CHILD PROTECTION POLICY

Policy adopted from Nambour Christian College 2011 and replaced previous policy.

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<th>ADOPTED GCC</th>
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<td>11 August 2011</td>
<td>2013 04 30 2015 05 18 2016 05 24</td>
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1. INTRODUCTION

An important facet of the Mission of Gulf Christian College, herein referred to as the College, is to provide a secure and supportive, Christ-centred learning community for every student. In such an environment, students will feel secure and be encouraged to reach their full potential and mature into effective members of society. The Child Protection Policy addresses instances where students may have suffered harm or been exposed to inappropriate behaviour or sexual abuse or suspected sexual abuse. It is one of a number of policies formulated to protect students and staff providing the basis whereby the Mission is translated into reality.

Under legislation, duty of care obligations, and the Faith basis of Gulf Christian College is committed to providing a safe environment to all students and to upholding their best interests and wellbeing.

The College has in place a number of Policies addressing the health, safety and workplace wellbeing of staff and students.

Where there is any conflict between other policies, this policy, the Child Protection Policy will prevail.

The processes detailed in this Policy are designed to facilitate these commitments and are compliant with Regulation 10 of the Education

2. **Scope**

This policy and the procedures comply with Queensland child protection legislation and the requirements under Regulation 10 to provide processes which address the protection and wellbeing of Students and Staff. It applies to all complaints of sexual and physical abuse, to other types of harm and to Inappropriate Behaviour. It applies to all Staff and Students at the College.

3. **The Law**

a) The College obligations in relation to this policy are covered in the following:

- Education (General Provisions Act) 2006
- Education (Accreditation of Non-State Schools) Act and Regulation 2006 and Regulation 2001 as amended in 2014
- Anti-Discrimination Act 1991
- Education (Queensland College of Teachers) Act 2005
- Education & Training Amendment Act 2011
- Work Health & Safety Act 2011
- Child Protection Act, 1999 as amended in 2014
- Criminal Code Act 1999

b) Related Documents:

- Statement of Faith
- Contract of Employment
- Professional Standard for Queensland Teachers

4. **Principles**

This policy is founded on the following principles:

a) Every child has a right to protection from harm.

b) The welfare and best interests of the child are paramount.
c) Families have the primary responsibility for the upbringing, protection and development of their children.

d) Under the Contract of Enrolment, the College and Parents will work together in the best interests of the Child.

e) All actions taken by the College will be in the best interests of the child and will include the reporting of any suspected criminal behaviours regardless of family issues.

f) As part of its pastoral care commitments, the College will provide appropriate support to the child and family where an alleged harm has taken place.

The following additional principles are acknowledged and adopted, as applying to Aboriginal or Torres Strait Islander children:

i. The child should be allowed to develop and maintain a connection with the child’s family, culture, traditions, language and community.

ii. The long term effect of a decision on the child’s identity and connection with their family and community should be taken into account.

g) The College will screen new staff / volunteers in relation to their suitability to work with children. [Suitability Card & Teacher Registration will ensure compliance].

h) The College will not tolerate behaviours which breach the law and this Policy. Such behaviours will result in penalties being imposed by the College.

i) The College will provide pastoral care to alleged offenders if they are students or employees of the College.

j) The confidentiality of all parties will be respected.

5. DEFINITIONS

a) Child - means a person up to the age of 18 years of age.

b) Student - means any person regardless of age who is enrolled at the school.

c) College - means Gulf Christian College P-7 for the purposes of this policy.

d) Confidentiality. It is important when handling complaints information that the confidentiality of all parties concerned is respected. Information will be regarded as confidential if:

i. the information has the ‘necessary quality of confidence’ in that any unauthorised use would be detrimental to a party and that;
ii. it was shared or confided under circumstances where there was a special need for trust, i.e. between the harassment officer and the complainant, or between the Principal and the alleged offender.

iii. information will be shared only if it is necessary to comply with the requirements of this policy (delegated persons) or as required by law.

e) **Designated persons** – are persons designated to perform the duties, often in the absence of unavailability of senior staff.

f) **Staff** - includes all staff, without exception, whether paid or volunteers, eg those involved in teaching or administration, bus drivers, cleaners, groundsmen, sporting coaches, sporting referees, teacher assistants and volunteers working in any capacity for the College.

g) **Harm** (section 9 of the *Child Protection Act 1999* as amended in 2014) caused to a student under 18 years: is any detrimental effect of a significant nature on a student’s physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. The harm can be caused by physical, psychological or emotional abuse or neglect or sexual abuse or exploitation.

h) **Teacher** - is a person employed in the capacity of a registered teacher with the Queensland College of Teachers at the College, and includes full time, part time, casual and re-appointments.

i) **Sexual abuse** (*General Provisions Act, 2006*) in relation to a relevant person includes sexual behaviour involving the relevant person and another person in the following circumstances:

i. the other person bribes, coerces, exploits, threatens or is violent toward the relevant person;

ii. the relevant person has less power than the other person;

iii. there is a significant disparity between the relevant person and the other person in intellectual capacity or maturity.

j) **Inappropriate Behaviour by a Staff Member towards a student**: Inappropriate Behaviour is NOT defined by law.

It includes inappropriate behaviour by a staff member towards a student that any unwelcome behaviour by a College employee towards a College student that the student is uncomfortable with and breaches the trust implicit in a normal adult-student relationship, as defined by accepted societal values, professional and contractual obligations, current legislation and/or legal precedent. Behaviour which would be regarded by a reasonable person to be inappropriate between an adult and a child will be responded to as such even if the child does not reject it or indicate it is unwelcome.

NB. Many of these behaviours fall under the criminal offence of “grooming” or “maintaining a relationship with a Child” and could be dealt with under suspected abuse of a student.
k) **Reportable Suspicion** *(Child Protection Act, 1999)* as amended 2014 is one where a teacher (extended under the Policy to all staff):

i. has a reasonable suspicion that a Student has suffered, is suffering, or is at an unacceptable risk of suffering significant harm caused by physical or sexual abuse; and

ii. may not have a parent able and willing to protect the Student from harm.

l) **Neglect** - The term *neglect* in this policy may be defined as any act or omission whereby the Child is not cared for in the reasonable opinion of the School. According to the Department of Communities, neglect occurs when a Child’s basic necessities of life are not met, and their health and development are affected. Basic needs include:

- Food
- Housing
- Health care
- Personal hygiene
- Adequate clothing
- Hygienic living conditions
- Timely provision of medical treatment
- Adequate supervision

m) **Relevant Person** - means the Director mentioned in 365(1)(a) to (c), 365A(1)(a) to (c), 366(1)(a) to (c), or 366A(1)(a) to (c) of the General Provisions Act 2006. A relevant person is also defined under section 13E of the *Child Protection Act 1999* as a doctor, registered nurse, teacher, police officer, or person engaged to perform a child advocate function under the *Public Guardian Act 2014.*

n) **Employee** - of a school means a person engaged to carry out work at the school for financial reward.

o) **Natural Justice** – The principle of natural justice will apply to processes and decisions under this policy.

The principles of *Natural Justice* are that:

- A person alleged to have behaved improperly
  
  i. has a right to be informed of the allegations and particulars of what has been allegedly done;
  
  ii. has the right to respond to the allegations;
  
  iii. has a right to be heard in an unbiased forum.

p) **Notifier** - is a person who brings notice of a Student Protection matter to the attention of the College.
q) **Student Protection Contact Officers** – the two staff members (as required under the Accreditation Act 2001) to whom students may refer complaints. Written processes must clearly identify the names of the two staff members. These officers will be identified by name and image in the relevant Administration Offices at the school.

r) **Designated Board Director** - is the Director appointed unanimously by the Board to receive and report sexual abuse matters regarding students.

s) **Independent Protection Advisor** – is appointed by the College, and is independent of the College, but available for assessment of complaints.

t) **Vexatious Complaint** – a vexatious complaint is a complaint which has no substance and which may be brought with ill intent. Vexatious complaints may have serious consequences under the College Policy and legislation.

u) **Anonymous Complaint** – the school will act where possible to address such complaint.

v) **Unacceptable Risk** – if the report of alleged Inappropriate Behaviour/harm is of such concern that in the reasonable view of the Principal (with consultation) the person implicated would be a danger – that person can be stood down or suspended in the interim.

w) **Incident** – any activity or set of circumstances of Inappropriate Behaviour, sexual abuse, or suspected sexual abuse, or where harm has occurred or is reasonably suspected.

x) **Unprofessional Conduct** - is any behaviour which, by its nature, is inappropriate, unwise and has potentially damaging consequences and is contrary to Contractual Expectations or Professional Standards.

y) **Relevant State Authority** - is defined as the Police or Department of Communities Child Safety and Disability Services (DCCS DS).

z) **Family and Child Connect Services (FCCS)** – these are State established referral services to assist with vulnerable families.

6. **Policy Statement**

a) The College will comply with the mandatory reporting requirements under law.

b) The College has processes in place allowing it to respond to issues of Student Protection promptly and consistently.

c) The College will work in partnership with Specialist Services and State and National authorities.

d) The College will work as appropriate with Family and Child Connect Services.
e) The College will work in partnership with parents as part of the Contractual Relationship established by the Enrolment Contract.

f) The College will provide appropriate pastoral support for Students and families.

g) Penalties for breach of this Policy will attract College-imposed penalties additional to any imposed at law.

7. LEGISLATIVE REPORTING OBLIGATIONS

The relevant reporting obligations are outlined below (see also appended flow charts):

a) Education (General Provisions) Act 2006

Section 366 (Obligation to report sexual abuse of a person under 18 years at non-State school) and s. 365A (Obligation to report likely sexual abuse of a person under 18 years at non-State school) requires that a school staff member (first person) must immediately make a written report when they become aware or reasonably suspect the sexual abuse or likely sexual abuse of a student (relevant person EGPA) under 18 years of age by another person.

All staff members as the ‘first person’ must immediately report. A written report (FORM 1) is to be completed by the staff member with support by a Student Protection Officer and provided to the relevant school Principal.

If the allegation made relates to the Principal the report (FORM 1) must be made directly to a director of the schools governing body or the nominated delegate.

**Principal**: Will include all other relevant known information into the FORM 1 and immediately give the report to a police officer (relevant CPIU, QPS).

**Principal**: Will complete and provide the Report to;
- A director of the school’s governing body or the nominated delegate

**Principal** as the ‘first person’ must immediately give a written report (FORM 1) to a police officer (relevant CPIU, QPS) and provide a copy of the report (FORM 1) to a director of the school’s governing body or the nominated delegate.

**School’s governing body**: If a written report (FORM 1) has been provided to a director of the school’s governing body or the nominated delegate, the FORM 1 must immediately be given to a police officer (relevant CPIU, QPS).
The director or nominated delegate will complete and provide a relevant FORM to the DPS.

A maximum penalty of 20 penalty units may apply to persons who do not comply with the provisions of s.366 EGPA. No penalty exists for breaches of s.366A EGPA.

**NOTE: Director’s delegation of legislative ‘function’ (EGPA)**

Section 366B, EGPA, provides that if a non-State school’s governing body has more than one director then all of the directors may by unanimous resolution, delegate the director’s function to an appropriately qualified individual. This ‘function’ must not be delegated to the Principal or any other staff member of the non-State school.

‘Function’ means the director’s function of receiving a report and giving a copy of the report to a police officer under ss 366 or 366A EGPA.

**b) Child Protection Act 1999**

Section 13E requires that ‘relevant persons’ must make a report when they reasonably and honestly suspect a child has suffered, is suffering, or is at risk of suffering significant harm caused by physical or sexual abuse and may not have a parent able and willing to protect the child from harm.

Teachers/Registered nurses: as a ‘relevant person’ must report to Child Safety when they have formed a reasonable suspicion under s13E CPA. A ‘relevant person’ may confer with other colleagues at the same entity to assist in the forming of a reasonable suspicion.

A Report FORM 2 is to be completed by the ‘relevant person’. The Report FORM 2 may be completed with guidance from a SPO.

**Note: the legislative responsibility is on the ‘relevant person’ to directly report to Child Safety.**

**Principal:** Will complete and provide FORM 2 to the Chair of the school’s governing body.

If the allegation made relates to the Principal a copy of the Report FORM 2 is to be provided to the Chair of the school’s governing body.

No legislative penalties apply to persons who do not comply with the provision of s.13E CPA. If a ‘relevant person’ as an employee of Gulf Christian College, is found to be in breach of this reporting provision of the CPA, internal disciplinary processes will apply.

Section 13B provides the sharing of information to a relevant service provider if there are concerns that the child is likely to become a child in need of protection if no preventative support is given.
Principal: will, if appropriate, arrange for the child and/or family to be referred (with consent or without consent) to a relevant community based support service e.g. Family and Child Connect (FaCC) service. A SPO may refer a child and/or family with consent to a relevant community based support service. A family can self refer to a FaCC.

Note: ONLY the Principal as the ‘prescribed entity’ can refer without consent.

c) **Education (Queensland College of Teachers) Act 2005**

Section 76 requires that if the employing authority for a prescribed school investigates an allegation of harm caused or likely to be caused to a child because of the conduct of a relevant teacher of the prescribed school, the employing authority must as soon as practicable after the investigation starts give notice to the Queensland College of Teacher in accordance with s.76 (3).

A maximum penalty of 40 penalty units apply for breaches of s.76 **E(QCoT) Act 2005**.

Section 77 requires that if the employing authority starts an investigation (s.76) the employing authority must as soon as practicable after the investigation ends for any reason, give notice to the Queensland College of Teachers of the outcome of the investigation. The notice must include the information required in s.77 (3).

A maximum penalty of 40 penalty units apply for breaches of s.77 **E(QCoT) Act 2005**.

If a written report for sexual abuse or likely (ss.366 or 366A **EGPA**) involving a teacher has been given to a police officer, and the teacher resigns from the school, the employing authority is to inform the Queensland College of Teachers by way of an interim notice under the requirements of s76.

If the employing authority dismisses a teacher of the school in circumstances that, in the opinion of the school, call into question the teacher's competency to be employed as a teacher and a notice is not required in accordance with ss.76 and 77 of the **EQCoT** as outlined above, the school must give notice (completed in accordance with s.77 of **EQCoT**) to the Queensland College of Teachers within 14 days after the dismissal was given to the teacher.

A maximum penalty of 40 penalty units apply for breaches of s.78 **E(QCoT) Act 2005**.
d) **Blue Card Services** can be contacted for advice where concern involves a non teaching employee.

e) **Regulation 10 of the Accreditation Regulation 2001** requires a school to have in place procedures and process for responding to Complaints of inappropriate behaviour by a staff member.

f) **Education (Accreditation of Non-State Schools) Regulation 2001**

Section 10 **Health, safety and conduct of staff and students**, requires schools to have a written process in place for the reporting and responding of inappropriate behaviour of a staff member towards a student. The Student Protection Policy of Gulf Christian College has been broadened to include volunteers.

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<tr>
<th>Employees</th>
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<tr>
<td>All employees will as soon as practicable report (FORM 3) all allegations of inappropriate behaviour of an employee or volunteer towards a student to a SPO, the Principal or if warranted, to the nominated delegate of the relevant College Board.</td>
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<tr>
<td>If a SPO receives the allegation, they are to ensure that a FORM 3 is completed and the form immediately provided to the Principal.</td>
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<tr>
<td>A copy is to be provided by either the Principal or the Chair (as applicable), to DPS.</td>
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<tr>
<th>Volunteers</th>
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<tr>
<td>All volunteers will report as soon as practicable all allegations of inappropriate behaviour of an employee or volunteer towards a student to a SPO. The SPO is to complete FORM 3 based on the information provided by the volunteer.</td>
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<tr>
<td>The SPO will immediately provide the completed FORM 3 to the Principal. If the allegation relates to the Principal the SPO will provide the FORM 3 to the Chair or the nominated delegate of the relevant College Board.</td>
</tr>
<tr>
<td>A copy of the FORM 3 is to be provided by either the Principal or the Chair (as applicable).</td>
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8. **RESPONSIBILITIES UNDER POLICY**

a) **College Board**

   i. will discharge their duties in accordance with Regulation 10(6)(a-d);

   ii. will receive regular reports from the Principal at Board Meetings;

   iii. will ensure the College Formal Complaints Policy covers Child Protection complaints;

   iv. will appoint a Designated Director to receive and report (to external authorities) any allegations relating to sexual abuse, including likely sexual abuse.

b) **CEO**

   The CEO will provide an annual report regarding any mandatory reporting issues to the Board.

   The CEO will provide a Board Report at each meeting detailing issues relating to:

   - Work Health and Safety, and
   - Child Protection

   The CEO will be available to assist with direct responses to Child Protection issues.

c) **Principal**

   - will promote and arrange for in-service training of matters for Staff in legal compliance with Child Protection legislation and matters contained in this Policy.

   - will appoint two Student Protection Officers as points of contact for child protection issues.

   - will continue implementation of procedures by the Screening Policy for all persons involved in the College, as required by law.

   - will seek advice as available from the College Legal Protection Advisor

   - in all matters of sexual abuse allegations, advise the Designated Board Director, under S.366 A General Provisions Act (Amendment Act) 2011;
• will investigate reports of Inappropriate Behaviour internally and according to the principles of Natural Justice.

• will respond to concerns raised about psychological or emotional harm, neglect and exploitation including as appropriate by investigation or referral to Family and Child Connect Services, Department of Communities Child Safety and Disabilities Services / Police, and specialist services;

• will take all necessary action in the standing down of any Staff/Student in relation to matters covered by this Policy and carrying out any disciplinary measures noted in the Policy;

• cooperate with authorities seeking to interview a child at school will take all necessary action in the standing down of any staff/student in relation to matters covered by this policy and carrying out any disciplinary measures noted in the policy.

• will promote the role of the Student Protection Officers within the College and ensure that staff, students and parents are aware of this Policy and the reporting procedures.

• will report any investigation carried out regarding the conduct of a teacher to the Queensland College of Teachers.

d) **Designated Board Director**

The delegate will be identified to parents, students and staff to facilitate reporting.

Will be available to receive and to report any allegations of sexual abuse, including likely sexual abuse.

e) **Student Protection Officers**

• will be appointed by the Principal.

• will undertake training in the role.

• will be known to staff and students and parents and should be a person that will be accessible.

f) **Teachers / Staff**

Teachers (and under this Policy, all staff):

• must comply with this policy and procedures regarding protective procedures

• must conduct themselves professionally
• must comply with mandatory reporting obligations and within the bounds of appropriateness and reasonable expectations. Must comply with mandatory reporting obligations under the Child Protection Act 1999, the General Provision Act 2006 and Regulation 10 of the Education (Accreditation of Non-State Schools) Regulation 2001 (all as amended).

• will respect confidentiality, (under a Confidentiality Agreement) of the person disclosing the allegations and the details of the allegations.

• Unless as otherwise obliged by legislation staff member under this policy must consult with appropriate people including Student Protection Officers and Principal, who will make the final decision about notification and inform the staff member.

g) STUDENTS

All students are encouraged to inform staff of any worry or concern they may have about their safety. All students are expected to contribute to the care and wellbeing of other students by complying with all School Policies, rules and directions.

9. TYPES OF ABUSE

Harm may include significant examples of the following:

(a) Physical abuse and excessive punishment

(b) Emotional abuse

(c) Emotional deprivation

(d) Physical neglect and/or inadequate supervision, and

(e) Sexual abuse and exploitation.

10. TIMELY RESPONSE

The Principal will ensure that a timely response to all issues of Child Safety and wellbeing will be made.

11. INVESTIGATION

(a) The College Staff do not in any way investigate mandatory reporting matters. They will co-operate with the State and National authorities.
(b) For an action falling short of mandatory reporting, the Principal may decide on a number of responses including investigating the matter internally or with assistance of an external investigator.

(c) Other actions may include:

   i. Working in partnership with parents.

   ii. Referrals to specialist services and Family and Child Connect Services.

   iii. Notifying Child Safety and Police as a matter of discretion (even if not mandatory).

12. CONSEQUENCES OF BREACH OF POLICY

(a) Consequences of Breach of Policy

   (i) Conduct which breaches this Policy may result in criminal penalties as decided by legal process.

   (ii) in all such cases the Principal will stand down a staff member pending the result of investigation by the Police.

(b) Other breaches of this policy, which may result in external penalties, will result in consequences imposed by the Principal and may include:

   ▪ apology
   ▪ counselling
   ▪ warning
   ▪ demotion
   ▪ suspension
   ▪ standing aside
   ▪ termination
   ▪ expulsion (in the case of a student)

(c) Where a complaint / allegation is found to have no substance, every effort will be made to re-instate the alleged offender’s status and reputation.

13. PROTECTION FOR NOTIFIER

(a) The Child Protection Act 1999 provides for the confidentiality of information supplied by the person making a notification.

(b) Also Section 22 of the Act provides for the protection from civil liability for persons, who, acting honestly, notify or give information about suspected harm to a Child. It states that merely because the person gives the notification or information, the person cannot be held to have breached any code of professional etiquette or ethics, or departed from accepted standards of professional conduct.
In accordance with this Act the College will protect the identity of the Notifier of information – unless required otherwise by Law.

14. ANONYMOUS COMPLAINTS

Such complains, by their very nature provide difficulties, however the College will investigate the validity of each one to the extent possible.

15. RECORD KEEPING

Any staff member who has concerns about the safety or wellbeing of a Child, either suspicious or disclosed MUST complete the appropriate form:

These forms will be collected by the Principal or his/her delegate and kept in a secure place.

(a) keep anecdotal records of dates, time and observations, focusing on the persistence of indicators over time and the severity of effects.

(b) if speaking to a child, keep questions to what/where/when

(c) take only short notes – must not investigate.

(d) Provide note to Principal.

(e) should the Principal need to interview the child further, the same procedures must be followed.

(f) records must be kept in a locked file by the Principal.

16. LENGTH OF TIME RECORDS WILL BE KEPT

Reporting of a suspected criminal offence has no statute of limitations.

In all cases of possible ‘negligent issues’, the College will keep all records for three (3) years beyond the child’s 18th birthday.

17. COMPLAINTS PROCEDURE

Any person who wishes to make a complaint about alleging breach of this policy is required to:

(a) Put matter in writing providing sufficient details

(b) Provide to Principal
The Principal will respond to the complaint in line with the Formal Complaints Policy.

18. ROLE OF CHILD PROTECTION AGENCIES

As part of the coordinated interdepartmental approach to child abuse, officers of the Queensland Police Service and the Department of Communities (Child Safety) are responsible for investigating and assessing any report of harm or suspected harm or neglect from any source and to ensure the well-being and safety of the child.

19. HARM NOT COVERED BY SPECIFIC LEGISLATION

(a) BULLYING AND HARASSMENT

During their schooling, students may be at risk of bullying and harassment. In most cases this will not be reported to external authorities, (unless it involves criminal behaviour or is harm under the definitions supplied in this policy).

(b) SELF-HARM

Known or suspected incidents of self injury (eg sniffing) must be reported to the Principal.

The Principal will consult with the CEO to determine what course of action should occur. Possible actions to include:

- contacting parents
- consulting with the Child and Youth Mental Health Service
- arranging professional assistance
- consulting with the local office of the Department of Communities (Child Safety)

20. PROCEDURES – SITUATION OF HARM OCCURRING WITHIN THE COLLEGE

Harm may occur to a child in an adult/student or student/student circumstances. In both cases these procedures as outlined in Reporting Summaries 1-3 below should be followed.

21. PROCEDURES – SITUATIONS EXTERNAL TO THE COLLEGE

Refer to Annexure E for indications of harm caused external to the College. In such cases the College will contact the relevant State authority whose response
is required under the Child Protection Act. This may include interviewing the child at the school (have a support person with the child)

The Principal will offer pastoral care to the student and family.

The procedures as outlined in Reporting Summaries 1-3 below must be followed.

22. REVIEW OF POLICY

This Policy will be reviewed every two years or as required by legislation.
**APPENDIX A**

**TRAINING – PROTECTIVE BEHAVIOURS GUIDELINES**

**FOR STAFF AND VOLUNTEERS**

Gulf Christian College is committed to the safety and wellbeing of all its students. We support the rights of the child and will act without hesitation to ensure a safe environment is maintained for all our students.

Gulf Christian College also supports the rights and wellbeing of all our staff and volunteers, and support their active participation in building and maintaining a safe environment for all concerned.

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<th>ALWAYS</th>
<th>NEVER ...</th>
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<tr>
<td>• conduct yourself in a manner consistent with your position and role as an employee of Gulf Christian College, and follow the College’s guidelines and protection policy of students.</td>
<td>• hold, kiss, cuddle or touch students in an inappropriate or culturally insensitive way.</td>
<td>• When interviewing, talking to, or tutoring a student always be aware of your locality, and maintain appropriate safeguards to ensure open accountability of your actions and behaviour.</td>
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<tr>
<td>• treat students with due respect, and be aware of your personal and professional behaviour towards them.</td>
<td>• do things of a personal nature that a child can do for themselves, such as going to the toilet or changing clothes.</td>
<td>• Be circumspect when supervising amenity blocks, change rooms and toilets. Announce your approach loudly. Segregation of staff and student amenities must be observed at all times.</td>
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<tr>
<td>• raise any concerns about the wellbeing of a student with your supervisor, and ensure that all allegations or suspicions of abuse are recorded and responded to.</td>
<td>• physically search a student or his property, and only invite they turn out their pockets, bags, etc with a witness in attendance.</td>
<td>• Arrange group activities in preference to working with individual students, including chores, preparation, set-up, and clean up.</td>
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<td>• When interviewing, talking to, or tutoring a student be cautious of never being alone or in a private setting.</td>
<td>• take a student to your home, or encourage meetings outside of the College program.</td>
<td>• Ensure that camps and excursions are authorised by parents and the College, with a minimum of two adults attending any overnight camp.</td>
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<tr>
<td>• While counselling/ advising a student requires a confidential setting – have a place appropriate with safeguards, e.g. a pane of glass in the door so staff person (not students) can be seen, have doors without locks. Choose a place which is not too isolated or overly private.</td>
<td>• engage in sexual conduct of any nature with any student at any time; the age of the student and any consensual agreement are irrelevant.</td>
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<td>• make sexually suggestive comments to any student, even as a joke.</td>
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<td></td>
<td>• transport individual students in your vehicle.</td>
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# APPENDIX B

## TRAINING - INDICATIONS OF SIGNIFICANT HARM – APPLIES PREDOMINANTLY TO EXTERNAL ABUSE

<table>
<thead>
<tr>
<th>Sexual abuse and Sexual exploitation</th>
<th>Emotional abuse</th>
<th>Neglect</th>
<th>Physical abuse or non-accidental injury</th>
</tr>
</thead>
<tbody>
<tr>
<td>Injury to, or itching of, child’s genitals</td>
<td>Child extremely withdrawn, anxious or depressed.</td>
<td>Constant seeking of adult attention.</td>
<td>Bruises, welts, cuts, lacerations, burns, human bite or grab marks, and other injuries which are unexplained or could not have been self-inflicted.</td>
</tr>
<tr>
<td>Child reporting sexual behaviours</td>
<td>Child overly compliant or excessively aggressive</td>
<td>Child developmentally delayed.</td>
<td>Repeated injuries or accidents which are bizarre or vaguely described.</td>
</tr>
<tr>
<td>Child exhibiting sophisticated sexual knowledge or bizarre behaviour</td>
<td>Child excessively criticised</td>
<td>Consistent listlessness, fatigue, lethargy.</td>
<td>Bruising on a young baby who is not yet mobile.</td>
</tr>
<tr>
<td>Child showing a fearful avoidance of adults of a particular sex.</td>
<td>Child rejected or over-protected.</td>
<td>Child underweight or constantly hungry.</td>
<td>Discipline inappropriate for child’s age and development.</td>
</tr>
<tr>
<td>Sudden marked decline in child’s academic performance</td>
<td>Child failing to thrive for no medical reason.</td>
<td>Child’s medical or dental problems unattended, lack of physical hygiene.</td>
<td>Care provider seemingly unconcerned about child’s condition.</td>
</tr>
<tr>
<td>Mother frequently absent</td>
<td>Child making constant negative comments about own behaviour. “I’m bad, I’m no good”.</td>
<td>Child left alone at home or left unattended, when injuries may occur or when child’s health may be endangered.</td>
<td>Delay in seeking medical attention for child.</td>
</tr>
<tr>
<td>Male care provider misusing alcohol or drugs.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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*Page 19 of 32*
## Training – Student Protection Record

[Where State Authorities Interview Child at School]

<table>
<thead>
<tr>
<th>Record of interview with students for whom there are student protection interviews conducted by Department of Communities and/or Police, at school.</th>
</tr>
</thead>
<tbody>
<tr>
<td>This form is to be completed by the Principal (or delegate) and retained confidentially at school level. File the form in a secure location with other student protection documentation.</td>
</tr>
</tbody>
</table>

1. School: Dept. or Police wish to interview

2. Student Department (DOCS) or Police wish to interview: [ ]

3. Date of request:

4. Time period within which contact is required

| Immediate / today | < 5 days | 5 days – 14 days |

5. Agency / Agencies intending to interview student

| Department of Child Safety | Police Service |

6. Officers who are requesting to interview student

| Name | Position | Agency (Police or DOCS) |

7. Parent Notice

Please ✔ relevant boxes (below) after obtaining information from DOCS or Police about the legal requirements under the Child Protection Act 1989.
It is in the child’s best interests that the officer has contact with the child before the child’s parents are told about the investigation and/or

- The child’s parents knowing in advance about the proposed interview with the child is likely to adversely affect or otherwise prevent the proper conduct of the investigation.
- Department of Child Safety
- Queensland Police Service
- Will, as soon as practicable after the officer has had contact with the student, tell at least one (1) of the student’s parents that the officer has had contact with the student and the reasons for the contact.

NB. The school is not to inform parents of interviews unless requested to do so by DOCS or Police.

<table>
<thead>
<tr>
<th>School support person</th>
<th>Did the school provide the student with a support person during the interview?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>□ Yes Name of Support Person: ____________________________</td>
</tr>
<tr>
<td></td>
<td>□ Did the State Authority provide support?</td>
</tr>
</tbody>
</table>

Signature of Principal: ____________________________ Date: __________________

(Delegate)
# Names of Student Protection Officers

<table>
<thead>
<tr>
<th>STUDENT PROTECTION OFFICERS:</th>
</tr>
</thead>
<tbody>
<tr>
<td>The College has appointed the following to the role of Student Protection Officer</td>
</tr>
<tr>
<td>Jake Randall</td>
</tr>
<tr>
<td>Cynthia Thomas</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DESIGNATED BOARD DIRECTOR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suzanne Brooks</td>
</tr>
<tr>
<td>Suzanne Brooks, LLB (Hons)</td>
</tr>
</tbody>
</table>
PRIVATE & CONFIDENTIAL
SUSPECTED SEXUAL ABUSE OR LIKELY SEXUAL ABUSE REPORT FORM
Sections 366 + 366A Education (General Provisions) Act 2006

Date: ____________________
School: ____________________ Phone Number: ____________ Fax Number: ____________
School Address: ____________________ Suburb: ____________ State: ____________ Postcode: ____________
Reporter's name: ____________________ Position: ____________________
Contact Phone: ____________________ Email Address: ____________________

Provide details regarding when you are available to be contacted if Police require further information:

Principal’s name: ____________________ Contact Phone: ____________________ Email Address: ____________________

Sexual Abuse  ○ Actual/Alleged  ○ Suspected  ○ Likely  Date concerns identified: ____________________

DETAILED STUDENT SEXUALLY ABUSED OR LIKELY SEXUAL ABUSE

Student 1:
Surname: ____________________ Given Names ____________________
Date of Birth: ________ ○ Male  ○ Female  ○ Intersex  Year Level: ____ ○ Aboriginal  ○ Torres Strait Islander  ○ Aboriginal & Torres Strait Islander Cultural Background: _______________ Does the student have a disability: ○ Yes  ○ No  If yes, Disability: ____________________
Student’s Address: ____________________
Phone Number: ____________________

Is the student in the care of the State? ○ Yes  ○ No  If yes, provide the name of the Child Safety Officer: ____________________

Are there relevant orders in place? ○ Yes  ○ No  If yes, please specify: ____________________
(e.g. Child Protection, Domestic Violence, Family Law Court)

When the child/ren reside in multiple households, outline current care arrangements (if known) ____________________
Current location of child/ren (if known) __________________________________________

**PERSON ALLEGED TO HAVE CAUSED THE SEXUAL ABUSE OR LIKLEY SEXUAL ABUSE**

- Adult Family Member
- Child Family Member
- Other Adult
- Student/other child
- Unknown

**Provide all information which led to the suspicion of sexual abuse or likely sexual abuse**

Details of person alleged to have caused the harm:

Surname: ___________________________ Given Names: ___________________________ Relationship to Student: ___________________________

Address: ___________________________

Detail of any sexual abuse to the student – Please include: Time and date of incident, source of information, physical appearance of any injury, immediate and ongoing safety concerns, any disclosures made by the student, any previous incidents of harm or behavioural indicators of harm, presence of any medical needs or developmental delays.

________________________

Details of anyone else who may have information about the alleged abuse – Please include name/s and contact details of other persons who may have information.

________________________

Are you aware of any prior relevant contact this family has had with:  
- Child Safety
- Queensland Police Service
- Queensland Health/CYMHS

Are you aware of any other schools that might hold relevant child protection information in relation to this family?  
- Yes
- No

Any additional information or comments?

________________________
PRIVATE & CONFIDENTIAL
NOTIFICATION OF REPORTABLE SUSPICION OF SEXUAL ABUSE OR PHYSICAL ABUSE
Under the Child Protection Mandatory Provision 13E

Date: ____________

School: __________________________________________ Phone Number: __________________________

School Address: __________________________________ Suburb: _____________ State: ___________ Postcode: __________

Abuse/Assault  ○ Sexual  ○ Physical  ○ Psychological/Emotional  ○ Neglect  Date concerns identified: ____________

DETAILS OF STUDENT ALLEGEDLY ASSAULTED/HARMED

Student 1: Age: __________ Year Level: __________ Gender: __________________________

Is the student in the care of the State?  ○ Yes  ○ No

Are there relevant orders in place?  ○ Yes  ○ No  If yes, please specify: ______________________________________

(e.g. Child Protection, Domestic Violence, Family Law Court)

NOTIFIER/REPORTER

○ Teacher  ○ Registered Nurse

PERSON ALLEGED TO HAVE CAUSED THE ASSAULT/HARM

○ Adult Family Member  ○ Child Family Member  ○ Student/Other Child  ○ Employee  ○ Other Adult

Provide a précis of information you have which led to the concern or suspicion of the alleged assault/harm

Details of any alleged abuse to the student – Please include: Time and date of incident, source of information, physical appearance of any injury, immediate and ongoing safety concerns, any disclosures made by the student, any previous incidents. IDENTIFYING DETAILS NOT TO BE INCLUDED (E.G. NAMES).

Does Parent/Carer have knowledge of the incident?  ○ Yes  ○ No

If yes, what was the response? IDENTIFYING DETAILS NOT TO BE INCLUDED (E.G. NAMES).
Reported to: ☐ Child Safety

Relevant Office: ___________________________ Date Reported: ___________________________

Any additional information or comments?

Reporters Name: ___________________________ Role: ___________________________ Signature: ___________________________

Date: ___________________________
PRIVATE & CONFIDENTIAL
INAPPROPRIATE BEHAVIOUR REPORT FORM under POLICY
REPORTING ALLEGATION OR INCIDENT INVOLVING A STAFF MEMBER OR VOLUNTEER

Date: ____________
School: ____________________________________________ Phone Number: ____________ Fax Number: ____________
School Address: __________________________________ Suburb: ____________ State: ____________ Postcode: ____________
Principal’s name: __________________________________ Contact Phone: ____________ Email Address: ____________
Reporters name: __________________________________ Position: ____________________________
Contact Phone: ____________ Email Address: ____________
Dates concerns identified: ____________________________

DETAILS OF STUDENT SEXUALLY ABUSED OR LIKELY SEXUAL ABUSE

Student 1:
Surname: ____________________________ Given Names ____________________________ Alias/es (last name, first name) ____________
Date of Birth: _______ ○ Male ○ Female Year Level: ___ Phone Number : ____________ Student’s Personal Mobile: ____________
Is there another student for this report? ○ Yes ○ No

PERSON ALLEGATION IS MADE AGAINST
○ Teacher ○ Non-teacher ○ Volunteer
Surname: ____________________________ Given Names: ____________
School: __________________________________ Position/Role: ____________
Work Number: ____________ Mobile Number: ____________
Do the allegations relate to another person? ○ Yes ○ No

Allegation Details: Please include: Time and date of incident/s, outline the allegation, any disclosures made by the student, any previous incidents of inappropriate behaviour.
Parent/Carer’s knowledge of incident and their response if known.

Details of anyone else who may have information about the inappropriate behaviour – Please include name/s and contact details of other persons who may have information.

Details of action taken

Has the school appointed a person to investigate this complaint?  ○ Yes  ○ No

Any additional information or comments?

Additional information provided as an attachment?  ○ Yes  ○ No

Reports Name: __________________________ Reporter Signature: __________________________ Date: _____________

**ACTION TO BE TAKEN**

Report to Director of Professional Standards:  Date Emailed: __________________________

Copy to Chair of School/College Council or delegate: Name __________________________ Date Emailed: __________________________
A. CHILD PROTECTION – Flowchart: Mandatory Reporting of Sexual Abuse or Likely Sexual Abuse 2016
Reporting Sexual Abuse s.366A (AGPA 2006) under General Provisions Act

All Staff Members

Becoming aware or reasonably suspects that

Student under 18 years
Pre-preparatory age child – pre-prep program at school
Person with disability not enrolled in preparatory year

Sexually or likely to be sexually abused by another person

THAT FIRST PERSON

**Must immediately write report (Form 1)**

Give report (Form 1) to Principal or Director or Delegate Governing Body

Principal or Director/Delegate of Governing Body **must immediately write report (Form 1)**

**Must immediately give report (Form 1) to police**

A copy of report (Form 1) must be given to Director or Delegate of Governing Body

And subsequently provide S.76
B. CHILD PROTECTION – Flowchart: Mandatory Reporting Under Child Protection Act

Teacher / RN

Must Report under Legislation

Physical/Sexual Abuse

If they have a Reportable Suspicion a child

a) Has suffered significant harm* or is suffering significant harm, or is at an unacceptable risk of suffering significant harm

May confer with Colleagues

*The nature of significant harm is

AND

b) May not have a parent able and willing to protect the child from the harm

YES

Provide written report to Child Safety Services

NO

Activate other responses under Policy/Procedures

Consider referral to FaCC/IFS

Monitor and support
C. REPORTING UNDER SCHOOL CHILD PROTECTION POLICY

Excerpt as specified otherwise by Mandatory Reporting under legislation all staff (including Teachers and RN's) must report knowledge or reasonable suspicion of harm or inappropriate behaviour to a student to Student Protection Officers or the Principal.

- All Staff Members
  - Becoming aware or reasonably suspects that
    - A student
      - Is suffering harm or inappropriate behaviour (e.g., behaviour not requiring external mandatory reporting)
      - Report
        - To a Student Protection Officer or Principal or Delegate
          - The Principal or Director/Delegate will consider the information, provide/gather more information if appropriate and decide how to manage the situation most effectively by internal processes/investigation
          - School supports will be available to the child
            - Principal will consider referral options to FaCC/IFS
              - Consequences/outcomes will be activated and recorded