



Catholic Education
Diocese of Rockhampton

Child and Youth Risk Management Strategy

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Scope: This strategy applies to all in Catholic kindergartens, schools and colleges conducted by Catholic Education - Diocese of Rockhampton (referred to as CEDR in the document).

What is the Child and Youth Risk Management Strategy?

The *Working with Children (Risk Management and Screening) Act 2000* (the Act) and the *Working with Children (Risk Management and Screening) Regulation 2020* require regulated organisations to develop and implement a child and youth risk management strategy which demonstrates the organisation's aim and willingness to keep children and young people safe.

To comply with the legislative framework, a child and youth risk management strategy must include the eight mandatory requirements. The eight mandatory requirements meet all 10 of the National Principals for Child Safe Organisations.

What are the requirements of the Child and Youth Risk Management Strategy?

The requirements are categorised into components which:

- address an organisation's **commitment** to creating a safe and supportive service environment
- strengthen an organisation's **capability** to provide such an environment
- assist an organisation to manage any particular **concerns** with respect to the safety and wellbeing of children and young people who are involved with the organisation, and
- promote the **consistency** of an organisation's approach to risk management, both within the organisation and with respect to compliance with the requirements under the Act.

The **eight mandatory requirements** will be explored in the following order:

The organisation's commitment...

1. As demonstrated through their visible statement of commitment to the safety and wellbeing of children and the protection of children from harm, and
2. Relevant and specific codes of conduct for stakeholders who interact with children.

The organisation's capability...

3. As demonstrated through their written procedures for recruiting, selecting, training and managing staff and volunteers.

How an organisation manages concerns...

4. As shown in their policies and procedures for handling disclosures or suspicions of harm, including reporting guidelines
5. As evidenced in response plans for managing breaches of risk management strategies, and
6. The transparent risk management plans for high risk activities and special events.

How the organisation can maintain consistency...

7. Throughout all policies and procedures for managing compliance with the blue card system, and
8. The implemented and modelled strategies for communication and support.



In addition to the mandatory requirements, CEDR has implemented further elements to ensure the safety of students and staff within the school environment, including *Procedures for dealing with weapons in Catholic Schools* and *visibility requirements*.

What does the CEDR Child and Youth Risk Management Strategies look like?

CEDR schools meet these eight requirements through policies, procedures and practices across a number of key areas, including but not limited to:

- Our *Student Protection* policy
- Our *Student Protection Processes and Guidelines*
- Our *Code of Conduct*
- Our *Workplace Health and Safety* policy.

Requirements

The following identifies how the requirements of the *Child and Youth Risk Management Strategy* are met through our policies, procedures and practices, with due regard for the individual needs of each school:

1. A statement of commitment to the principles of safe and supportive service environments

CEDR is committed to the safety and wellbeing of all students.

Student protection and wellbeing are paramount in Catholic kindergartens, schools, colleges and OSHC centres. Our commitment to the protection of children is based on our belief that each person is made in the image of God, and our ethos is to provide a safe and supportive environment for all. All children have the right to expect that the school will always act to protect them from any kind of harm.

2. A Code of Conduct

CEDR has a [Staff Code of Conduct](#) for employees engaged on a temporary, casual, part-time, fixed term or continuing basis, and is continually reviewed. All CEDR employees must comply with the Code of Conduct which sets out the standard of behaviour required in the performance of their duties.

The Code of Conduct states that CEDR staff must always perform their duties professionally and in an appropriate manner and observe appropriate boundaries, behaviour and contact with students. The Code of Conduct also clearly articulates expectations of staff in relation to risk management and duty of care obligations to students, including but not limited to compliance with laws, standards and CEDR policies and procedures.

“[Right Relationships](#)” is CEDR’s Code of Conduct for parents, and where applicable, to volunteers and visitors to CEDR sites. Right Relationships is guided by the principles of:

- Dignity of the human person
- Preferential option for the poor
- Solidarity
- Confidentiality
- Reconciliation
- The Common Good
- Mutual Trust and Respect

The [CEDR Volunteers’ Code of Conduct](#) also details expectations of behaviours of volunteers, including that they must “Report any matter that would indicate harm or inappropriate behaviour to student to the Principal or Student Protection Contact (SPC)” (p. 2).

The *ICT Code of Practice – Staff* sets out expectations to all CEDR staff in their use of ICT resources and services, regardless of where or when those resources and services are accessed.

3. **Procedures for recruiting, selecting, training and managing staff and volunteers** **Recruitment, selection, training and management strategies that encourage best practice and enhance the safety and wellbeing of children and young people**

Recruitment processes within CEDR are detailed in the *Staff Recruitment Procedures and Leave Booklet* to ensure a comprehensive practice is adopted when employing staff.

All applicants are provided with clear advice that any offer is subject to successful blue card screening, referee checks and identification verification. Reference checks include specific student protection related questions, targeting suitability of the proposed applicant to work with children and identifying any behaviours of concern.

Employment Screening procedures include:

- I. Obtaining copies of mandatory accreditation documentation
- II. Referee Checks (specific student protection questions and suitability to work with children)
- III. Structured interviews
- IV. Signed declarations:
 - Acceptance of the *Statement of Principles*, the *Code of Conduct* and *ICT Code of Practice*
 - Acceptance of the *Employment Collection Notice*

Additionally

3.1 Restricted Persons

There are exemptions that allow people to engage in regulated child-related employment without a blue card in certain circumstances. Certain people are restricted from relying on these exemptions.

It is an offence for a restricted person to start or continue in restricted employment. It is also an offence for an employer to employ or continue to employ a restricted person to start or continue in restricted employment if they know (or should reasonably know) they are a restricted person.

A restricted person means a person who either:

- has been issued a negative notice
- has a suspended blue card
- is a disqualified person
- has been charged with a disqualifying offence which has not been finalised.

Restricted employment refers to the situations that allow a person to work with children without a blue card, such as if they are:

- a volunteer parent
- a volunteer who is under 18
- paid or unpaid staff who work in regulated child-related employment for not more than 7 days in a calendar year
- a person with disability who is employed at a place where the person also receives disability services or NDIS supports or services
- a secondary school student on work experience who carries out disability related work under the direct supervision of a person who holds a blue or exemption card.

3.2 Position Descriptions

All CEDR roles have a clear position description that details the skills and experience needed by staff to perform their duties and contribute to an environment which is safe and supportive for children and young people.

All position descriptions contain a Statement of Responsibility and a Student Protection Statement, which outlines expectations for staff in relation to our commitment to providing a safe and supportive environment for all students.

3.3 Teaching staff

All teachers employed by CEDR are registered with the Queensland College of Teachers. Original certificates of registration and qualifications are sighted upon employment and copies are stored in the school and in the teacher's personnel file at the Catholic Education Office. Principals are in-serviced with the process and procedures should there be concerns about staff conduct. The *Student Protection Processes and Guidelines* outlines the process by which the Queensland College of Teachers is advised of any investigations involving a registered teacher.

3.4 Non-Teaching Staff

All non-teaching staff have been issued with a Blue Card by Blue Card Services, in accordance with the [Working with Children \(Risk Management and Screening\) Act 2000 \(the Act\)](#), unless an exemption applies. The school is responsible for maintaining a current register of all non-teaching staff Blue Card details via the Blue Card online Portal, including number and renewal date. A copy is also held in each relevant

individual's personnel file. New non-teaching employees must hold a current Blue Card prior to the commencement of work.

3.5 Volunteers

The [Working with Children \(Risk Management and Screening\) Act 2000](#) specifies the rules relating to volunteers and Blue Card requirements. At all times, all CEDR sites are required to adhere to this legislation.

3.6 Induction

All new staff members are provided with an induction upon commencement of duties. For school staff, this process is undertaken through the guidance of the Principal (or delegate) and includes local information in the context of the school, using the *Teacher Induction Handbook*.

For Catholic Education Office staff, the *CEO Staff Induction Guidelines* are used for the induction of staff.

Specific Student Protection and Code of Conduct training is conducted with all staff, the completion of which is a requirement for all new staff, including relief teachers.

Volunteers and Visiting Service Providers are also required to complete an induction process as part of their orientation to the school.

4. Policies and procedures for handling disclosures and suspicions of harm

All schools and kindergartens are required to follow the [CEDR Student Protection Processes and Guidelines](#) to recognise, respond and report allegations or suspicions of:

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

The 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*, relevant information regarding failure to protect and failure to report provisions of the *Criminal Code Act 1899*, and the *Education (Queensland College of Teachers) Act 2005*.

The CEDR Student Protection Processes and Guidelines document is reviewed annually and are approved by the Non-State Schools Accreditation Board.

The CEDR Student Protection Processes are also underpinned by the [CEDR Student Protection Policy](#)



All staff receive regular training and professional development in relation to the *Student Protection Processes and Guidelines*, including in-services conducted by student protection staff from the Catholic Education Office.

CEDR has processes to enable all CEDR employees access to *RiskMan*, which enables them to complete an online form for 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. This system also facilitates submission of student protection reports to the relevant state authority.

CEDR has developed a complaints procedure to enable parents or students to make a complaint that CEDR has not complied with the Student Protection Processes. Parents or students may make a complaint via the Record of Complaint about Non-Compliance with CEDR's Student Protection Processes located on CEDR's public website. CEDR provides assistance to handle these complaints in accordance with CEDR's Procedure for Handling Complaints about Non-Compliance with CEDR's Student Protection Processes.

School Student Protection Contacts

In accordance with the *Education (Accreditation of Non-State Schools) Regulation 2017*, a minimum of two Student Protection Contacts (SPC) are nominated by each school as staff members to whom a student can report behaviour of another staff member that the student considers is inappropriate.

CEDR does not place any limits on to whom or the ways in which students can disclose student protection incidents or concerns. Students may therefore raise student safety incidents or concerns, including about inappropriate behaviour by staff, volunteers or contractors, via any means.

The Principal is the senior Student Protection Contact at each CEDR school. The other Student Protection Contacts are staff member at the school or kindergarten. 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 CEDR's Student Protection Processes.

The identity of the Student Protection Contacts is made known to employees, students, volunteers and parents 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.

Information about the Student Protection Contacts and requirements for their appointment is detailed within the CEDR Student Protection Processes.

All SPC receive additional mandatory training on an annual basis.

Student Protection Officers

CEDR has a Student Protection Team, including the Student Services Manager and Student Protection Officers who are hold experience and knowledge in the field of child protection. Student Protection Officers assist school-based employees in assessing sexual abuse and likely sexual abuse and harm caused or at risk of being caused to students by sexual abuse,



physical abuse, emotional abuse or neglect. They also offer support and guidance during and after a student protection intervention, assist with compliance with the Student Protection Processes and develop and facilitate professional learning for employees.

Volunteers are required to follow the processes outlined in the *Induction of Volunteers* document that is provided to all volunteers as part of their induction process.

Visiting Teachers and Specialists are required to follow the processes outlines in the *Agreement for Visiting Teachers / Specialists* which is again provided to all visiting service providers as part of the induction process.

5. **Policies and procedures for the occasions where there might be a breach of the organisation's child and youth risk management strategy**

For the purposes of this strategy, a breach is any action or inaction by a staff member within CEDR that fails to comply with any part of the *Child and Youth Risk Management Strategy*. Allegations of breaches of the *Child and Youth Management Strategy* are managed under the principles of procedural fairness and natural justice.

Any breach of the CEDR Child and Youth Risk Management Strategy will be taken very seriously. Breaches of any aspect of the Strategy may be dealt with as follows:

- if the alleged breach relates to the actions of an employee, this will be managed, as
- appropriate, in accordance with the relevant CEDR procedure;
- if the alleged breach relates to a report of inappropriate behaviour of a staff member towards a student, this will be managed in accordance with the process set out in the CEDR Student Protection Processes;
- if the breach relates to a complaint made via the Record of Complaint about Non-Compliance with CEDR's Student Protection Processes, that complaint will be dealt with in accordance with the Procedure for Handling Complaints about Non-Compliance with CEDR'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 CEDR Student Protection Processes or complaints
- procedures, as appropriate; and
- if the breach relates to the action of a contractor this will be managed in accordance with CEDR's contract with the contractor.

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

6. **A Planning Process for High-Risk Activities and Special Events (including any variation to school routine)**

It is a requirement that a planning process is in place from a student protection perspective in relation to high-risk activities and special events. Such processes are a key element of



ensuring the safety and well-being of students. Where possible, there is an alignment between high-risk activity planning for Workplace Health and Safety (WHS) and Student Protection.

The CEDR *Procedures for School Excursions and Camps for Catholic Schools in the Rockhampton Diocese* contains planning considerations from a student protection perspective and requirements, including instances involving the transporting of students.

CEDR also implements *Procedures for Communicating Appropriate Behaviour in Early Learning and Care Service Toilets*, *Procedures for Communicating Appropriate Behaviour in Primary School Toilets and Change Areas* and *Procedures for Communicating Appropriate Behaviour in Secondary College Amenities*.

Risk management processes for curriculum activities also capture key student protection requirements.

CEDR uses and comply with the Curriculum Activity Risk Assessment (CARA) as a minimum standard for risk management of curriculum activities and acknowledge the sharing of resources by the Queensland Department of Education in this area.

Our procedure supports the safe delivery of the curriculum outlining:

- the responsibilities of staff and
- the process for curriculum activity risk management when conducting curriculum activities in schools and other locations.

The CARA process includes the following:

1. Identifying risks and hazards in context
 - Which students will be involved
 - Where will students be
 - What will students be doing
 - What will students be using
 - Who will be leading the activity.
2. Assessing the risks in context
 - Assessing the likelihood of an incident happening and,
 - The consequence if it did happen.
3. Allocating an inherent risk level for the activity
4. Determining the control measures
5. Implementing the control measures
6. Reviewing the control measures

The risks we are looking to identify will not only include environmental and equipment risks but it is essential to also focus on the risks of physical, emotional or psychological harm to children which may occur.

CEDR has a strong commitment to the care and protection of its staff, students and others who participate in school life.



In particular, student protection is integral to learning and teaching. It is recognised that students are harmed, or could be at the risk of harm, from many sources, including self-harm. One factor in controlling the risk of harm to students is ensuring that visibility requirements are met when working with students, particularly in a one-to-one situation.

The visibility audit is designed to highlight potential areas of low visibility in the school and recommend structural or procedural changes that will ensure staff and students are not placed in positions of risk.

Schools are required to ensure that visibility risks are identified and managed accordingly. These include but are not limited to:

- Ensuring all doors have glass inserts or there is visibility provided via another means (i.e. windows)
- Identifying areas in playgrounds where there is lack of visibility
- Ensuring visibility into all classrooms.

Visibility Audits are required to be completed annually as per the WHS checklist that is submitted to the Catholic Education Office.

7. Policies and procedures for compliance with Chapter 8 (Blue Card Compliance)

As per the requirements with the *Working with Children (Risk Management and Screening) Act 2000*, Employee Blue Cards are monitored through the Blue Card Registers at the school level, and through the Blue Card records at the Catholic Education Office via the Blue Card Portal. Monitoring of Blue Card status is ongoing, with communication between the Catholic Education Office and schools to ensure the appropriate renewal and application processes are followed. Further information regarding Blue Card requirements and processes can be obtained from the Queensland Government Blue Card Services website.

8. Strategies for communication and support for all stakeholders including children and young people

CEDR utilises many mechanisms to ensure awareness for staff, students and families around Student Protection and the *Child and Youth Risk Management Strategy*, including:

- School Student Protection Contacts posters within schools
- Provision of a publicly available *Student Protection policy and Student Protection Processes and Guidelines* on the CEDR website
- Publishing this *Child and Youth Risk Management Strategy* on the CEDR website. Subsequently, each CEDR school and kindergarten will take ownership of the CEDR Child and Youth Risk Management Strategy and place a link back to the document on the CEDR website as the most up-to-date version of the document.
- Student Protection information for students, including the implementation of a child safety curriculum, the Daniel Morcombe Child Safety Curriculum
- The *Student Protection and Integrity in Relationships* brochures
- Training and Professional Development for staff, including but not limited to Student Protection, Student Protection Annual Training and the Code of Conduct. These resources and strategies are continually implemented and reviewed to ensure optimal communication and awareness.

CEDR is committed to achieving high standards in our school communities and values all feedback. In the event a complaint arises with regard to the application of our *Student Protection Processes and Guidelines*, complaints can be made in the mechanisms detailed in the *Complaints Procedure for Non-compliance with Catholic Education Student Protection Processes and Guidelines*. This document is available on the CEDR website.

9. Visibility Requirements

Implementation responsibilities for schools

In order to comply with the *Child and Youth Risk Management Strategy*, schools are required to follow and implement the requirements as detailed within this document including:

- Ensuring that all relevant policies and procedures are followed, for example the *Student Protection Processes and Guidelines*
- Ensuring that all school staff receive training and guidance in applicable areas
- Ensuring that risk management plans are developed and implemented for all high-risk activities.

Should you have any questions regarding the *Child and Youth Risk Management Strategy*, please contact the Student Services Manager or the Principal.

References

- *Student Protection policy*
- *Student Protection Processes and Guidelines*
- *Code of Conduct*
- *Workplace Health and Safety policy*
- *Termination of Enrolment of Students policy*
- *ICT Code of Practice*
- *Statement of Principles*
- *Staff Recruitment Procedures and Leave Booklet*
- *Teacher Induction Handbook*
- *Induction of Volunteers*
- *CEO Staff Induction Guidelines and Procedures*
- *Complaints Procedure for Non-Compliance with Rockhampton Catholic Education Student Protection Procedures*
- *Agreement for Visiting Teachers / Specialists*
- *Weapons in Schools - Procedure for dealing with weapons in CEDR Schools*
- *Visibility Audit General Information*
- *Procedures for School Excursions and Camps for Catholic Schools*
- *Student Protection brochure*
- *Integrity in Relationships brochure*