



Brisbane Boys' College
Child and Youth Risk
Management Strategy
2020



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ALWAYS refer to the electronic copy available on the BBC website for the latest version.



“Schools have a considerable responsibility for keeping children safe and promoting their health and wellbeing. A safe environment is essential for children to benefit from their school education.

Many schools are central to their communities and are a place where families, staff and other services are connected. In recognition of the crucial role of schools in the lives of almost all children, we recommend that all schools implement the Child Safe Standards identified by the Royal Commission.

As one stakeholder told the Royal Commission in consultations, ‘children flourishing remains everybody’s business and we need to be persistent’”

Royal Commission into Institutional Responses to Child Sexual Abuse, Schools private roundtable, Sydney, 2015.



PREFACE

The Child and Youth Risk Management Strategy forms part of the Blue Card prevention and monitoring system administered by Blue Card Services, the Department of Justice and Attorney-General, which aims to create safe and supportive service environments for children and young people.

Under the provisions of the *Working with Children (Risk Management and Screening) Act 2000*, and the *Working with Children (Risk Management and Screening) Regulation 2020* it is a requirement that regulated employers and businesses develop and implement risk management strategies to identify and minimise the risk of harm to children and young people in their service environment. Brisbane Boys' College is a regulated employer under the legislation.

To meet our legislative obligations, Brisbane Boys' College's Child and Youth Risk Management Strategy includes eight minimum requirements which are:

Commitment

1. A statement of commitment to the safety and wellbeing of children and the protection of children from harm, and
2. A code of conduct for interacting with children.

Capability

3. Written procedures for recruiting, selecting, training and managing staff and volunteers.

Concerns

4. Handling disclosures or suspicions of harm, including reporting guidelines
5. A plan for managing breaches of your risk management strategy, and
6. Risk management plans for high risk activities and special events.

Consistency

7. Policies and procedures for managing compliance with the blue card system, and
8. Strategies for communication and support.

The eight requirements aim to:

- 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 Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 6, Making institutions child safe, p 416, 2017 states that *"risk management strategies should support a structured approach to identifying and assessing the characteristics of an entity that may heighten the risk of child abuse. They are an important tool to keep children safe"*.

Each individual element of the Brisbane Boys' College Child and Youth Risk Management Strategy has been aligned to the Child Safe Standards¹ identified by the Royal Commission into Institutional Responses to Child Sexual Abuse which collectively show that a child safe organisation is one that creates a culture, adopts strategies and takes action to promote child wellbeing and prevent harm to children and young people.



PRINCIPLES

The following principles are the foundational elements on which BBC's Child and Youth Risk Management Strategy is based:

- having a prevention focus that addresses child safety.
- being developed by understanding the overall risk profile within BBC's context including
 - people
 - activities
 - place (physical and online environment)
- being developed from a clear evidence-informed base that only assesses BBC's specific settings, but also demonstrates appropriate consideration of the characteristics of abusers and victims, and how, when and where abuse tends to occur.
- attending more closely to risk situations where individuals have roles that involve working:
 - alone with children,
 - in private settings,
 - in intimate care routines with children e.g. counselling and guidance
 - in overnight settings
 - in residential accommodation (boarding)
 - overseas trips
- considering increased risks with children with heightened vulnerability but does not discourage positive relationships between adults and children, and healthy child development.

¹Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report Volume 13, Schools



- using a robust and consistent methodology to identify, assess, mitigate or remove actual and potential risks.
- requiring the reporting and monitoring of child safety risks at an organisational level, enabling effective leadership oversight of risks, treatment plans and mitigation strategies.
- being regularly monitored and reviewed.

The BBC Child and Youth Risk Management Strategy is evidence of Brisbane Boys' College's commitment to the safety and wellbeing of children and the protection of children from harm in fulfilment of the requirements of the *Working with Children (Risk Management and Screening) Act 2000* and the *Working with Children (Risk Management and Screening) Regulation 2020*, and Principle 1.5 of the National Principles for Child Safe Organisations which states "that to be a child safe organisation the entity must have risk management strategies which focus on preventing, identifying and mitigating risks to children and young people".

SCOPE

This Child Protection Risk Management Strategy covers all students, employees, volunteers, contractors, and members of the broader Brisbane Boys' College community.

REFERENCES

- AS 5725-2015 Boarding Standard for Australian schools and residences
- Australian Student Wellbeing Framework (2018)
- Child Protection Act (1999) (Qld)
- Child Protection Regulation 2011 (Qld)
- Complaint Handling Guide: Upholding the rights of children and young people 2019
- Education and Care Services National Law (Queensland) Act 2011(Qld)
- Education and Care Services Act 2013 (Qld)
- Education and Care Services Regulation 2013 (Qld)
- Education (General Provisions Act) 2006 (Qld)
- Education (General Provisions) Regulation 2006 (Qld)
- Education (Accreditation of Non-State Schools) Act 2017 (Qld)
- Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)
- Education (Queensland College of Teachers) Act 2005 (Qld)
- Education Services for Overseas Students (ESOS) Act 2000 (Cth)
- Education Services for Overseas Students Regulations 2019
- Education (Overseas Students) Act 2018 (Qld)
- Queensland College of Teachers - Professional Boundaries: A Guideline for Queensland Teachers
- The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018)
- The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 6, Making institutions child safe, 2017
- The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13, Schools
- Work Health and Safety Act 2011
- Working with Children (Risk Management and Screening) Act 2000 (Qld)
- Working with Children (Risk Management and Screening) Regulation 2020 (Qld)



COMMITMENT

A statement of commitment to the safety and wellbeing of children and the protection of children from harm

A child safe institution is committed to child safety. This commitment should be supported at all levels of the institution and be embedded in an institution's leadership, governance and culture, and all aspects of the institution's business and practice.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13, Schools.

Our Commitment to being a Child Safe Organisation

BBC is committed to continuously reviewing and improving our systems and practices to protect the children and young people in our care from harm.

Through the implementation, regular review and continual improvement of the national child safe principles, BBC will ensure that child safety and wellbeing is embedded in organisational leadership, governance and culture, our students are informed about their rights, that physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed, and BBC families and the wider College community are involved in promoting child safety.

The College is committed to ensuring our processes for complaints and concerns continue to be child focused and consistent with the *Child Protection Act 1999* and the PMSA Child Protection Policy, and our policies and procedures as they relate to child protection are reviewed and up-to-date.

BBC is committed to continuing to ensure the rigorous implementation of the Working with Children legislation as required under the *Education (Accreditation of Non-State Schools) Regulation 2017* through the continuous improvement of the processes, systems and mechanisms used to monitor, control and minimise working with children risk, and through compliance with the audit and assurance framework under the PMSA Blue Card (Working with Children) Policy.

The College will ensure that staff and volunteers continue to be equipped with the knowledge, skills and awareness to keep our students safe through ongoing education and training, and will provide a clear and consistent framework to assist all who work at BBC to value and guide their relationships with the children and young people in their care through the development, implementation and ongoing review of this Child and Youth Risk Management Strategy.

This commitment is evidence of the PMSA's fulfilment of the requirements of Schedule 1, section 4 (2)(1) of the Working with Children (Risk Management and Screening) Regulation 2020 and is aligned with the following National Principles for Child Safe Organisations –

- National Principle 1 – Child safety and wellbeing is embedded in organisational leadership, governance and culture



Our Commitment to Children and Young People

“Children are safer when institutions acknowledge and teach them about their rights to be heard, listened to and taken seriously. Article 12 of the United Nations Convention on the Rights of the Child (UNCRC) details the rights of a child to express their views and participate in decisions that affect their lives. Enabling children and young people to understand, identify and raise their safety concerns with a trusted adult and to feel safe within the institution is important”.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13, Schools

At the heart of BBC’s commitment to student wellbeing, is the College’s positive education and student wellbeing frameworks which place the wellbeing and happiness of each boy at the centre of our decision-making. This commitment is underpinned by our ‘*Wellbeing Promise*’, such that we will:

- Build upon our strong pastoral foundations through an evidence-based approach to positive education to create a strengths-based, holistic, wellbeing environment
- provide a whole-school wellbeing curriculum to guide our students
- nurture the resilience and tenacity of each student so they can thrive throughout their lives

BBC is committed to:

- Recognising and upholding the dignity and rights of all children and young people.
- Recognising each child and young person’s right to be heard and to have a voice in decisions affecting them.
- Listening to the voices of children and young people and empowering them to raise their concerns and report disclosures, allegations, suspicions or incidents of harm
- Ensuring concerns raised by children and young people are taken seriously
- Recognising children’s diverse circumstances, providing a culturally safe environment, and responding effectively to all children, including Aboriginal and Torres Strait Islander children, children with disability and children from culturally and linguistically diverse backgrounds
- Ensuring that matters affecting children and young people are heard and understood from the child or young person’s perspective
- Ensuring that children and young people are aware there are policies and processes in place to support them, and are provided information and support to understand what constitutes healthy and respectful relationships with peers, family and staff
- Supporting the self-esteem and confidence of children and young people with training to foster self-assertiveness
- Teaching and integrating protective behaviours into the curriculum

We aim to achieve our commitment to the children and young people in our care by promoting a strong alignment of student wellbeing across the entire school community through:

- Providing an organisational framework with which to:
 - Establish structures, roles and accountability for delivery of the various elements of student wellbeing
 - Clarify for staff, students and stakeholders the various elements of a robust student wellbeing system
 - Focus the work of staff at different levels on their responsibilities for the wellbeing of students
 - Develop and deliver programs
 - Focus activity into key areas of a total student wellbeing solution



- Ensure strong leadership, management and cultural framework for action.
- Every classroom teacher, Mentor, Year Team leader, Assistant Year Team Leader, coach playing an active role in fostering the wellbeing of the children and young people in their care
- Portfolio Leadership Teams including a Student Wellbeing Portfolio
- ACER Social-Emotional Wellbeing Survey
- Alannah and Madeline Foundation Digital License Program
- Student wellbeing pulse checks
- Student Mindfulness sessions
- School TV
- A vertical and horizontal wellbeing structure which facilitates the delivery of age-appropriate, sequential wellbeing programs and initiatives.
- Year Team Leaders, Assistant Year Team Leaders and Heads of House as dual points of contact for students and who oversee the academic, intellectual, emotional, psycho-social, community, leadership, and spiritual development of every boy.
- Mentors whose roles are critical to BBC's model of wellbeing and who meet students several times a week, focusing on each individual according to their interests, abilities, and potential for personal growth. Mentors take a holistic view of their students and come to know them across all domains of school life.
- A House System which provides an opportunity for boys to take responsibility for one another, engendering a strong sense of belonging, friendship and enabling boys of different ages to connect and collaborate across a range of sporting, cultural, leadership and social activities, and which places a great deal of emphasis on the welfare of each individual student.
- Emphasis on the 'whole child' nature of student wellbeing including the delivery of a purposeful and evidence-based wellbeing curriculum
- Director of Positive Education and Wellbeing role that provides theoretical and practical expertise to support the work of the Year-based teams and who has delegated responsibility for the development, operation and growth of wellbeing and the Brisbane Boys' College Positive Education framework
- The adoption of the five domains of effective student wellbeing models:
 - **Preventative and proactive** knowledge and skill building within students that *anticipates* 'critical incidents' with an aim of preventing or reducing impact.
 - **Developmental activities** that promote social, moral, spiritual, and cultural development and wellbeing. This integrates all aspects of extracurricular development and core curricula programs.
 - **Intervention and reactive** casework, critical incident management and partnerships with specialist agencies to support and assist children and young people in need.
 - **Culture and environment** school climate, leadership ethos, behaviours and values in action at every level and interaction with students, staff, and stakeholders
 - **Management** direction, processes, policy, systems, structure, capability, risk management, data and reporting –

Children and young people at Brisbane Boys' College know who to talk to if they are feeling unsafe and know what will happen. In addition to the PMSA Child Protection Policy, BBC also has an Anti-Bullying Policy, Anti-Bullying Protocols for Students, Parents and Staff and an online Bullying Action Report which are all available under the Policies section on the BBC website. A summary version of the BBC Anti-Bullying Policy in addition to information around sexual harassment and links to relevant child protection policies is available in the BBC Student Diary. BBC also has a Bullying Reference Group (BRG), the members of which are responsible for investigating incidents. Brisbane Boys' College also has student focused policies and procedures relating to expected behaviours (rights and responsibilities), anti-discrimination, disability, acceptable use of technology and social media use.



This commitment is evidence of the PMSA’s fulfilment of the requirements of Schedule 1, section 4(2)(a) and section 4 (2)(b) of the Working with Children (Risk Management and Screening) Regulation 2020 and is aligned with the following National Principles for Child Safe Organisations –

- National Principle 2 – Children and Young People are informed about their rights, participate in decisions affecting them and are taken seriously.
- National Principle 4 – Equity is upheld and diverse needs respected in policy and practice

Our Commitment to Parents and Guardians

“A child safe institution observes Article 18 of the UNCRC, which states that parents, carers or significant others with caring responsibilities have the primary responsibility for the upbringing and development of their child. Families and caregivers are engaged with the child safe institution’s practices and are involved in decisions affecting their children. Families and caregivers are recognised as playing an important role in monitoring children’s wellbeing and helping children to disclose any complaints”. “A child safe institution engages with the broader community to better protect the children in its care. Institutions are more likely to foster a child safe culture if the surrounding community values children, respects their rights, and ensures that their rights are fulfilled”.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13, Schools

BBC recognises that collaborative relationships with families and communities are fundamental to achieving quality outcomes for its students and that community partnerships that are based on active communication, consultation and collaboration are also essential. A key area of focus for the College is positive psychology as the framework on which we construct our holistic wellbeing program that is community focused. This initiative is also a key priority in the College’s Strategic Direction 2019-2021 where we will lead, promote and foster the development of wellbeing; enabling all students, staff and our wider community to flourish and thrive.

BBC is committed to facilitating open communication whereby families and the wider BBC community are informed of relevant issues and participate in decisions about the safety of children, including publicising and sharing information with parents and guardians about safeguarding children and young people and where they can go to for assistance if they require further information, advice or would like to raise concerns.

BBC actively promotes collaborative partnerships to ensure families are informed, and involved in promoting child safety and wellbeing through:

- BBC’s Positive Education and Student Wellbeing frameworks
- A Year Level wellbeing structure which includes Mentor, Year Team Leader and Assistant Year Team leader roles for Years 7-12 which provide for greater effectiveness in the delivery of the student wellbeing strategy and philosophy for the College, and which encourages direct communication between Year Team Leaders and parents
- Parent and student surveys (examples include: ACER Social Emotional Wellbeing Survey, VIA Character Strength Survey, Student Pulse Check surveys etc.)
- Parent Positive Education workshops
- New parent information evenings
- Parent breakfast seminars
- Information evenings for parents and community members (examples include: Michael-Carr-Gregg, Steve Biddulph, Dr Suzy Green)
- Positive education and wellbeing resources available to parents via the Parent Portal on Highlands and BBC website



- Relevant policies are published on the BBC website and available through the Parent Portal
- Parents have the opportunity to engage in the College community through the Parents & Friends including the tuckshop, College Shop and Parent Connections and support groups.
- “SchoolTV” available to parents via the BBC website and Highlands
- Brisbane Boys’ College publications (e.g. Newsletters)

This commitment is evidence of the PMSA’s fulfilment of the requirements of Schedule 1, section 4(2)(a) and section 4(2)(b) of the Working with Children (Risk Management and Screening) Regulation 2020 and is aligned with the following National Principles for Child Safe Organisations –

- National Principle 3 – Families and communities are informed, and involved in promoting child safety and wellbeing.

A code of conduct for interacting with children

Institutional culture consists of the collective values and practices that guide the attitudes and behaviour of staff and volunteers. It guides the way things are done and the way issues are managed, dealt with and responded to. A positive, child-focused culture could help to protect children from sexual abuse and facilitate the identification of and proper response to child sexual abuse.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13, Schools

The PMSA Code of Conduct outlines the standards of behaviour expected of all employees, volunteers, and contractors engaged by Brisbane Boys’ College, including providing reference to the policies and procedures that outline the expected standards of behaviour which will assist them to guide relationships with the children and young people in their care. Everyone performing any role at the College is expected to work in a manner consistent with the College’s Christian ethos and values.

Every employee must be aware that their interactions with students are based on a trusting relationship arising from the nature of their work and that those relationships are open to scrutiny. Everyone who performs work at BBC whether in a paid or volunteer capacity, must ensure that their interactions with students are appropriate at all times by making sure that their **intentions**, their **actions** and their **efforts** ensure a child safe environment for all students always, and that all interactions with students has a valid educational purpose.

Employees, volunteers and contractors working at Brisbane Boys’ College **must never**:

- engage in any form of physical, psychological, or emotional abuse of a student
- undertake any work with students prior to meeting their blue card screening obligations
- deliberately undertake any actions or behaviour with the aim of befriending and establishing an emotional connection with a child, to lower the child’s inhibitions in order to sexually abuse the child (i.e. grooming behaviour)
- engage in an intimate and/or romantic and/or sexual relationship with a student
- talk to a student about highly personal and/or sexually inappropriate matters
- do anything that would make people think you are doing something sexual or inappropriate to a student
- touch a student in a sexual way, or engage in any other inappropriate sexual activity
- use communications that are harmful such as making a statement of a sexual nature to a student, or in the presence of a student/s, whether the statement is made verbally or in writing
- direct flirtatious behaviour or intimate gestures towards a student
- express romantic feeling towards a student in written or other form
- plan meetings with the student alone outside of school without a valid context
- take a student alone for an unauthorised outing, e.g. coffee, the movies or other social events
- give gifts or inducements outside of the acceptable professional norms



- exploit their position for financial gain
- manipulate 'alonetime' opportunities with a student
- show preferential treatment to students without legitimate reason
- participate in a social event with a student or students, particularly when the social event is not attended by parents and/or does not involve family or community ties
- allow a student to enter their place of residence if it does not involve family or community ties
- use social media to interact with a student without a valid educational context

Protocols for Interactions with Students

Every BBC employee, volunteer and contractor must ensure they are familiar with the *PMSA Code of Conduct*, *PMSA Professional Relationships with Students Policy*, *Social Media (Personal Use) Policy* and *Gifts and Other Benefits Policy* which provide clear guidelines around the standard of behaviour expected which will promote and encourage professional relationships with students.

BBC protocols for situations involving students include:

Working with Students on an individual basis

As far as possible Brisbane Boys' College employees are required to avoid situations where they are alone in an enclosed space with an individual student. If, in the conduct of his/her professional duties, a member of staff is required to provide one-on-one learning assistance, feedback, assessment or pastoral care to a student on an individual basis it is important that professional boundaries with that student are maintained by:

- Considering whether it is essential to meet with the student one-on-one.
- Ensuring the interaction takes place in an area open to observation and that visibility of occupants is ensured at all times. At BBC sections of the doors into classrooms and other areas of the College where students regularly frequent have been fitted with clear panes of glass to ensure visibility. It is a requirement that window coverings (e.g. curtains and blinds) remain open at all times, unless in the case of an emergency event requiring lockdown.
- Ensuring parents/guardians have been informed about and have given consent for such individual assistance and, having the activity authorised by the HoD and/or Head of sub-school and/or Headmaster.
- Considering the time and venue carefully to avoid placing themselves in a vulnerable situation.
- Providing the support during normal school hours and not conducting excessively long sessions.
- Not locating themselves between the student and the door.
- Ensuring behaviour management issues are carried out in the presence of at least two members of staff.

Physical Environment

A child safe institution designs and adapts its physical environment to minimise opportunities for abuse to occur. The institution finds a balance between visibility and children's privacy and their capacity to engage in creative play and other activities. It consults children about physical environments and what makes them feel safe.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13, Schools

BBC identifies and mitigates the risks in the physical environment without compromising a child's right to privacy and healthy development by:

- ensuring there is effective natural surveillance with few out-of-the-way places, taking into account students' right to privacy
- routine movements of staff (e.g. school sergeant, grounds duty, bus duty) to provide formal and informal line-of-sight supervision
- ensuring all doors have glass inserts or there is visibility provided via another means (i.e. windows)



- surveillance equipment (CCTV) installed in high-risk environments where natural surveillance is not feasible, taking into account students' right to privacy
- engaging security personnel after hours and during school holidays
- comprehensive alarm system
- random checks of obstructed and out-of-the way locations
- controlling physical access to the school grounds via a combination of smart cards, RFID as well as physical keys. All areas within the school have physical IT specific keys or electronic swipe access.
- electronic visitor sign-in systems available at reception points as part of BBC's visitor management procedures.

Use of Technology and Social Media

Child safe institutions address the potential risk posed in an online environment, educating children and adults about how to avoid harm and how to detect signs of online grooming. The institution articulates clear boundaries for online conduct, and monitors and responds to any breaches of these policies.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13, Schools

It is an expectation that the online environment is used by staff, students and parents/guardians in accordance with Brisbane Boys' College's code of conduct and relevant policies.

Protocols for employees, volunteers and contractors

All interactions with students via e-mail, mobile phone or social media, by a BBC employee, volunteer or contractor, are required to be directly related to the educational context and must be professional at all times.

BBC employees, volunteers and contractors must:

- Always use the school's authorised IT systems. Never use personal email or websites to communicate with students.
- Never add a student as a contact or "friend" on social media or engage in online discussions using social media with a student or group of students
- Never use electronic devices, such as email, social networking sites, mobile phones or SMS texting, for the purposes of the distribution of sexually explicit material to a student/s or for solicitation or harassment.
- Never connect with students or interacting with, or posting images of, students on individual private social media forums (for example, employees must not be "friends" with students on Facebook) unless it would be reasonably expected that an employee and a student will appropriately interact within the valid context of a legitimate purpose;
- Never join the social networking sites of students.
- Using professional discretion before accepting ex-students or parents of current students as friends.
- Never engaging in any form of inappropriate activity that may be viewed by students and/or the broader public.

Protocols for students

BBC is committed to providing our students with a safe and secure Information and Technology environment. This is achieved through:

- the College's Student Acceptable Use of Technology Policy which aims to provide students with a clear and concise statement of their responsibilities while using BBC's ICT services and what constitutes acceptable and unacceptable use
- the College's Social Media (Student Usage) Policy
- the monitoring of student accounts and student use of ICT resources and services to maintain a secure ICT environment



- conducting random audits of student machines by the BBC IT Department to check for inappropriate software that may have been installed and which may pose a potential safety/security risk
- audits of students' compliance with their responsibilities under the BBC Student Acceptable Use of Technology Policy
- process for reporting and managing any known or suspected breach of the BBC Student Acceptable Use of Technology Policy

ICT Infrastructure

BBC's Sonicwall Firewall is the College's primary safety mechanism for students and also staff by actively monitoring and disabling access to inappropriate content, for example the Firewall will block a student from accessing inappropriate content on a website or application on a student machine. All user activity outbound to the internet is logged via BBC firewall. Reports can be generated or emails sent regarding unsafe interactions with the internet.

BBC uses Mimecast, an email content filtering service which is attached to BBC email. It will scan any link a student clicks on in an email to check its authenticity and safety (including inappropriate content).

The College uses Office 365 which encompasses OneDrive, Email, and the Office Suite of products and Microsoft has extensive virus scanning and safety mechanisms built into these products.

Transportation of a student/s in a private vehicle

BBC employees should not transport students unless a duty of care obligation needs to be met, at which time the staff member must:

- Attempt to seek permission from the parent/guardian **prior** to the journey commencing, where possible.
- Have the student sit in the rear of the vehicle.
- Take the most direct route to the destination and ensure there are no significant delays or deviations in the journey.
- Advise their direct supervisor as soon as reasonably possible that they will be transporting the student.

Volunteers

Brisbane Boys' College recognises the commitment and enthusiastic support we receive from our parents and volunteers who generously donate their time and energy to support our boys, our staff and our College. However, the College also recognises that there may be risks associated with volunteers entering the College. In the interests of ensuring the safety and wellbeing of our students, BBC has an on-boarding process all volunteers are required to complete prior to commencing volunteer duties with the College. As the first step in this process, all volunteers, including those in restricted employment are required to complete the Volunteer Registration form via the BBC website at: <https://www.bbc.qld.edu.au/community/volunteers/>, and acknowledge that they have read, understood and accept the information provided in the BBC Safeguarding and Standards of Behaviour for Volunteers document. All volunteers to BBC are required to sign in via the electronic sign-in systems which are available at all Reception points, the BBC Facilities Department, Tuckshop and Boarding House. The sign in system includes a comprehensive child protection induction, including a mandatory 'Restricted Person' declaration to be completed by volunteers working at the College in restricted employment.

External contractors and visitors

Brisbane Boys' College recognises that there may be risks associated with external contractors entering the College, for construction projects and other services. All contractors and visitors to BBC are required to sign in via the electronic sign-in systems which are available at all Reception points and the BBC Facilities Department. The sign in system includes a comprehensive child protection induction.



Protocols for contractors when working on campus include:

- Avoiding contact with students at all times
- Never being in contact with students without school staff supervision
- Never using student facilities (e.g. toilets)
- Wearing appropriate clothing at all times
- Staying within an agreed working area and access routes
- Reporting immediately to a BBC staff member should they be approached by a student for any reason
- Never using profane or inappropriate language when students are present
- Never communicating with students via electronic communication, including via social media sites, email, mobile phone or SMS texting
- Complying with the laws which ban smoking in all Queensland schools, and for 5 metres beyond their boundaries

Contractors and their employees who are on site under a written service agreement are required to hold a valid blue card as part of their contractual arrangement prior to carrying out any work at the College.

Photography

BBC has in place a policy for the use of key messages and images featuring children and will ensure, in respect of photographs of students that:

- The permission of the parent or guardian of the child has been obtained including specification by the parent and child as to how the image will be used; **and**
- When obtaining consent to use an image the child's confidentiality is maintained and the child is not put at risk or the child's best interest compromised.

Family/Community Connections with Students

Brisbane Boys' College acknowledges that employees working or volunteering at the College, may also have children attending the College and may face additional challenges in managing professional boundaries as they are more likely to have social relationships with the students and their families with whom they work and will have legitimate reasons, on occasions, to be visited at their home by these students. These social engagements are an important part of being involved in the school community and employees are encouraged to enjoy these social engagements without concern of compromising their professional responsibilities. The guiding principles in managing these situations are:

- social contact should be generated via the relationship the employee has with the parents of the student/s or by an event (such as a sporting event)
- employees should avoid being alone with a student in these situations.
- employees should conduct themselves in a way that will not give others reason to question their suitability to work with children and young people and that will not create discomfort for students in their learning relationship with them. For example, consuming alcohol in these situations may lessen an employee's capacity to judge when a professional boundary is at risk.
- an employee should politely refuse to discuss matters relating to the workplace and should not discuss student's learning or social progress other than at times specifically set aside for that purpose.
- any concern an employee has about whether or not a situation may be compromising or breaches a professional relationship should be discussed with their immediate line manager.

Physical Contact

BBC employees must be conscious that their actions, particularly physical gestures, are open to scrutiny by others and are required to develop and exercise prudent judgement and sensitivity regarding appropriate physical interactions with students.



Confidentiality of information

The BBC Privacy Policy provides clear guidelines for staff in relation to how they are expected to manage confidential information about children and young people, including in relation to:

- how information is collected, stored and who has access to it
- processes for reporting data breaches or suspected data breaches

Professional Boundaries: A Guideline for Queensland Teachers

Every BBC employee is encouraged to familiarise themselves with the Professional Boundaries: A Guideline for Queensland Teachers released by the Queensland College of Teachers (QCT). Whilst the Guideline is designed to assist teachers in establishing and maintaining appropriate professional boundaries with students, and to consider the implications and potential consequences of engaging in certain behaviours with students, it can provide guidance to all BBC staff (both Academic and Corporate) in their response to certain situations to ensure their conduct meets the standard of behaviour expected of them in their relationships with students. The Guideline can be accessed from the QCT website.

This commitment is evidence of the PMSA's fulfilment of the requirements of Schedule 1, section 4(2)(a) and section 4 (2)(b) of the Working with Children (Risk Management and Screening) Regulation 2020 and is aligned with the following National Principles for Child Safe Organisations –

- National Principle 1 – Child safety and wellbeing is embedded in organisational leadership, governance and culture
- National Principle 8 – Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed

CAPABILITY

Written procedures for recruiting, selecting, training and managing staff and volunteers.

Child-focused human resource practices help screen out people unsuitable for working with children or discourage their application. Such practices make sure child safety is prioritised in advertising, recruiting, employment screening, and selecting and managing staff and volunteers. During induction processes, all staff and volunteers should be given clear conduct and behavioural guidelines, such as a code of conduct. Child safe institutions recognise that Working with Children Checks can detect only a subset of people who are unsuitable to work with children, and that these checks should be part of a suite of screening practices.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13, Schools

Brisbane Boys' College recognises that human resources management in a child safe institution, through screening, recruitment and ongoing performance review, plays an important role in protecting children from harm by deterring and identifying applicants that are not suitable to work for the College, assisting to find the people that are qualified and who will contribute to facilitating a safe and supportive environment for children, ensuring that staff receive appropriate induction and training and are aware of their child safety responsibilities, including reporting obligations and can deliver child-related services in a safe and productive way, and ensuring that any issues with staff performance or conduct are identified early and actioned appropriately.

Brisbane Boys' College considers the core components of human resources management in a child safe institution to be the following:

- Recruitment, including advertising and screening with an emphasis on child safety
- Relevant staff and volunteers have Working with Children Checks, including mandatory Restricted Person



declaration for those persons working at the College in 'restricted employment' (i.e. volunteer parents of current students, volunteers who are under 18 and paid or unpaid members of staff who work in regulated child-related employment for not more than 7 days in a calendar year)

- All staff and volunteers receive an appropriate induction and are aware of their child safety responsibilities, including reporting obligations
- Supervision and people management have a child safety focus

Recruitment, including advertising and screening, emphasis on child safety

The processes adopted when employing new staff at Brisbane Boys' College include child safe processes embedded in the following:

1. Pre-Appointment
 - Recruitment
 - Position Descriptions
 - Selection Criteria
 - Advertising the position
2. Selection
 - Interview Process
 - Referee Checks
 - Probationary period of employment
 - Employment contracts signed by the employee and the Headmaster prior to commencement
3. Post-Appointment
 - Training
 - Induction program
 - Ongoing staff management
 - Blue card or exemption details maintained as accurate on the BBC Blue Card Register at all times
 - Exit Interview or questionnaire

Recruitment of Volunteers and Contractors

Volunteers

Any person applying to work in a voluntary capacity at BBC must first complete the Volunteer Registration form via the BBC website at: <https://www.bbc.qld.edu.au/community/volunteers/>, and acknowledge that they have read, understood and accept the information provided in the BBC Safeguarding and Standards of Behaviour for Volunteers document. The Volunteering Registration form also includes a mandatory 'Restricted Person' declaration to be completed by any volunteers who will be working at BBC in restricted employment. Completion of the form does not constitute permission to commence and the individual will receive further onboarding information from the relevant supervising BBC staff member prior to being granted permission to begin volunteering at BBC.

Restricted employment at BBC refers to the following situations or exemptions that allow a person to work with children without a blue card:

- a volunteer parent of a current BBC student
- a volunteer who is under 18
- an unpaid member of staff who works in regulated employment for not more than 7 days* in a calendar year

*Where a 'day' includes a full day or part of a day (e.g. 2 hours of work on 1 day is considered to be a day). A 'calendar year' covers the period from 1 January to 31 December.



All volunteers who are not working at BBC in 'restricted employment', for example grandparents are required to hold a valid Blue Card **prior** to commencing work at the College. To be permitted to continue working at the College an individual working at BBC in a volunteer capacity must submit their application to renew their Blue Card before their current card expires.

All volunteers to BBC are required to sign in on arrival and sign out on departure from the College via one of the electronic sign-in systems which are available at all Reception points, the BBC Facilities Department, Tuckshop and Boarding House. The sign in system includes a comprehensive child protection induction, including a mandatory 'Restricted Person' declaration to be completed by volunteers working at the College in restricted employment. The sign in system includes a comprehensive child protection induction. Volunteers must wear their identification (generated through the electronic sign-in system) at all times and are closely supervised by a member of staff during their time at the College.

The engagement of all volunteers must be approved by the Head of the relevant sub-school/Department prior to the individual commencing volunteer work at the College.

Contractors

All contractors are required to sign in on arrival and sign out on departure from the College using one of the electronic sign-in systems which are available at all Reception points, the BBC Facilities Department, Tuckshop and Boarding House. The sign in system includes a comprehensive child protection induction and contractors must adhere to the protocols for interactions with students outlined on Page 15 of this Risk Management Strategy.

Contractors must wear their identification (generated through the electronic sign-in system) at all times and are closely supervised by a member of staff during their time at the College.

Contractors and their employees who are on site under a written service agreement with the College are required to hold a valid blue card as part of their contractual arrangement prior to carrying out any work at the College.

Visitors

All visitors are required to sign in on arrival and sign out on departure from the College using one of the electronic sign-in systems which are available at all Reception points, the BBC Facilities Department, Tuckshop and Boarding House. All visitors must wear their visitor identification (generated through the electronic sign-in system) at all times. The sign-in system includes a comprehensive child protection induction. Visitors are closely supervised at all times and must adhere to the protocols for interactions with students outlined on Page 15 of this Risk Management Strategy.

Directors of non-State school governing bodies

Under Schedule 1, part 2, section 25 of the *Working with Children (Risk Management and Screening) Act 2000*, directors of non-State school governing bodies are taken to be persons carrying on a regulated business. All directors of the Brisbane Boys' College School Council are required to hold a working with children card (Blue Card) before they can commence in their position as a member of the BBC School Council. Otherwise the governing body is not suitable to be, or to continue to be, a school's governing body under section 26(3) of the *Education (Accreditation of Non-State Schools) Act 2017*. As long as a person submits their renewal application before their current card expires, they can continue carrying on a regulated business even if the new card has not been issued by the time the previous card expires.



Relevant staff and volunteers have Working with Children Checks

Under the *Working with Children (Risk Management and Screening) Act 2000* blue card screening requirements do not apply to every environment a child may be present. The blue card system is structured so that organisations providing services which are essential to children's development and wellbeing, such as childcare, education, sport, and cultural activities are captured. **BBC acknowledges that it cannot make it a compulsory requirement for individuals to hold a Blue Card unless they are providing child-related services that are regulated by the Act**

Teaching Staff

All teachers employed at Brisbane Boys' College must be registered with the Queensland College of Teachers. Original certificates of registration and qualifications are sighted upon employment and copies are stored in the teacher's personnel file.

Non-Teaching Staff, including volunteers

All non-teaching staff and volunteers, who are not working or volunteering at BBC in restricted employment must hold and continue to hold a Blue Card issued by Blue Card Services, in accordance with the *Working with Children (Risk Management and Screening) Act 2000*, unless an exemption applies under the Act.

A person working at BBC in restricted employment must complete a mandatory 'Restricted Person' declaration to commence or continue to work at BBC in restricted employment.

Restricted employment at BBC refers to the following situations or exemptions that allow a person to work with children without a blue card:

- a volunteer parent of a current BBC student
- a volunteer who is under 18
- paid or unpaid member of staff who works in regulated employment for not more than 7 days* in a calendar year

*Where a 'day' includes a full day or part of a day (e.g. 2 hours of work on 1 day is considered to be a day). A 'calendar year' covers the period from 1 January to 31 December.

A person who is required to hold a blue card cannot commence working or volunteering at BBC until their Blue Card has been validated, the identity of the individual verified, and a link between the blue card holder and Brisbane Boys' College has been created Brisbane Boys' College (where relevant).

Brisbane Boys' College Blue Card Register

Under the *Working with Children (Risk Management and Screening) Act 2000*, Brisbane Boys' College maintains an employee register of all paid employees and volunteers, including those who are not required to hold a Blue Card (e.g. teachers, health practitioners and individuals working at BBC in restricted employment) under the Act which includes:

- the person's full name and date of birth (if available)
- employment type
- whether or not the person requires a Blue Card (if not, why not – e.g. a registered teacher or a restricted employment exemption applies)
- the type of card (e.g. paid or volunteer)
- the date of the working with children authority
- the expiry date of the working with children card (Blue Card)
- the date the blue card has been validated (where applicable)



- the date the blue card holder was been linked to BBC (where applicable)
- whether a negative notice has been issued
- any change in status to a Blue Card (e.g. a change in police information, the Blue Card is cancelled or suspended)
- where there is a change in Police information, the date of receipt of information of the change
- when a Blue Card holder leaves the organisation and the date the organisation informs Blue Card Services, and
- any change of personal information of a Blue Card holder, including the date they informed Blue Card Services (Note: it is an offence for an employee to fail to notify Blue Card Services, on the appropriate form, within 14 days, of any changes in personal details).

Induction, Training and Professional Development

“A child safe institution promotes and provides regular ongoing development opportunities for its staff and volunteers through education and training, beginning with induction. Child safe institutions are ‘learning institutions’, where staff and volunteers at all levels are continually building their ability and capacity to protect children from harm”.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13,

Brisbane Boys’ College has a written induction process for all employees during the first twelve months of appointment to equip them with the knowledge, skills and awareness to keep the children and young people in their care safe through continual education and training.

BBC employees and volunteers are well-informed about their roles and responsibilities, reporting and privacy obligations and relevant legislation and policy obligations, in accordance with requirements outlined by the *Working with Children (Risk Management and Screening) Act 2000 (Qld)* and BBC and PMSA policies and procedures as they relate to child protection. Employees and volunteers receive induction, training and ongoing professional development to assist them to fully understand their role with respect to reducing child protection risks, including responsibilities and procedures for handling and reporting disclosures or suspicions of harm. This is achieved through:

- mandatory online ISQ Child Protection - Schools training module,
- mandatory online BBC Child Protection - A Safe Place for Children to Learn & Grow online training,
- mandatory online BBC Induction Program for Casual Employees, Volunteers and Contractors,
- mandatory online PMSA Code of Conduct training and Policy,
- new staff orientation programs (BBC and PMSA)
- this Child and Youth Risk Management Strategy.

PMSA New Staff Orientation Day

Child protection Information as it relates specifically to PMSA schools is provided to all new BBC employees at the PMSA New Staff Orientation Day, held in January of each year. This session covers people, culture, awareness, training, working with children screening (Blue Cards), PMSA specific initiatives in child protection, and where to find information about child protection on the PMSA staff portal.

As part of the PMSA’s commitment to child protection risk management, attendance at this Orientation Day is mandatory for all new employees.



BBC New Staff Orientation

A session on Child Protection and safeguarding is included in the Brisbane Boys' College orientation program delivered by the College to all new staff in January each year, prior to the commencement of the first school term. This session provides new employees of BBC with information relating to:

- BBC's commitment to learning environments that are safe and supportive for children and young people
- established protocols and standards of behaviour for employees to ensure that their behaviour towards, and relationships with, children and young people reflect appropriate standards of care
- directing all new employees to BBC and PMSA policies and procedures as they relate to child protection
- procedures to follow when a disclosure of harm is received
- reporting guidelines in relation to disclosures of harm and suspicions of harm
- employees' rights and responsibilities, as well as those of children and young people
- what to expect if there is an allegation of harm made against them or to them
- the roles of key people at BBC specifically relating to child protection
- complaints procedures.

BBC Child Protection – A Safe Place for Children to Learn and Grow online training module

The BBC Child Protection – A Safe Place for Children to Learn and Grow online training module ensures BBC's compliance with the requirements under the PMSA Blue Card (Working with Children) Policy which requires that:

- Each PMSA Facility will include in their induction procedure for new employees an explanation of the PMSA policies and the facility's policies related to child protection.
- Each PMSA school will run a refreshing explanation of the PMSA policies and the facility's policies related to child protection for all employees once every year.

This training module forms part of the broader BBC online training program which is delivered to staff on an annual basis. It has also been designed to complement the information delivered in the ISQ online Child Protection – Schools training module as described below.

Independent Schools Queensland (ISQ) online Child Protection - Schools training module

All BBC staff employed on a full time or part-time basis are required to complete the Independent Schools Queensland (ISQ) online Child Protection - Schools training within one week of commencing work at the College and then annually as a condition of employment. This training is delivered to BBC employees via the ISQ Connect&Learn training platform. The aim of this training is to ensure that all employees fully understand their role and responsibilities in recognising and reporting harm and suspicions of harm, sexual abuse, likely sexual abuse and other forms of harm.

Child Protection training for casual employees, volunteers and contractors

Brisbane Boys' College also delivers mandatory online induction training to casual staff, volunteers and contractors. The aim of this training is to provide all individuals who work at BBC on a casual, voluntary or contract basis with information about recognising harm, including the types of child abuse that can cause harm, recognising possible indicators that a child has suffered, is suffering or is at an unacceptable risk of suffering harm, standards of acceptable behaviour in their professional relationships with students, including protocols to ensure that their behaviour towards, and relationships with children and young people reflect appropriate standards of care, their working with children (blue card) obligations, their role and responsibilities in reporting harm, suspicions of harm, sexual abuse, likely sexual abuse or any other form of harm to a child and the BBC and PMSA policies and procedures as they relate to child protection.



Professional Development

BBC also provides on-going professional development and in-service training and education to employees in relation to blue card management and compliance, student behaviour management, anti-bullying, risk management of high risk activities and special events, disability standards, including a mandatory requirement that all academic staff must complete the Independent Schools Queensland Disability Standards for Education online training module.

As a condition of employment, it is a requirement that all staff complete the required mandatory training, both in the first instance and annually thereafter, within one week of commencing employment, preferably within the staff professional development days of each new year.

This commitment is evidence of the PMSA’s fulfilment of the requirements of Schedule 1, section 4(3) of the Working with Children (Risk Management and Screening) Regulation 2020 and is aligned with the following

National Principles for Child Safe Organisations –

- National Principle 5 - People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice **and**
- National Principle 7 - Staff are equipped with the knowledge, skills and awareness to keep children and young people safe through continual education and training

CONCERNS

A child-focused complaints process is an important strategy for helping children and others in institutions to make complaints. Child safe institutions respond to complaints by immediately protecting children at risk and addressing complaints promptly, thoroughly and fairly.

A child safe institution has clear and detailed policies and procedures about how to respond to complaints. Staff and volunteers understand their responsibility for making a complaint promptly if they become aware of concerning behaviours, as well as their reporting obligations to external authorities.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13

Handling Disclosures or Suspicions of Harm, including, reporting guidelines

BBC is committed to embedding children’s rights, safety and wellbeing into our procedures for reporting and responding to disclosures of harm or suspicions of harm involving children and young people, and ensuring that children and young people, staff, volunteers, parents and carers feel supported in making a complaint to the College.

It is very important that anyone involved with the BBC community does not delay reporting any harm or suspicion of harm to a child or young person because they may be unsure of their obligations under the relevant legislation. The most immediate obligation any individual has on becoming aware that a child has suffered, is suffering, or is at risk of suffering harm is to **REPORT** it to the Headmaster so that immediate steps can be taken to ensure the child is safe.

The Headmaster will ensure any additional reporting requirements, including conferring with relevant staff with respect to any additional mandatory reporting requirements, are attended to at that time of reporting. Any disclosure or suspicion of harm will be acted on as required by legislation. This may include reporting to the



Queensland Police Service and/or Child Safety Services. Where appropriate, referrals may be made to community based services, for example the Department of Communities Family and Child Connect Services.

Defining Harm

Harm is defined as ‘any detrimental effect of a **significant nature** on the child’s physical, psychological or emotional wellbeing’. Harm can be caused by physical, psychological, or emotional abuse or neglect; or sexual abuse or exploitation (section 9 of the *Child Protection Act 1999*).

Considerations when forming a reasonable suspicion about harm to a child include:

- whether there are detrimental effects on the child’s body or the psychological state or emotional state
 - that are evident to the person, or
 - that the person considers are likely to become evident in the future, and
- in relation to any detrimental effects mentioned above
 - their nature and severity, and
 - the likelihood that they will continue, and
- the child’s age (section 13C of the *Child Protection Act 1999*).

It is also important to remember that harm can be caused by a single act or omission or a series of acts or omissions.

Types of abuse and resulting harm

Listed below are the types of abuse and resulting harm that may be experienced by children and young people; however, this is not a complete list and is intended to be used as a predictive tool for potential signs of harm. Each child’s experience is different and depends on a range of factors, including the child or young person’s age, the nature of harm, how long the abuse has been occurring, their relationship to the abuser, and their support networks.

TYPES OF ABUSE <i>Actions/behaviours by perpetrator</i>	RESULTING HARM <i>Impact experienced by the child</i>
<p style="text-align: center;">Physical abuse</p> <ul style="list-style-type: none"> • Hitting • Shaking • Burning/scalding • Biting • Causing bruise or fractures by excessive discipline • Poisoning • Giving children alcohol, illegal drugs or inappropriate medication • Domestic and family violence 	<p style="text-align: center;">Physical <i>Refers to the body</i></p> <ul style="list-style-type: none"> • Bruising • Fractures • Internal injuries • Burns
<p style="text-align: center;">Psychological or Emotional abuse</p> <ul style="list-style-type: none"> • Scapegoating • Persistent rejection or hostility • Constant yelling, insults or criticism • Cultural affronts • Teasing/bullying/cyberbullying • Domestic and family violence 	<p style="text-align: center;">Psychological <i>Refers to the mind and cognitive processes</i></p> <ul style="list-style-type: none"> • Learning and developmental delays • Impaired self-image
<p style="text-align: center;">Neglect</p> <ul style="list-style-type: none"> • Not giving a child sufficient food, housing, clothing, enough sleep, hygienic living conditions, health care and adequate supervision • Leaving children unattended • Children missing school 	<p style="text-align: center;">Emotional <i>Refers to the ability to express emotions</i></p> <ul style="list-style-type: none"> • Depression • Hypervigilance • Poor self esteem • Self harm • Fear/anxiety
<p style="text-align: center;">Sexual abuse or exploitation</p> <ul style="list-style-type: none"> • Kissing or holding a child in a sexual manner • Exposing a sexual body part to a child • Exposing children to sexual acts or pornography • Making obscene phone calls or remarks to a child • Having sexual relations with a child or young person under 16 years of age 	



Signs to help identify if harm is occurring

Is important that everyone who performs work at Brisbane Boys' College is alert to, and can recognise the behavioural, emotional and/or physical signs children who have been harmed or are at risk of being harmed may show.

Observing any of these behaviours in a child may be sufficient grounds for suspicion of harm even if no actual disclosure has been made.

However, it is important to remember that some children may show no signs at all that he or she has suffered, is suffering, or is at unacceptable risk of suffering harm.

General indicators of child abuse

Some general indicators of child abuse include:

- showing wariness and distrust of adults
- rocking, sucking or biting excessively
- bedwetting or soiling
- demanding or aggressive behaviour
- sleeping difficulties, often being tired and falling asleep
- low self-esteem
- difficulty relating to adults and peers
- abusing alcohol or drugs
- being seemingly accident prone
- having broken bones or unexplained bruising, burns or welts in different stages of healing
- being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable
- feeling suicidal or attempting suicide
- having difficulty concentrating
- being withdrawn or overly obedient
- being reluctant to go home
- creating stories, poems or artwork about abuse.

General Indicators of Neglect

Some indicators of neglect include:

- malnutrition, begging, stealing or hoarding food
- poor hygiene, matted hair, dirty skin or body odour
- unattended physical or medical problems
- comments from a child that no one is home to provide care
- being constantly tired
- frequent lateness or absence from school
- inappropriate clothing, especially inadequate clothing in winter
- frequent illness, infections or sores
- being left unsupervised for long periods.



Managing and recording a disclosure or suspicion of harm

Important things to consider about how to manage a disclosure of harm

- remain calm and listen attentively, actively and non-judgementally
- ensure there is a private place to talk
- encourage the person to talk in their own words and ensure just enough open-ended questions are asked to act protectively (e.g. 'Can you tell me what happened'...or 'Can you tell me more about that'). Don't ask leading questions which tend to suggest an answer. Ensure the person is advised that the disclosure cannot remain a secret and it is necessary to tell someone in order to get help
- reassure the person they have done the right thing by telling you
- advise the child that you need to tell someone else who can help the child
- document the disclosure clearly and accurately, including a detailed description of:
 - the relevant dates, times, locations and who was present
 - exactly what the person disclosing said, using "I said," "they said," statements
 - the questions you asked
 - any comments you made, and
 - your actions following the disclosure
- not attempt to investigate or mediate an outcome, and
- follow any relevant process for reporting a disclosure of harm and consider whether there are requirements to report matters to the Queensland Police Service or Child Safety.

Suspicion of harm (or other concern for a child or young person's welfare)

In relation to a 'suspicion' of harm, all employees should:

- remain alert to any warning signs or indicators
- pay close attention to changes in the child's behaviour, ideas, feelings and the words they use
- make written notes of observations in a non-judgemental and accurate manner
- assure a child that they can come to talk when they need to, and listen to them and believe them when they do, and
- follow any relevant process for reporting a suspicion of harm and consider whether there are requirements to report matters to the Queensland Police Service or Child Safety, or consider what support services could be offered to the family if the concern does not meet the relevant threshold to make a report.

The BBC Child Protection Reporting Form 2020 is available under Staff Services < Staff Documents on Highlands.

Reporting a disclosure or suspicion of harm

BBC recognises that everyone who works at the College has multiple legislative obligations in respect of reporting harm or suspicions of harm to a child with certain employees such as teachers and school nurses having additional mandatory reporting requirements under the *Child Protection Act 1999* for reporting physical and sexual abuse. This includes the reporting of sexual abuse, or likely sexual abuse, immediately to the Headmaster or a director of the school's governing body who must then immediately report the matter to Police (under the *Education (General Provisions Act) 2006*). Reports of physical abuse under both the *Child Protection Act 1999* and the *Education (Accreditation of Non-State Schools) Regulation 2017* must be made through the Headmaster to Child Safety. Mandatory reporters at BBC, where appropriate, must confer with the Headmaster in preparing a written report under the *Child Protection Act 1999*.



An employee, volunteer, contractor or a member of the Brisbane Boys' College community **MUST** report to the Headmaster regardless of how many details they have or whether they think the information they have is trivial, if:

- a child or young person reports that they have been harmed
- someone else, for example another child, a parent, or a staff member, reports that harm has occurred or is likely to occur
- a child or young person reports that they know of someone who has been harmed (it is possible that they may be referring themselves)
- significant changes in the behaviour of a child or young person, or the presence of new unexplained and suspicious injuries are a concern
- the harm is observed happening
- they have a suspicion a child has suffered, is suffering, or is at unacceptable risk of suffering, because of the child's physical or behavioural indicators
- the individual is a teacher or school nurse, and has formed a reasonable suspicion that the child has suffered, is suffering, or is at unacceptable risk of suffering, 'significant harm' caused by physical or sexual abuse in the context of, the nature and severity of any physical or emotional symptoms of harm in the child, and the individual believes these to be detrimental to the child, the likelihood the effects will continue and the child's age ('Significant Harm Test'), **and** they have reasonable suspicion that the child may not have a parent willing and able to protect them ('Parent Test'). Please note that in this instance the individual is not required to make an investigation or determination as to whether a parent is willing and able, "reasonably suspecting" that a child may not have a parent willing or able to protect them is sufficient.

A 'Summary of Reporting Harm' can be found in Appendix 1 of the PMSA Child Protection Policy.

Reporting to QCT

Should the Headmaster have cause to investigate an allegation of harm caused, or likely to be caused to a child because of the conduct of a teacher, the Headmaster must as soon as practicable after the investigation starts, inform Queensland College of Teachers (QCT) of the investigation.

Complaint handling process and system

Brisbane Boys' College's complaint handling process and system has been developed to prioritise child safety and promote the rights of children and young people to have a voice in decisions that affect them, including:

1. Ensuring that all children and young people, staff, volunteers, parents and carers are supported in making a complaint to Brisbane Boys' College.
2. Clearly articulating the roles and responsibilities of staff and volunteers to ensure they are aware of their obligations to report and take action to protect the safety of children and young people in their care.
3. Sharing information and communicating with stakeholders to promote the safety and wellbeing of children and young people and ensuring staff and volunteers are aware of what information they can share, with whom, and when and how it should be communicated.
4. Ensuring that the College maintains confidentiality and protects the personal information and privacy of children and young people under the relevant legislation.
5. Monitoring and reassessing risks throughout any investigation and complaints process to prevent risks from reoccurring.
6. Ensuring that all complaints affecting children and young people are properly investigated, taken seriously, and their rights are safeguarded throughout the investigation process and ensuring any investigations are planned, fair, proportionate and thorough, with findings supported by the available evidence.

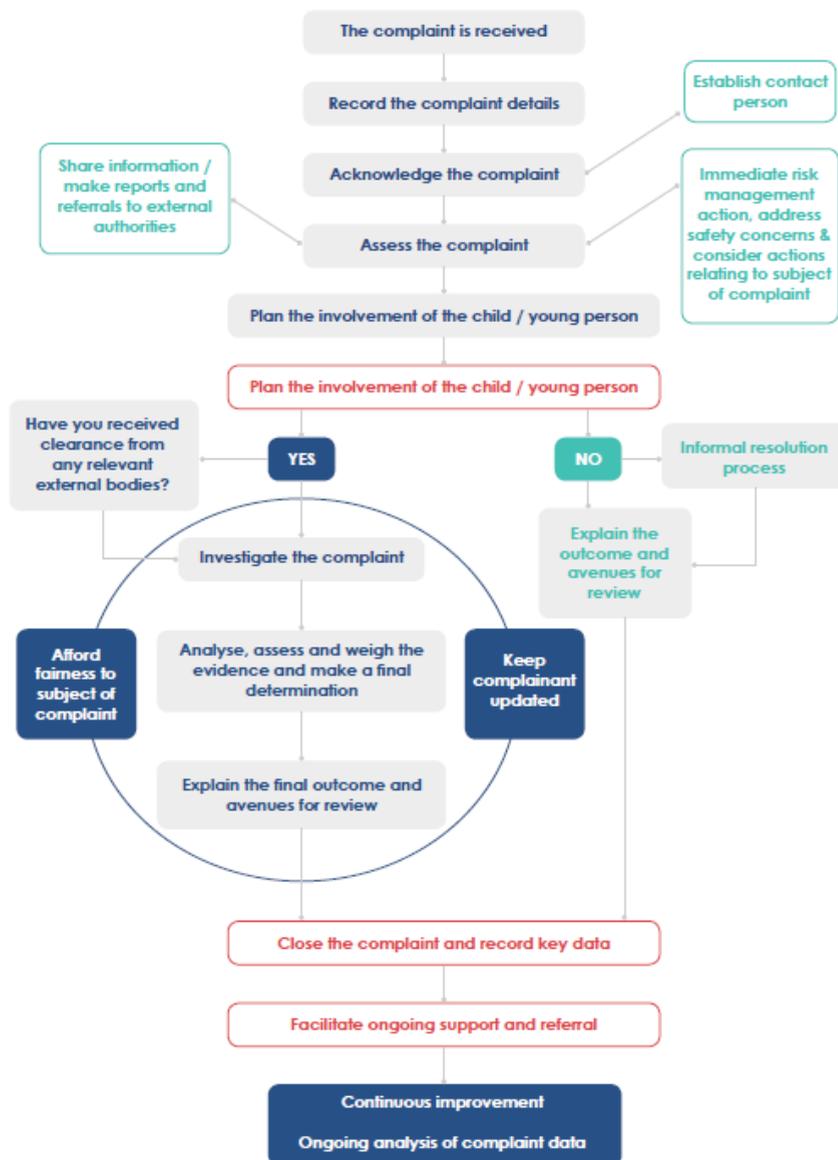


7. Ensuring the complaints process is fair to all parties involved, including affected children or young people and the subject of the complaint, and that an adult's opinion is not prioritised over a child's in the event that they differ; children and young people are listened to without judgement and their views are taken seriously.
8. Being aware of what type of outcomes are available for different complaints and explain them to complainants, including children and young people. Final outcomes of a complaint, their reasons and options for review are also be clearly explained to the complainant and subject of the complaint.
9. Keeping full and accurate records about complaints involving children and young people, in line with any legislative or other record-keeping requirements and analysing these records to make improvements in the processes and identify trends and risks as they relate to child protection.

General process for responding to disclosures of harm or suspicions of harm involving children and young people at Brisbane Boys' College².

Complaint Handling:

Upholding the rights of children and young people (an overview)





This commitment is evidence of the PMSA’s fulfilment of the requirements of Schedule 1, section 4(4) of the Working with Children (Risk Management and Screening) Regulation 2020 and is aligned with the following National Principles for Child Safe Organisations –

- National Principle 6 – Processes to respond to complaints and concerns are child focused

A plan for managing breaches of the risk management strategy

Brisbane Boys’ College will manage any potential breaches of this risk management strategy in a fair and supportive manner to ensure that:

- Everyone is clear on their obligations and rights in relation to reporting breaches.
- There are clear and appropriate consequences that are applied objectively and consistently and in line with a clear course of action
- There is confidence in the risk management strategy

Responsibilities

The eight mandatory requirement areas of the Child and Youth Risk Management Strategy have been utilised to determine the following key roles and their respective areas of responsibility within the College.

Area of Responsibility within the Child and Youth Risk Management Strategy	Delegated Responsibility
Statement of Commitment to the safety and wellbeing of children and protecting children from harm	Headmaster/ Deputy Headmaster - Head of Senior School and Student Wellbeing
Code of Conduct	Headmaster/Deputy Headmaster – Head of Senior School and Student Wellbeing and HR Manager
Policies and procedures for recruiting, selecting, training and managing persons employed or otherwise engaged, by Brisbane Boys’ College, to the extent the policies and procedures reflect the commitment to the safety and wellbeing of children and protecting children from harm	Deputy Headmaster - College Operations & Special Projects P-12 and HR Manager
Policies and Procedures for handling disclosures or suspicions of harm to children, including reporting guidelines	Headmaster / Deputy Headmaster - Head of Senior School and Student Wellbeing
Plans and procedures for managing contraventions of the risk management strategy	Headmaster/ Deputy Headmaster - Head of Senior School and Student Wellbeing and HR Manager
Policies and procedures for complying with Chapters 7 and 8 of the Act, including policies and procedures about implementing and reviewing the risk management strategy, and keeping a written record about matters under chapters 7 & 8 of the Act.	Head of Business Operations
Plans for managing the risks associated with high risk activities and special events	Deputy Headmaster - Head of Senior School and Student Wellbeing and Health and Safety Risk Manager
Strategies for providing communication and support for implementing the risk management strategy, including written information and training materials	Deputy Headmaster - Head of Senior School and Student Wellbeing Director of Positive Education and Wellbeing Director of Marketing and Communications



Breaches of the Child and Youth Risk Management Strategy

Any breaches of the Child and Youth Risk Management Strategy should be reported as soon as practicable. Reports should be made in writing and provide as much detail as possible about the Breach.

This commitment is evidence of the PMSA's fulfilment of the requirements of Schedule 1, section 4(5) of the Working with Children (Risk Management and Screening) Regulation 2020.

Risk Management Plans for High Risk Activities and Special Events

Brisbane Boys' College recognises that forward planning to identify risks and implement strategies can assist to reduce the possibility of children being harmed and that it is important to recognise that in order for a child to suffer harm, there must be an opportunity for harm to arise. These opportunities can be reduced by identifying and mitigating the potential risks of harm to students.

BBC requires risk management plans to be developed to remove or minimise the risk of harm to students for all medium or higher risk activities undertaken on-campus and all activities undertaken outside of the College including:

- All curriculum and co-curricular overnight camps, including residential sports camps (intrastate and interstate)
- All curriculum and co-curricular international tours
- All Community Service Projects (for example annual Year 10 Country Community Services; bi-annual Harvest Cambodia; Red Earth Immersion)
- All activities which require BBC students to be accommodated in a billeting arrangement (for example interstate or overseas sporting trips or language curriculum trips)
- All off-campus excursions held during, and outside school hours.
- Special events conducted on campus and outside school hours (e.g. music concerts, open evenings etc)

In developing a risk management plan staff are required to consider the following, where relevant:

- Accommodation arrangements
- Transport arrangements
- Ratios of Adults to students
- Blue card screening obligations of all staff, volunteers and external providers
 - BBC requires all staff to hold a valid Blue Card unless an exemption applies (e.g. registered teachers)
 - BBC requires all volunteers to hold a valid Blue Card or if a volunteer parent of a current BBC student to have their name recorded on the BBC Blue Card Register
 - BBC requires that all external providers hold valid Blue Cards and the details of the Blue Card have been provided to the College and are entered on the College's Blue Card Register
- Supervision of students (including night supervision where relevant)
- Supervision of volunteers (see also Blue Card screening obligations above)
- Involvement of external providers (see also Blue Card screening obligations above)
- Procedures applying to visitors
- A policy in relation to photographs
- Risks presented by the physical environment and/or location of the activity
- Communication strategies
- Emergency response planning including practical and detailed steps for dealing with emergencies,



as well as the means of ready communication with emergency services.

- Managing medications and allergies
- Managing illness/injury
- Emergency/lockdown procedures
- Information to be provided to parents/guardians for their consent, including emergency contact details

The BBC Risk Assessment Template below is available under Staff Services < Staff Documents in Highlands.

Risk Assessment- Name of Excursion/Camp/Tour																																										
<p><i>Description and location of activity/excursion/camp/tour:</i></p> <p><i>Other Location/s:</i></p> <p>Type of Activity:</p> <p>Aim of Activity:</p> <p><i>Date of activity/excursion/camp/tour:</i></p> <p>Purpose of Risk Assessment:</p>	<p><i>Number in group/class:</i></p> <p><i>Name of activity/excursion/camp/tour coordinator:</i></p> <p><i>Contact number:</i></p> <p><i>Accompanying staff, parents, caregivers, volunteers:</i></p> <p><i>Transportation details:</i></p> <p>Risk Matrix</p> <table border="1"> <thead> <tr> <th rowspan="2">Likelihood</th> <th colspan="5">Consequences</th> </tr> <tr> <th>Critical</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> <th>Insignificant</th> </tr> </thead> <tbody> <tr> <td>Almost Certain</td> <td>Extreme</td> <td>Extreme</td> <td>High</td> <td>Medium</td> <td>Medium</td> </tr> <tr> <td>Likely</td> <td>Extreme</td> <td>High</td> <td>High</td> <td>Medium</td> <td>Low</td> </tr> <tr> <td>Possible</td> <td>High</td> <td>High</td> <td>Medium</td> <td>Medium</td> <td>Low</td> </tr> <tr> <td>Unlikely</td> <td>High</td> <td>Medium</td> <td>Medium</td> <td>Low</td> <td>Low</td> </tr> <tr> <td>Rare</td> <td>Medium</td> <td>Medium</td> <td>Low</td> <td>Low</td> <td>Low</td> </tr> </tbody> </table>	Likelihood	Consequences					Critical	Major	Moderate	Minor	Insignificant	Almost Certain	Extreme	Extreme	High	Medium	Medium	Likely	Extreme	High	High	Medium	Low	Possible	High	High	Medium	Medium	Low	Unlikely	High	Medium	Medium	Low	Low	Rare	Medium	Medium	Low	Low	Low
Likelihood	Consequences																																									
	Critical	Major	Moderate	Minor	Insignificant																																					
Almost Certain	Extreme	Extreme	High	Medium	Medium																																					
Likely	Extreme	High	High	Medium	Low																																					
Possible	High	High	Medium	Medium	Low																																					
Unlikely	High	Medium	Medium	Low	Low																																					
Rare	Medium	Medium	Low	Low	Low																																					
<p>Risk Statement: (Example: <i>This is a low to medium risk activity as the boys will be supervised at all times. The medium risks for the activity will be transportation risks and medical management risks.</i>)</p>																																										

BBC has also established a Planning Committee which provides oversight of the risk management of all medium or higher risk activities and special events undertaken on-campus and all activities undertaken outside of the College.

Boarding Risk Management

Brisbane Boys' College is a Member of the Australian Boarding Schools Association and upholds the Standards under AS 5725:2015 Boarding Standard for Australian schools and residences, in order to promote and safeguard the welfare of students for whom boarding accommodation is provided. The Standard covers a wide range of aspects of boarding associated with safeguarding including child protection policies and requirements, student safety, health and general wellbeing, personal development and supervision.

International Students

Brisbane Boys' College has CRICOS registration to enrol a maximum of 75 full fee paying 500 (formerly 571) visa subclass students.

In addition to upholding the Standards under AS5725:2015 above, Brisbane Boys' College must also meet the requirements of the *Education Services for Overseas Students (ESOS) Act 2000* and The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018) in relation to child welfare and protection appropriate to any overseas student enrolled who is under 18 years of age and for whom the College has agreed to accept welfare responsibility.



Brisbane Boys' College does not provide homestay for students and as such the PMSA Homestay Policy and Homestay Risk Management Strategy referenced on page 35 are not applicable in the context of this Risk Management Strategy.

This commitment is evidence of the PMSA's fulfilment of the requirements of Schedule 1, section 4(7) of the Working with Children (Risk Management and Screening) Regulation 2020.

Implementation of the Child Safe Standards is continuously reviewed and improved

Child safe institutions know it is a significant challenge to maintain a safe environment for children in a dynamic organisation. The institution's leadership maintains vigilance in putting in place systems to frequently monitor and improve performance against Child Safe Standards. An open culture encourages people to discuss difficult issues and identify and learn from mistakes. Complaints are an opportunity to identify the root cause of a problem and improve policies and practices to reduce the risk of harm to children. Where appropriate, the institution seeks advice from independent specialist agencies to investigate failures and recommend improvements.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13

Under the PMSA Blue Card (Working with Children) Policy, Brisbane Boys' College is required to:

- satisfy the requirements of the policy and must report to the PMSA regularly on their compliance.
- arrange for the requirements of the policy to be audited annually.
- provide the result of the audit to the BBC Council and the PMSA Board via the Headmaster.

The Head of Business Operations at Brisbane Boys' College is responsible for ensuring the policy is complied with in the College.

Section 15 of the *Education (Accreditation of Non-State Schools) Regulation 2017* requires that Schools have processes in place to rigorously implement the Working with Children legislation.

Brisbane Boys' College undertakes an audit of its compliance with the requirements of the PMSA Blue Card (Working with Children) Policy annually. The scope of the audit includes:

1. Blue Card Register
2. Training
3. Auditing
4. Risk management strategies

The Audit findings are reported to the Headmaster and the BBC School Council.

In addition to conducting an annual audit against the requirements of the PMSA Blue Card (Working with Children) Policy, once every four years Brisbane Boys' College commissions an audit from an external auditor independent of the College to audit the College's compliance with the PMSA Blue Card (Working with Children) Policy, including an audit of the College's Blue Card Register. The auditor provides a copy of their report directly to the PMSA Group Office at the same time as the report is provided to the College. Brisbane Boys' College will order the commissioning of the next external audit in 2022.



In addition to the auditing of compliance against the requirements under the PMSA Blue Card (Working with Children) Policy, Brisbane Boys' College also undertakes internal quality assurance and reporting of compliance with the *Working with Children (Risk Management and Screening) Act 2000* via various internal audits and reporting mechanisms including:

- Blue Card Primary Data Cross Check
- Monthly internal quality of data checks
- Monthly Blue Card Register quality assurance reporting
- Internal Blue Card primary data cross check – each Semester
- Monthly reporting to BBC Council
- Audit of staff compliance with the completion of the BBC and ISQ online training modules – annually
- Audit of the requirements of the PMSA Blue Card (Working with Children) Policy – annually

The BBC Child and Youth Risk Management Strategy is reviewed annually, after any incidents and in response to any changes in relevant legislation to ensure that risks continue to be addressed and minimised throughout the College.

The PMSA Group Office under the oversight of the PMSA Child Protection and Safeguarding Committee undertake regular reviews of the PMSA policies and practices as they relate to child protection.

Brisbane Boys' College:

- undertakes regular reviews of the College's policies and procedures which address the elements of the Child Safe Standards.
- ensures that BBC policies and procedures are accessible and easy to understand
- engages in stakeholder consultation to inform the development of policies and procedures
- ensures its leaders champion and model compliance with policies and procedures
- ensures staff understand and implement the policies and procedures

Information about all complaints and concerns, including breaches of relevant policies or the Code of Conduct, is recorded and analysed, including in relation to processes, timeframes and record keeping practices and managed under the relevant Human Resources policy. Systemic issues are identified and mitigated through this process.

This commitment is evidence of the PMSA's fulfilment of the requirements of Schedule 1, section 4(6) of the Working with Children (Risk Management and Screening) Regulation 2020 and is aligned with the following National Principles for Child Safe Organisations –

- National Principle 9 – Implementation of the Child Safe Standards is continuously reviewed and improved

CONSISTENCY

Policies and procedures which address Child Safe Standards, including compliance with the blue card system

A child safe institution has localised policies and procedures that set out how it maintains a safe environment for children. Policies and procedures should address all aspects of the Child Safe Standards. The implementation of child safe policies and procedures is a crucial aspect of facilitating an institution's commitment to them.

The Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report: Volume 13



Brisbane Boys College is committed to providing safe environments by developing and implementing policies and procedures which together with relevant child protection legislation aim to assist all employees, volunteers and contractors to value and guide the relationships they have with the children and young people in their care, through appropriate actions and behaviours.

Policies and procedures which address Child Safe Standards, including compliance with the blue card system are available on the BBC website, PMSA website, or on the PMSA Staff Portal via the PMSA website. Please note the PMSA Staff Portal requires staff to login using their PMSA portal username and password.

Australian Standard, AS 5725:2015 Boarding Standard for Australian schools and residences

The Standard provides a framework of required topics that need to be addressed in order to deliver a safe, healthy and productive environment for boarders, including to promote and safeguard the welfare of students for whom boarding accommodation is provided. The Standard covers a wide range of aspects of boarding associated with safeguarding including child protection policies and requirements, student safety, health and general wellbeing, personal development and supervision.

Australian Student Wellbeing Framework

The Australian Student Wellbeing Framework supports Australian schools to provide every student with the strongest foundation possible for them to reach their aspirations in learning and in life. The Framework is based on evidence that demonstrates the strong association between safety, wellbeing and learning.

BBC Anti-Bullying Policy

The BBC Anti-Bullying Policy sets out the requirements for dealing with bullying and is aligned to the Australian Student Wellbeing Framework (2018)

BBC Anti-Bullying Protocols

- Student Protocol
- Staff Protocol
- Parent Protocol

BBC A Safe Place to Learn and Grow (Safeguarding and Standards of Behaviour) for Volunteers

The BBC Safeguarding and Standards of Behaviour for Volunteers document outlines the responsibilities volunteers have in safeguarding the students in their care whilst working at Brisbane Boys' College, including working with children obligations, including restricted persons declaration, reporting obligations and standards of behaviour.

BBC Social Media (Student Usage) Policy

The BBC Social Media (Student Usage) Policy aims to provide clarity on how students enrolled at Brisbane Boys' College should conduct themselves in their use of Social Media, including where there is a connection with the College.

BBC Student Acceptable Use of Technology Policy

The BBC Student Acceptable Use of Technology Policy is to provide students with a statement of their responsibilities while using Brisbane Boys College's information and communication services (ICT), including what constitutes acceptable and unacceptable use.

BBC Tablet PC Program Agreement 7 -12

The BBC Tablet PC Program Agreement 7-12 communicates the expectations of Brisbane Boys' College's learning community related to information and communication resources.



BBC Blue Card Register

Under the *Working with Children (Risk Management and Screening) Act 2000*, Brisbane Boys' College maintains an employee register of all paid employees and volunteers, including those who are not required to hold a Blue Card (e.g. teachers, health practitioners and individuals working at BBC in restricted employment) under the Act.

Complaint Handling Guide: Upholding the rights of children and young people 2019

To support organisations to build their capacity in handling complaints involving children and creating child safe cultures, the Office of the NSW Ombudsman, in consultation with the Office of the e-Safety Commissioner, Australian Human Rights Commission and children's guardians, commissioners and ombudsman's offices across Australia developed the *Complaint Handling Guide: Upholding the rights of children and young people* (the Guide). Principle 6 of the National Principles of Child Safe Organisations states that organisations should have processes to respond to complaints and concerns that are child-focused and uphold the rights of children and young people.

National Principles for Child Safe Organisations

The National Principles collectively show that a child safe organisation is one that creates a culture, adopts strategies and takes action to promote child wellbeing and prevent harm to children and young people. A child safe organisation consciously and systematically:

- Creates an environment where children's safety and wellbeing are the centre of thought, values and actions.
- Places emphasis on genuine engagement with and valuing of children
- Creates conditions that reduce the likelihood of harm to children and young people
- Creates conditions that increase the likelihood of identifying any harm
- Responds to any concerns, disclosures, allegations or suspicions of harm.

Non-State Schools Accreditation Board's Review Program Guidelines

The Non-State Schools Accreditation Board's (NSSAB) Review Program Guidelines provides all PMSA schools with strategies to meet the accreditation requirements of the Non-State Schools Accreditation Review program to demonstrate compliance with the *Education (Accreditation of Non-State Schools) Act 2017*. This includes whether the student protection policies and procedures are compliant with obligations for reporting sexual abuse, suspected sexual abuse under sections 366, 366A and 366B of the *Education (General Provisions) Act 2006* and the reporting of a reportable suspicion under the *Child Protection Act 1999* as required under section 16 of the *Education (Accreditation of Non-State Schools) Regulation 2017*. Furthermore, the governing body must ensure that staff, students and parents are made aware of the written reporting processes; that staff are trained annually in implementing the processes; and that the processes are readily accessible by staff, students and parents. Schools also must have a written complaints procedure to address allegations of non-compliance with written reporting processes.

PMSA Blue Card (Working with Children) Policy

The PMSA Blue Card (Working with Children) Policy sets out the way in which the PMSA and its schools will ensure compliance with their obligations under the *Working with Children (Risk Management and Screening) Act 2000* specifically as they relate to the maintenance of a Blue Card Register, training, auditing and risk management, as they relate to child protection.



PMSA Child Protection Policy

The PMSA Child Protection Policy provides written processes about the care and protection of children, including processes for appropriate conduct of school employees, for the reporting of harm or suspected harm and processes for handling disclosures of harm.

PMSA Code of Conduct

The PMSA Code of Conduct outlines the standard of behaviour expected of all employees, volunteers, and contractors engaged by the PMSA, including as it relates to interactions and relationships with children and young people.

PMSA Gifts and Other Benefits Policy

The PMSA Gifts and Other Benefits Policy provides employees with an understanding of their obligations if they are offered gifts and other benefits by students or other persons connected with the PMSA or the wider community.

PMSA Historical Abuse Redress Policy

The purpose of this Policy is to outline the PMSA's processes for dealing with allegations of Abuse relating to individuals who, as children, received education and/or accommodation or care within a PMSA School or early learning centre but who are not students of the School or centre at the time the allegations are made. Such individuals will be described within this Policy as Former Students.

PMSA Homestay Policy and Homestay Risk Management Strategy

The *PMSA Homestay Policy* provides written processes to ensure that and Homestay arranged by or for PMSA schools comply with the requirements of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018), and the Education Services for Overseas Students Act 2000 for ensuring the suitability of accommodation, support and general welfare for Homestay Students under 18 years of age. The *PMSA Homestay Risk Management Strategy* ensures that the PMSA and its schools have appropriate policies and procedures in place to identify and minimise the risk of harm to Homestay Students where the school has taken responsibility for the accommodation, support and general welfare of the student.

PMSA Professional Relationships with Students Policy

The *PMSA Professional Relationships with Students Policy* outlines to all employees, volunteers and contractors that any action that encompasses inappropriate behaviour that compromises the employees' ability to have professional relationships with students will not be tolerated by the PMSA, and may, in certain circumstances, result in the initiation of disciplinary action under the PMSA Employee Discipline Policy and Procedure. This policy also outlines the standard of behaviour expected of employees and what an individual can do to address the inappropriate behaviour. The focus on this policy is to promote and encourage professional relationships with students.

PMSA Social Media (Personal Use) Policy

The protection of children and young people (both within and outside of PMSA schools) from emotional and psychological abuse, sexual abuse or exploitation perpetrated through electronic means, is taken very seriously by the PMSA. The *PMSA Social Media Policy* provides clarity on how employees of the PMSA should conduct themselves in their use of Social Media and provides guidelines for all employees on appropriate and inappropriate use of electronic devices, such as email, social networking sites, mobile video phones and SMS texting, as it relates to their interactions with students and young people.



Queensland College of Teachers – Professional Boundaries: A Guideline for Queensland Teachers

The Professional Boundaries: A Guidelines for Queensland Teachers provides details and discussion to inform and guide appropriate teacher-student relationships.

This commitment is evidence of the PMSA’s fulfilment of the requirements of Schedule 1, section 4(4) of the Working with Children (Risk Management and Screening) Regulation 2020 and is aligned with the following National Principles for Child Safe Organisations –

- National Principle 10 - Policies and procedures document how the institution is child safe

Strategies for communication and support

Students and Parents

This Risk Management Strategy will be made available to students and parents of Brisbane Boys’ College via the BBC website, student diary, parent information, including that for boarders. The attention of parents, students will be drawn to this Risk Management Strategy at least twice a year via the College newsletters.

Students are informed at assembly and regular classroom meetings about how to protect themselves, and who to report to if they are concerned about their safety.

Employees

All employees new to BBC are directed to the PMSA Child Protection Policy on the first Staff Professional Development Day of each school year, and at the PMSA New Staff Orientation Day held in January each year. The PMSA requires all employees (including sports and activities coaches, music tutors and boarding house tutors and supervisors) to complete mandatory Child Protection training. As a condition of employment, it is a requirement that all staff complete the required mandatory training, both in the first instance and annually thereafter, within one week of commencing employment, preferably within the staff professional development days of each new year.

Policies and procedures, including this risk management strategy, which address Child Safe Standards, including compliance with the blue card system are available on the BBC website and/or the PMSA website, and/or the PMSA Staff Portal via the PMSA website. Please note the PMSA Staff Portal requires staff to login using their PMSA portal username and password.

This commitment is evidence of the PMSA’s fulfilment of the requirements of Schedule 1, section 4(8) of the Working with Children (Risk Management and Screening) Regulation 2020