt of acknowledgement for having received the information will be provided, or
- if the concern relates to the Principal, contact the Chair of the Board.

Communications will be treated confidentially on a 'need to know basis'.

Whenever there are concerns that a child or young person is in immediate danger, the Police should be contacted on 000.

Responding to Breaches of the Child Safety Code of Conduct

Our Procedures for Responding to and Reporting Child Safety Incidents and Concerns include:
- information for Staff, including stated staff members to whom a student may report inappropriate behaviour by another staff member, and relevant Volunteers and Contractors about how to identify key indicators of child abuse and other harm, including how to identify inappropriate behaviour by other staff members
- a requirement to report all child safety incidents or concerns, including inappropriate behaviour by staff members, internally
- setting out how to report child safety incidents or concerns, including inappropriate behaviour by other staff members, to relevant external authorities
- detailed procedures setting out the College's response to child safety incidents or concerns that occur at or involve the College or its Staff, Volunteers and Contractors
- a Child Protection Program Breach Management Plan, which sets out possible consequences for breaching the Child Safety Code of Conduct.

Consequences for Breaching the Child Safety Code of Conduct

Staff, including the Executive Team and Principal, Volunteers and Contractors who breach this Code of Conduct may be subject to disciplinary actions that could include (depending on the severity of the breach):
- remedial education

- counselling
- increased supervision
- the restriction of duties
- appointment to an alternate role
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

Where any other member of the College community breaches any obligation, duty or responsibility within our Child Safety Code of Conduct, **Lourdes Hill College** will take appropriate action.

For more information, refer to our Child Protection Program Breach Management Plan.

Implementation

The College reviews the Child Safety Code of Conduct annually. The Board has endorsed this Child Safe Adult Code of Conduct.

Our Child Safety Code of Conduct is published on our public website.

Our Child Protection Program also includes a staff and Student Professional Boundaries Policy that provides detailed guidance for all staff, Volunteers, Contractors and External Education Providers on how to maintain professional boundaries between students and adults at **Lourdes Hill College**.

Child Safety Program

Staff and Student Professional Boundaries

This Policy applies to all staff, including the Principal and the College Executive Team, the Board of Directors, teaching and non-teaching staff, Volunteers, Contractors and External Education Providers (together, known as "Staff" for the purposes of this policy only).

Staff hold a unique position of influence, authority, trust and power in relation to students at the College. As such, it is their duty at all times to maintain professional boundaries with students.

The following policy and guidelines are designed to raise awareness of situations where professional boundary violations may occur and some strategies to minimise the risk of boundary violations. The practice of protective behaviours at all times will also reduce the possibility of vexatious claims being brought against Staff.

Lourdes Hill College's Policy

Lourdes Hill College is committed to providing a safe physical, virtual and emotional environment where all of our students are respected and treated with dignity in an appropriate, professional and caring manner so that the risk of child abuse is minimised, and a safe and supportive child safe environment is maintained.

It is our policy that:

- Staff exercise their responsibilities in a way that recognises professional boundaries with regard to their relationships with students at all times
- Staff identify, discourage and reject any advances of a sexual nature made by a student
- Staff interaction with students is professional at all times, both inside and outside of school hours
- conflict of interest issues must be reported to the Principal as soon as practicable

- equal learning opportunities are given to each student without discrimination
- appropriate consequences will be applied to Staff who breach professional boundaries.

What are professional boundaries?

Professional boundaries are parameters that describe the limits of a relationship in circumstances where one person (a student) entrusts their welfare and safety to another person (a Staff member), in circumstances where a power imbalance exists.

The fact that College Staff are in a unique position of trust, care, authority and influence with students means that there is always an inherent power imbalance between them. It also means that professional boundaries must be established, maintained and respected at all times.

In most cases this power imbalance is clear, however sometimes it may be more difficult to recognise especially for younger staff members who may only be a few years older than their students.

The following guidelines are not exhaustive, and given that sometimes 'grey areas' may occur, it is expected that all staff (no matter their age or experience) use their own good judgment, think very carefully about the implications and potential consequences of engaging in certain behaviours with students, and always err on the side of caution.

When unsure about whether professional boundaries are being, or have been, breached, ask yourself:

- Would I modify my behaviour if a colleague was present?
- How would I feel about explaining my actions at a staff meeting?
- Am I sharing information for the student's benefit, or for my benefit?
- Am I dealing with this student differently from others in similar circumstances?
- Is my language or demeanour different from normal when dealing with this particular student?

Intimate Relationships

Staff must not initiate or develop a relationship with any student that has, or can be interpreted as having, a romantic or sexual, rather than professional, basis. It is not relevant that the relationship may be consensual or condoned by parents/carers.

Such relationships have a negative impact on the teaching and learning of students and colleagues and may carry a serious reputational risk for the Staff member and, in turn, the College.

The professional relationship of Staff and students may be breached by:

- flirtatious behaviour or dating
- development of an intimate personal relationship
- sexual relations
- the use of sexual innuendo, inappropriate language, or the sharing of inappropriate material with students
- unwarranted and inappropriate touching
- unwarranted and inappropriate filming or photography
- deliberate exposure to sexual behaviour of others (e.g. pornography)
- having intimate contact without a valid context via written or electronic means (e.g. email, letters, telephone, text messages, social media sites or chatrooms)
- going out, whether alone or in company, to social events such as the movies or dinner
- exchanging gifts of a personal nature.

Staff should also be aware that developing or encouraging romantic or sexual relationships with recent former students (over 18 years of age) may violate professional boundaries and are therefore strongly discouraged from doing so.

The imbalance of power and authority that exists in the staff/student relationship does not suddenly disappear after the student finishes their schooling. Staff should not assume that they will be protected from disciplinary action by claiming that a relationship began only after the student left the College as there may be a reasonable belief the emotional intimacy of the relationship developed while the staff/student relationship existed.

Personal Relationships

Staff must not initiate or develop a relationship with any student that has, or can be interpreted as having, a personal rather than professional basis. This is regardless of whether the relationship is consensual, non-consensual or condoned by parents or carers.

It is the student's perception of staff behaviour and not the intention of the staff member that is important.

An established and expected professional relationship between Staff and students may be compromised by Staff:

- attending parties or socialising with students outside of organised College events (without parental/carer permission)
- sharing personal details about their private lives with students
- meeting with students outside of school hours without permission from the College.

Staff must recognise at all times that their role is not to be a "friend" or "parent" to a student.

Fair Learning Opportunities

The main focus of teaching is effective student learning and, as such, teachers are expected to support their students with their professional expertise so as to offer them the best education in their individual circumstances. The quality of teaching and learning between teachers and students characterises their relationship.

Teachers should demonstrate their commitment to student learning by:

- maintaining a safe and challenging learning environment that promotes mutual respect
- recognising and developing each student's abilities, skills and talents by catering to their individual abilities and respecting their individual differences
- encouraging students to develop and reflect on their own values
- interacting with students without bias
- not engaging in preferential treatment
- not discriminating against any student on the basis of race, sex, sexuality, disability or religious or political conviction
- always making decisions in students' best interests.

Electronic Communications between Staff and Students

It is expected that all staff at the College will adhere to the following guidelines:

- all use of technology should be for educational purposes or for the organisation of co-curricular activities
- all email communication between Staff and students should be via the College email system and reflect a professional staff/student relationship
- Staff should not communicate with students via text message where it is not in a professional context

- Staff should not give out their personal telephone numbers or social media contact details
- Staff are not to accept or request students as 'friends' on social media or otherwise use social media to communicate in any way that is not condoned or approved by the College
- Staff should not exchange personal pictures with a student
- teachers are not expected or encouraged to respond to concerns of parents/carers or students on holidays, weekends or in the evening
- any student personal contact numbers or other personal contact details made available to the College should only be used for College communications.

Physical Contact with Students

All staff should be aware that situations may arise that can be perceived in a manner that was not intended. For this reason, all staff at the College should adhere to the following guidelines for contact with students both in and outside of College grounds:

- Staff should avoid unnecessary physical contact with students
- minimal, non-lingering, non-gratuitous physical contact may be acceptable in the context of the situation (e.g. congratulatory pat on the back or handshake)
- contact for sport, drama and dance instruction is acceptable in a class situation but not in a 1:1 situation. If physical contact is required for specific technical instructions, it must be brief and only with the consent of the student. Note that a student may withdraw consent for this contact either verbally or gesturally and Staff must remain vigilant whilst engaging in necessary contact situations. Once consent has been withdrawn no further contact can be or should be made.

Off-Campus Excursions and Camps

During off-campus excursions or camps, the same physical contact guidelines apply as well as the following:

- checking of sleeping arrangements, or supervising of students changing should be done, where possible, with another staff member present and always in a manner that respects students' privacy and personal space
- always knock and advise of presence prior to entering a bedroom or dormitory
- ensure that while in a bedroom or dormitory a strict staff/student relationship is upheld and that Staff do not engage in inappropriate behaviour, such as sitting on a student's bed.

Managing Conflicts of Interest

Where personal relationships with students such as family relationships and close friendship networks exist, questions of conflicts of interest may arise.

This may be more prevalent in close or rural communities where professional boundaries may be tested due to the nature and size of the community. In these circumstances, Staff need to be far more diligent in developing and maintaining these boundaries.

Where a staff member feels that a conflict of interest may exist, they should notify the Principal, or the Chair of the Board if the conflict involves the Principal, and arrangements should be implemented to avoid the conflict situation if possible. For example, the teaching of students by a staff member with a conflict should be avoided.

Any significant decisions relating to these students in the College (such as the appointment to classes and selection in sports teams) should be referred to another staff member and endorsed by a supervisor.

Disclosure of Staff/Student Interactions

It is Lourdes Hill College's policy that all staff are encouraged to declare any interactions with students outside school hours. These interactions may include instances where the staff member is:

- related to the student
- friends with the student's parents/carers or family
- given parental/carer consent to interact with the student for academic purposes outside of school hours, and the parent/carer has notified the College.

Declarations by Staff about a relationship with students and their families outside of the College context or about interactions that occur with the consent of the parent/carer must be verified by the parent/carer of the student.

Lourdes Hill College maintains records of all declarations made by staff members related to their interactions with students, or relationships with students, that exist outside of school hours or College premises. These records are to be made available to the parents/carers of a student upon request.

These records are kept in accordance with our Child Protection Record Keeping and Human Resources Management policies.

Staff Responsibilities

All staff must:

- follow the guidelines as set out in this Policy
- immediately report any conflicts of interest
- remove themselves from decision making where a conflict has been identified.

Implementation

These guidelines are implemented through a combination of:

- staff training and development in professional conduct
- student and parent/carer education and information
- effective management of teachers engaging in inappropriate relationships with students
- effective management of conflicts of interest
- effective communication and incident notification procedures
- effective record keeping procedures
- initiation of corrective actions where necessary

Report Any Concerns

It is the College's policy that any breach of this Professional Boundaries Policy is a child safety incident.

All staff, Direct Contact and Regular Volunteers, and Direct Contact and Regular Contractors who witness, or suspect, any breach of professional boundaries must report their concern internally and, if required, also externally.

Students are provided with information about, and encouraged to use, multiple pathways to raise child safety concerns about or at the College, including breaches of the Staff and Student Professional Boundaries. These include informal and formal ways, an 'anonymous' way, and external child advocacy or child safety organisations. For more information, refer to Child Protection Complaints Management.

Parents/carers, family members or other community members who witness or suspect that there has been a breach of professional boundaries, or have concerns that a child or young person associated with the College may be subject to abuse or harm from a member of Staff, a Volunteer or a Contractor, should contact the College's Senior Child Protection Contact Officer the College's Principal, by phoning (07)33998888 or emailing principal@lhc.qld.edu.au. A receipt of

acknowledgement for having received the information will be provided. If the concern relates to the Principal, please email the Board Chair at boardchair@lhc.qld.edu.au.

Communications will be treated confidentially on a 'need to know basis'.

Whenever there are concerns that a child or young person is in immediate danger, the Police should be contacted on 000.

Responding to Breaches of Staff and Student Professional Boundaries

Our [Procedures for Responding to and Reporting Child Safety Incidents and Concerns](https://ce-viewer.com/module/227/page/8c424d75-79ff-49e9-9b1c-a5d34ecfcde3.md) include:
- information for Staff, including stated staff members to whom a student may report inappropriate behaviour by another staff member, and relevant Volunteers and Contractors about how to identify key indicators of child abuse or other harm, including how to identify inappropriate behaviour by other staff members
- a requirement to report all child safety incidents or concerns, including inappropriate behaviour by staff members, internally
- procedures setting out how to report child safety incidents or concerns, including inappropriate behaviour by other staff members, to relevant external authorities
- detailed procedures setting out the College's response to child safety incidents or concerns that occur at or involve the College or its Staff, Volunteers and Contractors
- a Child Protection Program Breach Management Plan, which sets out possible consequences for breaching Staff and Student Professional Boundaries.

Consequences for Breaching the Staff and Student Professional Boundaries Policy

Where a staff member breaches this Policy **Lourdes Hill College** may take disciplinary action that may include (depending on the severity of the breach):
- remedial education
- counselling
- increased supervision
- the restriction of duties
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

Whenever there are concerns that a child or young person is in immediate danger, the Police should be contacted on 000.

Child Safety Program

Child Protection Behavioural Guidelines for Specific Circumstances

The Child and Youth Risk Management Strategy Toolkit outlines a number of specific issues that, if relevant to the College, require the development of specific policies or guidelines that outline the College's expected standards of behaviour with respect to these issues.

Our Child Safety Code of Conduct and Staff and Student Professional Boundaries policy cover many of these issues. However, the College considers that the following issues are relevant to the College, and as such require more in-depth and specific policies and guidelines. The following matrix sets out the relevant policies and guidelines that establish the expected standards of behaviour in these specific circumstances:

Behavioural Issue	Guidelines / Policy
Supervision of Children	General Supervision Policy
Behaviour Management	Student Code of Conduct Bullying Prevention and Intervention Harassment Policy
Transport of Children and Young People	Driveway and Car Park Safety Driving Safety Policy
Managing Injuries or Illnesses	Medication Administration

	First Aid Policy Accident Management Policy
Visitors to the College	Visitor Management Policy
Photographs of Students	Privacy Policy Cyber Safety Policy
Use of Technology and Social Media	Information and Communication Technology Policy Cyber Safety Policy
Smoking, Alcohol Consumption and the Use of Medication and Drugs	Student Use of Alcohol Student Use of Illicit Drugs
General Safety	Student Duty of Care
Confidentiality of Information	Child Protection Record Keeping Confidentiality and Privacy

Child Safety Program

Child Protection Risk Management

Lourdes Hill College has a broad range of risks associated with its activities and operations, including risks relating to child safety. Effectively managing child safety risks is a vital element in ensuring that our College is keeping children and young people safe.

The Working with Children (Risk Management and Screening) Regulation 2020 (Qld) sets out eight matters to be included in the College's Child and Youth Risk Management Strategy. These include that the College must have:

- plans for managing the risks associated with high-risk activities and special events
- strategies for providing communication and support for implementing the risk management strategy including written information about the risk management strategy for, and where the strategy may be accessed by:
  - persons employed or otherwise engaged by the College for the risk management strategy; and
  - children, or parents of children, who receive a service or take part in an activity associated with the College.

While child safety risks within the operations of a school can never be completely eliminated, **Lourdes Hill College** actively implements risk management practices to ensure that child safety risks are reduced.

The Child Protection Risk Management policy outlines our approach to managing these risks.

Key Definitions

In addition to definitions set out in [Child Protection Program Definitions](https://ce-viewer.com/module/227/page/45f5b3d2-e628-465b-8ac3-8b297c374481.md), the following

definitions are of particular importance to this Policy:

Risk

The term "risk" means, in simple terms, the possibility of something bad happening.

Risk Management

"Risk management" is the general process of identifying and assessing risks, followed by the application of resources to minimise, monitor, and control the probability and/or the impact of these risks.

Responsibilities for Child Protection Risk Management

Identifying and managing child protection risks is everyone's responsibility. All adults in the College community have a shared responsibility for contributing to the safety and protection of students through identifying and managing these risks.

In addition to relevant roles and responsibilities as set out in Child Protection Responsibilities, the following people have particular responsibilities under this section of the Child Protection Program.

The Board of Directors

The Board is responsible for:
- understanding the child safety risks relevant to the College, based on the College's operational profile
- developing, and ensuring the effective implementation of the College's child safety risk management strategies (noting that the Board has assigned responsibility for implementing the strategies to the Principal)
- reviewing and approving any changes to the College's child protection risk management strategies
- promoting a child protection risk management culture within the College
- establishing clear lines of responsibility and delegation with regard to child safety management
- ensuring that the College communicates its commitment to child safety and to child protection legal and regulatory compliance, and ensuring that operations are consistent with the commitment to child safety
- ensuring that the College identifies and takes steps to mitigate child safety risks, including by:

- ensuring that the College has a child safety risk register in which child safety risks and risk controls are recorded
- receiving regular reports regarding child protection risk management at the College and the College's child protection risk register
- monitoring and evaluating the effectiveness of the College's child protection risk controls
- reviewing risk ratings for child protection risks, risk movement, new and emerging child protection risks and the proposed controls for these risks
- receiving regular reports regarding child protection legal and regulatory compliance at the College
- ensuring that appropriate guidance and training is provided to the individual members of the Board, Staff and relevant Volunteers and Contractors, at least annually, about child protection issues, including legal reporting obligations (noting that the Board has assigned responsibility for ensuring that Staff, Volunteers and Contractors receive this guidance and training to the Principal).

The Principal

The Principal is responsible for the effective day-to-day management of risk and for:
- effectively implementing the College's child protection risk management strategies, and effectively deploying all available resources for that purpose
- communicating openly and honestly with, and providing advice to, the Board in relation to:
  - child protection risk management at the College
  - any instances of non-compliance with child protection legal and regulatory requirements
  - any breakdown in child protection risk controls, systems or processes
  - identifying child protection risks (including new and emerging risks) relevant to the College and the steps taken (or that should be taken) to mitigate these risks
  - the resources required for the College to meet its legal and regulatory compliance requirements, effectively manage child protection risks and be a child safe organisation
- promoting a child protection risk management culture within the College
- ensuring that the College's child protection risk register is maintained, regularly reviewed, reported to the Board and updated as set out in **Child Protection Risk Management Procedures** below
- monitoring and evaluating the effectiveness of the College's child protection risk controls
- ensuring that the College's current programs and activities and any new programs and activities are assessed to ensure that any child protection risks associated with them are effectively managed and communicated to Staff

- ensuring that appropriate guidance and training is provided to all Staff, and relevant Volunteers and Contractors, at least annually, about child protection issues, including legal reporting obligations.

The Executive Team

The Executive Team is responsible for:
- reviewing, in consultation with the Principal, the College's child protection risk management strategies, the child protection risk register and the Child Protection Program in accordance with the policies and procedures set out below
- identifying and reporting to the Principal any instances of non-compliance with child protection legal and regulatory requirements and any breakdowns in child protection risk controls
- ensuring that appropriate resources are made available in their area of operations to allow the College's child protection risk management strategies to be effectively implemented within the College
- supporting the Principal in the practical application of the College's child protection risk management strategies, policies, procedures and work systems
- promoting a child protection risk management culture within the College.

Development of Child Safety Risk Management Strategies

The child safety risk management strategies below have been developed, and implemented, based on:
- the nature of all College environments (physical, online and off-campus)
- the operational profile of the College
- the activities students undertake at the College (including the provision of services by Contractors or outside the College's physical environment)
- the characteristics and needs of all of our students, including age, gender mix, Aboriginal and Torres Strait Islander students, students from culturally and linguistically diverse backgrounds, and students with disability.

In particular, the following factors have been taken into account:

- All Girls College
- School-age students

Lourdes Hill College's Risk Management Strategies

Lourdes Hill College has implemented the following Child Protection risk mitigation strategies to ensure that the College maintains a proactive approach to our duty of care to protect students from harm and complies with our legal and regulatory obligations:

Child Protection Risk Management:

- **Risk Assessments**: The College conducts a risk assessment of its environments and activities, taking into account the characteristics and the needs of students and applicable control measures (such as systems, policies and procedures), at least annually to ensure that all child safety risks are identified and that there aren't gaps in our child protection strategies and systems that a person motivated to harm or abuse students could exploit.
- **Child Safety Risk Register**: The College identifies and records all reasonably foreseeable risks of child abuse and other harm in all College environments, as well as all other risks relevant to child safety, in a Child Safety Risk Register, and assesses these risks with regard to the likelihood of the risk event occurring and the potential consequences if it was to occur. This Risk Register can be found with the Principal..
- **Child Safety Risk Register Annual Reviews**: The Child Safety Risk Register is reviewed annually by the Board and at least annually by the Executive Team. This review includes:
    - reviewing the effectiveness of child safety risk control measures and evaluating the overall risk rating for all child safety risks
    - analysing child safety incidents that may indicate a breakdown in risks controls
    - analysing any instances of non-compliance with child protection legal and regulatory requirements and the systems and procedures that should be put in place to avoid any further non-compliance
    - considering the need to implement risk treatments to further control risks.
- **Child Protection Program**: The College has developed and implemented this Child Protection Program, which includes a comprehensive suite of child protection policies and procedures. These policies and procedures include, in particular:
    - child protection standards, set out in our <u>Statement of Commitment to Child Safety & Wellbeing</u>
    - policies, procedures and guidance, set out in <u>Responding to and Reporting Child Safety Incidents or Concerns</u>, on identifying risks of child abuse and other harm in the College environment, legal obligations, responsibilities for managing these risks, and how to report and how to respond to child safety incidents and concerns
    - a set of policies and procedures for managing <u>Child Safety Incidents or Concerns Involving College Staff, Volunteers and Contractors</u> to ensure that all risks specific to Staff, Volunteer and Contractor conduct are identified and controls are put in place

- a <u>Working with Children Checks</u> policy
- a set of policies and procedures for <u>Child Protection Human Resources Management</u>.

- **Child Protection Training**: <u>Child Protection Training</u> is provided at induction, and at annual refresher child protection training for individual members of the Board, the Executive Team, all Staff, and relevant Volunteers and Contractors.
- **Child Protection Contact Officers:** The College has appointed a number of <u>Child Protection Contact Officers</u> who are "child protection Champions" at the College.
- **Approvals for High Risk Activities and Special Events**: The College has an approvals process and/or ongoing risk management process for certain College contexts and activities (set out in the Child Protection Risk Management Procedures below), which require that a specific risk assessment be undertaken and provided either to the Principal or a relevant management committee for their consideration.
- **Reporting about Child Protection Risk Management**: The Board and the Executive Team receive regular reports regarding child protection risk management and any instances of non-compliance with our policies and with legal and regulatory requirements, as well as any other information or incidents that may suggest a breakdown in child protection systems, procedures and risk controls.
- **Continuous Improvement**: The College and the Board are committed to a continuous improvement process which involves regular review of the Child Protection Program and Child Protection risks to identify areas for improvement.

Child Protection Risk Appetite

The College has no appetite for any increase to any risk rating for child protection risks.

As a result, the College regards any non-compliance with legal and regulatory requirements related to child safety and child protection as unacceptable and requiring immediate rectification.

The College has no appetite for implementing any new programs or initiatives that:

- may increase the College's child protection risks
- may result in a breakdown of the College's existing child protection risk controls and their effectiveness.

Child Protection Risk Management Procedures

Identifying and Internal Reporting of Child Protection Risks

The Executive Team and the Board consider, as part of their annual reviews of the Child Protection Risk Register, all currently identified child protection risks, whether these reflect all of the College's current child protection risks and whether there are any additional child protection risks that should be added to the Child Protection Risk Register.

In addition, child protection risks at the College may be identified during reviews of the Child Protection Program as a whole, which:

- consider whether a consistent child protection issue is being regularly raised in complaints and/or other feedback from the College community
- require systemic reviews and/or a root cause analyses of child safety incidents or concerns that occur at or involve the College.

For more information, refer to Regular Reviews and Continuous Improvement.

All staff members must be aware of the College's child protection risk management practices and must report to the Principal or a Child Protection Contact Officer:

- any incidents, issues or concerns that may indicate a breakdown in our child protection risk controls
- any new or perceived child protection risks.

Contact details for our Child Protection Contact Officers are here.

Risk Assessment, Risk Evaluation and Risk Treatment

Assessment of risk includes consideration of the effectiveness of risk controls (our current policies, procedures, systems and work practices), the likelihood of the risk happening and the consequence if the risk was to occur. Risks are then evaluated and matched to a risk matrix to determine the risk rating. The risk rating defines the level of governance oversight required and whether any additional measures ("risk treatments") are required to reduce or remove the risk.

For more information on the College's risk methodology, please contact the Principal.

Risk Assessments for High-Risk Activities and Special Events

The Executive Team, and any staff members who have or who have been delegated the required level of responsibility, must ensure that child protection risks are considered and reviewed when there are

changes to the College's operational profile or when new activities, buildings and facilities are planned and operating.

The following high-risk activities and special events require, as part of their approvals or ongoing risk management processes, that specific risk assessments be undertaken and provided either to the Principal or a relevant management committee for their consideration:

- **Physical Environment**: Ongoing, periodic reviews must be undertaken of all physical College environments to eliminate physical isolation risks, such as solid classroom doors or rooms with no windows, and of any procedural controls where elimination is not possible, including random checks of obstructed or out-of-the-way locations.
- **Online Environment**: Regular monitoring, and ongoing periodic reviews must be undertaken of the online College environment and electronic communications, to identify and eliminate online child safety risks such as access controls, inappropriate sharing of information/data security, online grooming, and breaches of the Child Protection Codes of Conduct and Social Media – Personal Usage Policy.
- **Excursions and Camps:** The College has developed and implements specific policies and procedures relating to excursions and camps ensuring that child safety risks specific to excursions and overnight stays are identified and controls are put in place. For more information, refer to our Excursions policies.
- **Sport and Extra Curricular Activities**: The College has developed and implements specific policies and procedures to manage child protection risks specific to the variety of sporting and extra-curricular activities at the College. These risks include the use of Casual Staff and Volunteers, maintaining professional boundaries, appropriate demonstration techniques and supervision both on College grounds and in off-site locations. For more information, refer to our Sports Code of Conduct.

A rigorous risk assessment process must occur for all of the above activities before they are approved by the College to go ahead. This includes a documented process of:

- communicating and consulting with relevant stakeholders to understand the scope of the activity or event
- describing the activity or event in detail, including the purpose, objectives, key elements, location, environmental factors and persons involved
- identifying risks of harm or abuse to students
- analysing and classifying the risk in terms of both the likelihood and consequences of the risk event occurring

- evaluating the risks to make decisions about how to treat or control them
- putting the determined risk treatments and controls into action
- managing the risks by monitoring and reviewing the risk treatments and controls on an ongoing basis.

CompliSpace Assurance

The College has implemented CompliSpace Assurance as one strategy to manage the Child Protection risks in all College environments.

CompliSpace Assurance is an online risk and compliance workflow management tool that integrates with our Child Protection Program to provide a system of risk management, compliance and continuous improvement based on international standards.

Through this system, key risks and compliance obligations are captured, documented and converted into plain-English questions that are assigned via email to responsible individuals for action. Each individual is provided with a calendar view of their compliance performance via an online browser. Unactioned tasks are escalated and reported to allow the College to monitor and record its compliance performance in real-time.

The College also uses this risk management system as a method of evaluating and reviewing the ongoing effectiveness of the implementation of its risk measures and controls.

The College's Child Protection Risk Register

Our commitment to keeping children and young people safe cannot be achieved without effectively managing Child Protection risks. As a result, the College has developed a Child Protection Risk Register. This is to ensure that the Board and the Executive Team have clear visibility and oversight of Child Protection risks in the College, and enable the College to effectively manage our legal and regulatory Child Protection obligations.

The Executive Team and the Board review, at least annually, the Child Protection risks that are included in the Child Protection Risk Register and the effectiveness of risk controls for each Child Protection risk. Where new Child Protection risks are identified, these are discussed and added to the Child Protection Risk Register and risk controls for the new risks are identified and implemented.

Our Child Protection Risk Register can be found with the Principal..

Communicating our Child Protection Risk Management Strategies

The Child Protection Risk Management policy is published on the College's public website.

The College makes it available to all Staff via the College's PolicyConnect site, and provides it to new Staff and to relevant Volunteers and Contractors as part of their induction. Training about the Child Protection Risk Management policy is also included in annual refresher training for Staff and relevant Volunteers and Contractors. For more information, refer to Child Protection Training.

The Child Protection Risk Management policy is also communicated to Staff, Volunteers, Contractors, parents/carers, students and the wider College community in summary in the Statement of Commitment to Child Safety & Wellbeing, which is available on our public website.

It is also available in hard copy by request.

Lourdes Hill College

Procedures for Managing Child Safety Incidents or Concerns At or Involving Lourdes Hill College or its Staff, Volunteers or Contractors

For the purposes of this policy, we use the terms "staff" and "staff member" to include all teaching and non-teaching staff, Board members, volunteers, contractors and external providers.

Introduction

Complaints involving:

- breaches of the Child Safe Codes of Conduct

- conduct that has caused, or has the potential to cause, harm to current or former students

by

- current or former staff members

- current or former students and

- other people on Lourdes Hill College premises or at Lourdes Hill College events

are managed in a different way to other complaints received by the Lourdes Hill College. These kinds of complaints are instead managed using the same procedures that we use for managing incidents of or internal reports raised about this kind of behaviour.

This is because these kinds of incidents, complaints, allegations or concerns are all of a similar sensitive nature and raise potential privacy and confidentiality issues.

Child Safety Incidents or Concerns

We call **any** behaviour, that may be:
- a breach of our Child Safe Codes of Conduct or
- child abuse, grooming or other harm of a student
a "child safety incident or concern".

It does not matter whether the behaviour is by a staff member, another student, a parent/carer or any other person on Lourdes Hill College premises or at Lourdes Hill College events.

Breaches of the Child Safe Codes of Conduct

Lourdes Hill College requires all staff members, parents/carers, visitors and other adults in the Lourdes Hill College community to comply with our **Child Safe Adult Code of Conduct**.

Staff members must also comply with our **Staff and Student Professional Boundaries** policy.

Students must comply with our **Student Code of Conduct**.

Any breach of these Child Safe Codes of Conduct is considered a child safety incident.

Lourdes Hill College

Child Abuse, Grooming or Other Harm of a Student

Our child protection policies set out the different definitions and key indicators of child abuse, grooming and other harm of students. The following is covered by these definitions and indicators:
- sexual abuse/exploitation
- grooming and online grooming
- physical abuse
- psychological or emotional abuse
- neglect.

In addition to family members, other adults associated with a student can subject the student to these behaviours, including staff members, other students and other people associated with the College.

Reportable Conduct

Where a child safety incident or concern involves or is alleged to involve behaviour by a staff member, we call this "reportable conduct."

Not all physical contact, verbal communication and other behaviour of staff members is reportable conduct. Reasonable or accidental conduct is **not** reportable conduct.

Some examples of conduct that is **not** reportable conduct include a staff member touching a child on the arm to get their attention, guide them or comfort them, a teacher raising their voice to attract attention or restore order in a classroom, or conduct that is established to be accidental.

Child Protection-Related Complaints

It is critical that the broader College community tells us about all child safety incidents or concerns that occur at or otherwise involve the College. This enables the College to ensure the safety and wellbeing of students and to comply with its legislative reporting obligations.
We call reports made to the College about child safety incidents or concerns at or involving the College or its staff members a child protection-related complaint."

How to Make a Child Protection-Related Complaint to the College

If you would like to make a complaint about:

- a breach of the Child Safe Codes of Conduct

- conduct that has caused, or has the potential to cause, harm to current or former students

by

- current or former staff members

- current or former students

- other people on College premises or at College events

you can do so by:
1. Sending an email to the Principal.
2. Writing a letter to the College addressed to Principal.
3. Telephoning the College and asking to speak to the Principal.

Lourdes Hill College

If the Principal is the subject of your complaint or allegation of misconduct or reportable conduct, please contact the Board Chair.

How College Will Respond to Child Protection-Related Incidents and Complaints

Immediate Actions

Depending on the nature of the incident, complaint, allegation or concern, after receiving the internal report or the child protection-related complaint, the College will – if required by law or by our child protection policies and procedures – report the matter to the Child Safety Services, the Police and/or other relevant external agencies.

The College will conduct an initial risk assessment in consultation – if an external report has been made – with the Police or Child Safety Services, to identify and mitigate any ongoing risks to student safety and wellbeing.

The College will also ensure that support is provided to any students, staff members and family members impacted by the incident, concern or complaint. In particular, we ensure that they are informed about advocacy and support services which may be available to assist them.

The Internal Investigation

The College will then conduct an internal investigation of the incident or complaint, led by the Principal or an external investigator.

However, if Child Safety Services or the Police are investigating the alleged conduct, that investigation takes precedence and the College's investigation will **only** proceed with their permission.

When conducting the internal investigation, the College follows the National Office of Child Safety's **Complaint Handling Guide: Upholding the Rights of Children and Young People.**

All internal investigations uphold the principles of procedural fairness and confidentiality – information is only shared with those who need to know.

Investigating and Managing Behaviour by a Student Against Another Student

Responding to this kind of child protection-related incident or complaint involves considering the College's duty of care both to any student who is a victim and to the student who is the alleged perpetrator, as well as to other students.

The Principal will follow our student discipline policies for these investigations.

Investigating and Managing Behaviour by Non-Staff Members on College Premises or at College Events

Where the child safety incident, or the child protection-related complaint, involves behaviour by a person who is neither a current or former College student nor a current or former staff member (for example they are a parent /carer or a visitor) whose behaviour occurs on College premises or at a College event, the College's investigation is generally limited.

It may involve only the risk assessment and a subsequent review of our systems, policies and procedures to ensure the future safety and wellbeing of our students.

Lourdes Hill College

Investigating and Managing Complaints about Reportable Conduct

Depending on the nature of the incident, complaint, allegation or concern about reportable conduct, the College may need to report the matter to additional external agencies, such as the Queensland College of Teachers or Blue Card Services.

The steps that will be followed for reportable conduct investigations include:
- planning the investigation (including planning the involvement of the child)
- information gathering
- staff member response
- ensuring support during the investigation
- making findings and determining outcomes/actions
- taking action.

In addition, further risk assessments are conducted during the internal investigation and at the end of that investigation.

Record Keeping About Investigations

Records are kept at each step of the investigation process including:
- records received or created during investigations (such as notes of interviews and documents received)
- records of findings
- records of actions proposed and taken.

These are kept in a safe and secure location.

Reviews of Investigation Procedures and Outcomes Internal

Reviews

Staff members, students and parents/carers of students who are involved in the matter and who are not satisfied with an internal investigation or its outcome may request an internal review of:
- the procedures undertaken
- findings made
- disciplinary actions proposed or taken and/or
- other outcomes (including a decision not to make a finding or to take disciplinary or other action).

Requests for internal reviews should be made to the Principal prinicpal@lhc.qld.edu.au or Board Chair boardchair@lhc.qld.edu.au

External Reviews for Overseas Students

If an overseas student is not satisfied with the outcome of College's internal investigation, they may lodge an external appeal through the Overseas Students Ombudsman (OSO) which investigates complaints about problems that overseas students or intending overseas students may have with private education and training in Australia. The services of the OSO are free. The contact details for the OSO are as follows:

- Email: ombudsman@ombudsman.gov.au

- Call: 1300 362 072 within Australia. Outside Australia call +61 2 6276 0111.

Lourdes Hill College

- Enquiries: 9:00am to 5:00pm Monday to Friday, Australian Eastern Standard Time (Australian Eastern Daylight Time when daylight savings is in effect)

- Postal: Commonwealth Ombudsman, GPO Box 442 Canberra ACT 2601.

- Website: https://www.ombudsman.gov.au/How-we-can-help/overseas-students

Lourdes Hill College agrees to be bound to the OSO's recommendations and will ensure that any recommendations made are implemented within 30 days of receipts of the report.

Disclosing Information to the College Community

The College will consult with any relevant external agencies (such as Child Safety Services or Police) to determine when, what and by whom information can be shared.

Sharing Information with Parents/Carers and Students

The parent/carer of a student who is an alleged victim of a child protection-related complaint, or any child safety incident or concern occurring at or involving the College, has a legitimate interest in being told that their child is an alleged victim and of the nature of the incident, complaint or allegation.

The parent/carer and student also has a legitimate interest in being informed of the process, progress and findings of any investigation, and of any action that might be taken after the investigation is completed.

However, special issues may arise that require an adjustment to normal information sharing practices. Legal impediments may impact the timeliness of disclosing information, the type or amount of information that is disclosed and to whom the information is disclosed, particularly in the case of reportable conduct allegations.

Sharing information with the wider College community

The College takes great care to assess the relevance and appropriateness of sharing information about a child safety incident or concern, or a child protection-related complaint, before providing any information about it to the wider College community. This is because even the confirmation of an incident or allegation can lead to the identification of a victim.

Information that may identify the victim of the incident, concern or complaint will not be shared with the wider College community without the consent of the victim and/or their parent/carer.

Where to Find More Information

For more information about our policies and procedures relating to the College's management of child safety incidents or concern occurring at or involving the College or its staff members, child protection- related complaints, or complaints handling generally, please contact the Principal.

Student Protection Reporting Form

For reporting an allegation of sexual abuse, suspected sexual abuse or likely sexual abuse of a student by another person; a reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering significant harm and may not have a parent able and willing to protect the child from harm. Once completed, this form MUST be sent to the Queensland Police Service and/or the Department of Child Safety, Youth and Women Regional Intake Service as required.

This form meets reporting requirements under sections 366/366A of the *Education (General Provisions) Act 2006*, section 13E of the *Child Protection Act 1999, Child Protection Regulation 2023* and regulation 16 of the *Education (Accreditation of Non-State Schools) Regulation 2017.*

Date of Report

PART A: The following sections to be completed by the person making this report:
(include as much detail as possible based on the information known)

TYPE OF REPORT

Sexual Abuse ☐   Likely Sexual Abuse ☐

Significant Harm ☐   Unacceptable Risk of Significant Harm ☐

Details of the Person Making this Report (The "First" Person)

Name   Position/Role

School/Workplace   Address

Suburb   State   Postcode

Phone

STUDENT AND FAMILY DETAILS

Details of the Student Subject of this Report

Name   DOB   Age   Year Level

Gender

Residential Address

Suburb   State   Postcode

Phone

Does the Student have a Disability?   Yes ☐   No ☐

Type/Nature of Disability

Impact of Disability on Interview Process

Cultural Background: Aboriginal ☐   Torres Strait Islander ☐

Other - Please Specify

Does the Student Speak English? Yes ☐   No ☐

If No, Please Specify Language

Is an Interpreter Required?   Yes ☐   No ☐

Parent/Guardian Details

Parent 1:

Parent/Guardian Name   Relationship to Student

Address (if different from student)

Suburb   State   Postcode

Phone (Home)   (Work)   (Mobile)

Parent 2:

Parent/Guardian Name   Relationship to Student

Address (if different from student)

Suburb   State   Postcode

Phone (Home)   (Work)   (Mobile)

FURTHER DETAILS ABOUT THE HOUSEHOLD (if known)			
Name	**Age**	**Gender**	**Relationship to Student**

ALLEGATION DETAILS:

Allegation Made Against: (if more than one person is reported please attach on additional page)

Name   Age   Gender

Address

Suburb   State   Postcode

Phone

Relationship to Student Subject of this Report

Is the allegation against a staff member or volunteer?   Yes ☐   No ☐

Type of abuse (tick as many as apply)   Physical Abuse ☐   Neglect ☐

           Sexual Abuse ☐   Emotional/Psychological Abuse ☐

Type of Harm (tick as many as apply)   Physical Harm ☐   Emotional Harm ☐

           Psychological Harm ☐

Details of the basis for the first person becoming aware or reasonably suspecting that the student has been abused or harmed.

Date of allegation/disclosure/suspicion

How and where was the allegation/disclosure made or suspicion formed? E.g. disclosure, observation, information from another person.

What concerns have led you to form a reasonable suspicion of abuse or significant harm?
(include as much information as possible, including what happened, where did it happen, when did it happen, who was involved).

What have you noticed about the student's appearance and/or behaviour?

Does the student have a current physical injury or have they experienced a physical injury as a result of the incidents?

Yes ☐   No ☐   Unknown ☐

If yes, please provide details and describe the injury.

If yes to physical injury, did the student require   Yes ☐ No ☐   Unknown
medical treatment, or does the child require
medical treatment?

If yes, was/has medical treatment been provided   Yes ☐ No ☐ Unknown ☐
to the student?

If yes, provide details of what treatment has or is being provided:

Are there any immediate safety concerns   Yes ☐   No ☐   Unknown ☐
for the student?

If yes, provide details of the immediate safety concerns:

DETAILS OF PERSONS WHO MAY HAVE FURTHER INFORMATION AROUND ALLEGED ABUSE OR HARM: (if more than one person please attach on additional page)

Name   Age   Gender

Address

Suburb   State   Postcode

Phone

Relationship to Student Subject of this Report

Email Address (if known)

PART B: The following sections to be completed by the Principal/Director of the Governing Body

ADDITIONAL INFORMATION

Current or Previous Orders and Intervention

Family Court Order?   Yes ☐   No ☐   Unknown ☐

Details

Domestic Violence Order?   Yes ☐   No ☐   Unknown ☐

Details

Child Protection Order?   Yes ☐   No ☐   Unknown ☐

Details

Departmental Intervention?   Yes ☐   No ☐   Unknown ☐

Details

Previous Student Protection Reports?   Yes ☐   No ☐   Unknown ☐

Details

Referral to Support Service?   Yes ☐   No ☐   Unknown ☐

Details

Are there any risk factors which may be impacting negatively on the student or family?

For example: domestic violence, alcohol/substance misuse, disability, mental health instability, physical/intellectual disability

Yes ☐   No ☐   Unknown ☐

If yes, provide details:

Is the parent/caregiver aware of the concerns?

Yes ☐   No ☐   Unknown ☐

If yes, provide details:

What other services or supports are currently in place to support the student and their family (if known)?

Any other relevant information:

DETAILS OF THE PERSON making this report (the "First" person)

Name   Position/Role

School/Workplace

Address

Suburb   State   Postcode

Phone

Email Address

REPORT SENT TO:

Details

☐   Queensland Police Service – where the allegation is of
      sexual abuse or likely sexual abuse of a student

☐   Department of Child Safety, Youth and Woman
      Regional Intake Service - where the allegation is
      that a child has suffered, is suffering or is at unacceptable
      risk of suffering significant harm and may not have a
      parent able and willing to protect the child from harm

☐ Director of the Governing Body – where the
Principal is the first person in relation to an
allegation of sexual abuse or likely sexual abuse
of a student, OR where the allegation is against
the Principal

Date Report Submitted

Important Notice:

Once submitted to the Principal or Director of the Governing Body this form MUST be sent, as a matter of urgency, to the Queensland Police Service and/or the Department of Child Safety, Youth and Woman as required.