



BRISBANE GRAMMAR SCHOOL

Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy)

Version 4.2 2023-03

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1. Purpose, Application and Overview

Brisbane Grammar School (**BGS** or **the School**) is committed to protecting the students in our care and has zero tolerance toward abuse and neglect of children and young people. Accordingly, we have developed this *Student Protection and Reporting Policy (and Child Safeguarding the Risk Management Strategy)* (**Policy**) on how to respond to reports and allegations, to assist staff in meeting their responsibilities in this area.

Staff are required to report to the School **any** concerns about the safety of our students, including reporting abuse or neglect perpetrated by Staff within our School or by other persons.

Staff must act on concerns promptly. This means:

- If a student is at imminent risk of harm or in immediate danger, staff are required to report the situation directly to Queensland Police Service on 000;
- Staff are required to provide a written report about any Sexual Abuse (including likely Sexual Abuse) immediately to the Headmaster or a member of the Board of Trustees; and
- All other reports under this Policy should also be made immediately, or if that is not possible, by no later than the end of the working day.

Safeguarding students is a shared responsibility and it is reliant on all members of the School community to keep students safe in our care. This Policy provides written processes about the appropriate conduct of staff, parents and students of the School, including the mandatory reporting obligations of registered teachers and nurses, and in particular processes for:

1.1. Reporting of Harm

Students, parents and staff members to report Harm, and for staff members, including the Headmaster (and where appropriate, a Deputy Headmaster or Head of Middle School) to manage reports of Harm (including “reportable suspicions” of teachers and registered nurses).

Students and parents should report Harm or suspected Harm as soon as possible to any staff member of the School, by speaking with them or in writing.

Staff should report Harm or suspected Harm as soon as possible to the Headmaster, a Deputy Headmaster or the Head of Middle School and keep a written record of their actions. A reportable suspicion of a teacher or registered nurse should be notified to the Headmaster, a Deputy Headmaster or the Head of Middle School, or directly to Child Safety Services.

1.2. Reporting of Sexual Abuse

Staff members to immediately report Sexual Abuse of a student (including likely Sexual Abuse) to the Headmaster or a member of the Board of Trustees in writing, and for the Headmaster and Members of the Board of Trustees to manage reports of Sexual Abuse (or likely Sexual Abuse) of a student.

Staff members who become aware or reasonably suspect that a student has been, or is likely to be, subject to Sexual Abuse by a person (irrespective of whether that person is School staff) should immediately provide the



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Headmaster or a member of the Board of Trustees with a written report, in the form of the Internal Incident Report Form set out in **Annexure A**.

1.3. Reporting of a Child Sexual Offence

Adults (whether they are parents, Staff or students over the age of 18) to report information that causes them to believe, on reasonable grounds (or that ought to reasonably cause them to believe), that a Child Sexual Offence is being or has been committed against a child, and for the Headmaster, the Deputy Headmaster and Head of Senior School and/or the Head of Middle School to manage such reports.

1.4. Reporting of Inappropriate Behaviour

Students, parents and Staff members to report Inappropriate Behaviour by a staff member and for Heads of Year, a Deputy Headmaster, the Head of Middle School or the Headmaster to manage reports of Inappropriate Behaviour by a staff member.

Students and parents should report Inappropriate Behaviour as soon as possible to a Head of Year, a Deputy Headmaster or the Head of Middle School, by speaking with them or in writing.

Staff should report Inappropriate Behaviour as soon as possible to a Head of Year, a Deputy Headmaster or the Head of Middle School and keep a written record of their actions.

Staff should refer to and follow the *Student Protection Procedures for Reporting Harm (Staff)* to understand and comply with their reporting obligations under this Policy. An Internal Incident Report Form, for use by Staff when reporting Harm, Sexual Abuse, Child Sexual Offences or Inappropriate Behaviour, is set out in **Annexure A**. An External Report of Suspected Harm, Sexual Abuse or Child Sexual Offences is set out in **Annexure B**.

Parents and students should refer to and follow the *Student Protection Procedures for Reporting Harm (Students and Parents)* to understand and comply with their reporting obligations under this Policy.

This Policy applies to all Staff, parents and students at BGS and to the BGS Board of Trustees. This Policy applies in all of the School's operational environments and without fail wherever children and young people are participating in the School's activities, programs, services and / or facilities.

Visitors to the School will also be made aware of this Policy and encouraged to report any concerns in accordance with this Policy.

Students are encouraged to participate in conversations around safety and protection and to take a level of accountability for reporting that is appropriate to their age and capacity. However, the School recognises that the responsibility for safety and safeguarding ultimately sits with the adults responsible for their care, including parents and Staff of the School.

The School provides the following fact sheets to explain the rights and responsibilities of parents, students, occasional staff (including volunteers) and visitors under this Policy, published on *My Grammar*:

- Student Protection Fact Sheet – Creating a Safe School Environment – Parents



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- Student Protection Fact Sheet – Creating a Safe School Environment – Students
- Student Protection Fact Sheet – Creating a Safe School Environment – Occasional staff including Volunteers
- Student Protection Fact Sheet – Creating a Safe School Environment – Parents of Boarders
- Student Protection Fact Sheet – Creating a Safe School Environment – Boarding Students
- Student Protection Fact Sheet – Creating a Safe School Environment - Visitors

The School seeks to create an environment where Staff, students and parents are encouraged to, and feel comfortable in, raising concerns and reporting under this Policy, but not a culture of suspicion or one that may invite vexatious complaints.

This Policy was first developed by the School in 2002 and has been and continues to be regularly (at least annually) reviewed and updated in accordance with best practice of the day and to comply with legislation applying in Queensland about the care and protection of students.

While not all legislative mandatory reporting obligations apply to students 18 years and over (and under the *Criminal Code Act 1899* (Qld), do not apply to most students 16 years and over), the School is committed to the protection of all students, and therefore requires Staff, students and parents to internally report all matters that may impact the safety of any student or students of the School.

The BGS *Child Safeguarding and Risk Management Strategy* forms part of this Policy (**Annexure C** to this Policy).

The School's Senior Leadership Team and Board of Trustees have approved and endorsed this Policy.

2. Legislation

The following legislation (as amended or replaced from time to time) is relevant to this Policy:

- *Child Protection Act 1999* (Qld) (**Child Protection Act**)
- *Child Protection Regulation 2011* (Qld) (**Child Protection Regulation**)
- *Crime and Corruption Act 2001* (Qld) (**CCC Act**)
- *Criminal Code Act 1899* (Qld) (**Criminal Code**)
- *Domestic and Family Violence Protection Act 2012* (Qld) (**DFV Protection Act**)
- *Education (Accreditation of Non-State Schools) Act 2017* (Qld) (**Accreditation Act**)
- *Education (Accreditation of Non-State Schools) Regulation 2017* (Qld) (**Accreditation Regulation**)
- *Education (General Provisions) Act 2006* (Qld) (**2006 Education Act**)
- *Education (General Provisions) Regulation 2017* (Qld) (**2017 Education Regulation**)
- *Education (Queensland College of Teachers) Act 2005* (Qld) (**QCT Act**)



- *Working with Children (Risk Management and Screening) Act 2000* (Qld) (**Working with Children Act**)
- *Working with Children (Risk Management and Screening) Regulation 2020* (Qld) (**Working with Children Regulation**)

3. Definitions

In this Policy and its Annexures:

“Adult” means a person who is 18 years or older.

“Child” means a person under 18 years.

“Child in need of protection” means a child who has suffered significant harm, is suffering significant harm, or is at unacceptable risk of suffering significant harm, and does not have a parent able and willing to protect the child from the harm.

“Student Protection Committee” means the committee established to oversee the School’s implementation of and compliance with best practice regarding student safety, in consultation with the Senior Leadership Team. The Student Protection Committee is comprised of members of the School’s teaching Staff, support Staff, students and parents.

“Child Safety Services” means the Queensland Government agency for child protection services that is responsible (presently through the Department of Children, Youth Justice and Multicultural Affairs) for administering the Child Protection Act.

“Child Sexual Offence” means an offence of a sexual nature committed in relation to a child. This includes, for example, an offence against a provision of chapter 22 or chapter 32 of the Criminal Code, such as an offence relating to the making, distribution and possession of child exploitation material, rape or sexual assault.

“Domestic Violence” has the meaning given in the DFV Protection Act, currently, behaviour by a person (the first person) towards another person (the second person) with whom the first person is in a relevant relationship that:

- Is physically or sexually abusive; or
- Is emotionally or psychologically abusive; or
- Is economically abusive; or
- Is threatening; or
- Is coercive; or
- In any other way controls or dominates the second person and causes the second person to fear for the second person’s safety or wellbeing or that of someone else.

“Harm” or **“Harmed”** means any detrimental effect of a significant nature on a student’s physical, psychological or emotional wellbeing, irrespective of cause. Causes of Harm may include, but are not limited to: Physical Abuse, Psychological or Emotional Abuse or Neglect; or Sexual Abuse or exploitation. Harm may be caused by a single act, omission or circumstance, or by a series or combination of acts, omissions or circumstances.

“Inappropriate Behaviour” means behaviour of a staff member that another staff member, student or parent considers inappropriate, or any behaviour of a staff member that is



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otherwise inconsistent with this Policy, the *Code of Conduct (Staff)* or any other policies or procedures of the School.

“Police” means the Queensland Police Service.

“Neglect” occurs when a student’s basic necessities of life are not met and the student’s health and development are affected. Basic necessities of life include food, housing, health care, adequate clothing, personal hygiene, hygienic living conditions, timely provision of medical treatment and adequate supervision.

“Physical Abuse” occurs when a student has suffered, or is at risk of suffering, non-accidental physical trauma or injury. It may include hitting, shaking, throwing, burning, biting and poisoning.

“Psychological or Emotional Abuse” occurs when a student’s social, emotional, cognitive or intellectual development is impaired or threatened. It may include emotional deprivation due to persistent rejection, hostility, teasing, bullying, yelling, criticism or exposure to Domestic Violence.

QCT means the Queensland College of Teachers.

A **“Respondent”** means a staff member, other member of the School community (such as a parent or visitor to the School) or student who is the subject of an allegation dealt with under this Policy.

“Senior Leadership Team” means the Headmaster, the Deputy Headmaster and Head of Senior School, the Deputy Headmasters, the Head of Middle School, the Secretary to the Board of Trustees and Chief Financial Officer, the Chief Information Officer, the Executive Director - Advancement and Community Relations, and the Executive Director - Educational Innovation.

“Sexual Abuse” includes sexual behaviour involving a student and another person where: the other person bribes, coerces, exploits, threatens or is violent toward the student; the student has less power than the other person; or there is a significant disparity between the student and the other person in intellectual capacity or maturity.

“Staff” or a **“staff member”** means all employees, and other personnel such as consultants, contractors, and people undertaking work experience or vocational placements or volunteers working for the School.

A **“student”** means any person regardless of age who is enrolled as a student at the School.

A **“parent”** includes a legal guardian.

STATEMENT OF COMMITMENT

The School is committed to the safety and wellbeing of all students in the School’s care. The School’s staff will treat all students with respect and understanding.

In order to support this commitment, the School is dedicated to educating Staff, students and parents and ensuring accurate implementation and regular review of its policies, procedures and guidelines which have been put into place to effectively address risks to student safety



and to establish a safeguarding culture and practices.

4. Roles, Responsibilities, Principles, Practices and Guidelines relating to Harm, Sexual Abuse and Inappropriate Behaviour

4.1. Summary of Roles and Responsibilities under this Policy

Role	Responsibilities
Board of Trustees	<ul style="list-style-type: none">• Promote the School's commitment to this Policy and its expectations• Approve and endorse this Policy• Support Policy implementation, review and improvement, including appropriate resource allocation• Receive and manage reports as required under this Policy• Consult with the Headmaster about confidentiality issues under this Policy• Consult with and receive reports from the Headmaster about matters dealt with under this Policy and follow up those matters as required• Understand and comply with this Policy• Participate in training in relation to this Policy
Senior Leadership Team	<ul style="list-style-type: none">• Promote the School's commitment to this Policy and its expectations• Approve and endorse this Policy• Support Policy implementation, review and improvement, including appropriate resource allocation• Receive and manage reports as required under this Policy• Report to the Board of Trustees as required under this Policy• Understand and comply with this Policy• Participate in training in relation to this Policy• Headmaster to consult with Board of Trustees about confidentiality issues under this Policy• Headmaster to consult with and report to Board of Trustees about matters dealt with under this Policy and follow up those matters as required
Staff	<ul style="list-style-type: none">• Promote the School's commitment to this Policy and its expectations• Understand and comply with this Policy• Support Policy implementation, review and improvement



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Role	Responsibilities
	<ul style="list-style-type: none">• Participate in training in relation to this Policy
Parents	<ul style="list-style-type: none">• Understand and comply with this Policy• Participate in education offered by the School in relation to this Policy
Students	<ul style="list-style-type: none">• Understand and comply with this Policy• Participate in education offered by the School in relation to this Policy
Visitors	<ul style="list-style-type: none">• Understand and comply with this Policy

4.2. Principles and Practices

BGS will uphold the following principles and practices under this Policy:

- BGS will not tolerate conduct which exposes students to Harm and is committed to the rights of children and young people to feel safe and be safe when participating in the School's activities.
- Protecting students from Harm and the risk of Harm including Sexual Abuse, Child Sexual Offences or Inappropriate Behaviour is fundamental to maximising their personal and academic potential.
- All Staff have a critical role to play in the prevention of Harm to any student, not just in the detection of it and response.
- BGS recognises that students who are subjected to Harm will usually be detrimentally affected by it.
- At BGS, the welfare and best interests of the student will always be a primary consideration, which must override any natural tendencies in the workplace to protect colleagues from adverse circumstances.
- All Staff must ensure that their behaviour towards and relationship with students reflect the highest standards of care for students, and is not unlawful. In particular, Staff must not under any circumstances engage in Physical or Emotional Abuse or engage in sexual conduct of any nature with a student of the School. It is irrelevant whether the conduct is consensual or non-consensual, or condoned by parents or caregivers. The age of the student is also irrelevant.
- Failure of Staff to behave in an appropriate manner toward students may result in criminal or civil proceedings and/or disciplinary action, including dismissal.
- BGS will respond promptly and appropriately to a report of reasonably suspected or actual Harm, or risk of Harm to a student, or a Child Sexual Offence or Inappropriate Behaviour.
- BGS seeks to create an environment where raising concerns is an ordinary professional responsibility and reprisals against staff members or others making a report under this Policy will not be tolerated.
- BGS will act fairly and reasonably towards both the student who has been or is suspected of having been Harmed or at risk of Harm, or the subject of a Child Sexual Offence or Inappropriate Behaviour, and a Respondent.
- BGS will provide appropriate support to both the student who has been or is suspected of having been Harmed or at risk of Harm, or the subject of a Child Sexual Offence or Inappropriate Behaviour, and their parents, and a Respondent. The School will also provide appropriate support to any other Staff and students involved.



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- BGS staff members, students or parents who become aware of or reasonably suspect that a student is being Harmed or is at risk of Harm, or the subject of a Child Sexual Offence or Inappropriate Behaviour, must report it in accordance with the School's reporting procedures. The School will ensure the processes for reporting under this Policy are simple and easily accessible.
- BGS will not permit a person to work in a position in which the School reasonably believes there would be an unacceptable risk of Harm to a student.
- BGS will cooperate with external authorities as appropriate, including the Police, QCT and Child Safety Services, to address allegations of Harm, the commission of Child Sexual Offences or Inappropriate Behaviour.
- BGS promotes and respects the rights of its students to be heard, protected and supported, and the rights of students and their families to have their concerns resolved.
- BGS is committed to equity and diversity and respects and promotes the rights of students to participate in decision making, noting the particular needs of students who are Aboriginal or Torres Strait Islander, have a disability, are from culturally or linguistically diverse backgrounds, identify as LGBTI, or are unable to live at home.

4.3. Procedural fairness

The following principles will govern the application of this Policy:

- That those making a decision are not biased.
- That any staff members against whom allegations are made are informed of the allegations and that no adverse action is taken against a Respondent unless the person is given prior notice of the allegations against them and they have a fair opportunity to respond. However, the School has discretion to suspend a subject staff member from their duties, on full pay if the role is paid.

4.4. Confidentiality and record keeping

Each person who has access to information covered by this Policy must observe appropriate confidentiality. BGS is unable to guarantee absolute confidentiality since applicable legislation and its policies will require the disclosure (internally and externally) of certain details involved in responding to complaints. External authorities such as the Police, QCT and Child Safety Services can compel a person to provide information and give evidence about actions taken under this Policy and to produce documents.

The School may provide information to Staff, students and parents about matters dealt with under this Policy. The extent of any such disclosure will be determined on a case by case basis by the Headmaster, in consultation with the Board of Trustees and/or the School's solicitors. Where the Police, QCT or Child Safety Services are involved, the School will engage with them to ascertain the limits of information that the School is permitted to disseminate.

BGS will keep a permanent confidential record of all matters raised and dealt with under this Policy, including in individual student files, staff files and centrally, as appropriate. The *Privacy Policy and Standard Information Collection Notice* sets out how the School manages personal information provided to or collected by it that is covered by the *Privacy Act 1988* (Cth).



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The Headmaster, or member of the Board of Trustees if applicable, will:

- Report on matters dealt with under this Policy to the Board of Trustees; and
- Take appropriate steps to follow up matters dealt with under this Policy (for example, if a warning is given to a staff member, to make enquiries about whether the behaviour in question has in fact ceased).

4.5. **Crime and Corruption Commission**

To the extent that BGS is subject to the CCC Act, it may be necessary for BGS to also notify and advise the Crime and Corruption Commission of matters dealt with under this Policy. The obligation to do so will be assessed by the School on a case by case basis.

4.6. **Defamation**

A person acting reasonably and honestly providing information to a person who needs to know that information (such as a staff member, a Deputy Headmaster, the Head of Middle School, the Headmaster, a member of the Board of Trustees or a Police officer) is generally excused from liability for defamation.

4.7. **Retaliation**

No person may retaliate or take any adverse action against a person, acting reasonably and honestly, who provides information to a person who needs to know that information (such as a staff member, a Deputy Headmaster, the Head of Middle School, the Headmaster, a member of the Board of Trustees or a Police officer).

4.8. **Promptness**

All steps under this Policy must be carried out as promptly as reasonably practicable in the circumstances.

4.9. **Preventing Harm**

In order to reduce the risk of any Harm occurring, the Headmaster, Deputy Headmaster and Head of Senior School, and the Head of Middle School will implement the *Child Safeguarding and Risk Management Strategy (Annexure C to this Policy)* and the *Recruitment and Selection Policy*.

4.10. **Professional Behaviour**

The professional standards required of Staff are set out in detail in the *Code of Conduct (Staff)*.

The School also provides a *Behaviour Development Policy (Teachers)* and a *Behaviour Development Policy (Students and Parents)*.

4.11. **Support**

The School will provide support for both a student who has been or is suspected of having been Harmed or at risk of Harm, or the subject of a Child Sexual Offence or Inappropriate Behaviour, the student's parents, and the Respondent, through professional counselling (either internal or external), even if the allegations have not yet been proven or disproven.



4.12. Interviews and investigations

If a report is made under this Policy and a staff member is to interview a student involved, then two representatives of the School will be present at the interview and the student will be supported by a parent or School counsellor as appropriate and practicable in the circumstances of the case.

4.13. Other notifications

If a Respondent is a registered teacher, the School will give notification of any matter dealt with under this Policy to the QCT, if and when required to do so under the QCT Act or other applicable legislation.

The School will also comply with all reporting and notification requirements to Blue Card Services arising under the Working with Children Act.

4.14. Police Action

Once a matter has been reported to external authorities, the School is not required to await the outcome of any Police action against the Respondent before taking any internal disciplinary action against the Respondent. The appropriate action is a matter to be determined by the Headmaster on a case by case basis, in consultation with the Board of Trustees and after taking legal or other expert advice if necessary.

4.15. Insurer

The School will keep its insurer informed about circumstances which may give rise to a claim under the School's insurance policies.

4.16. Implementation of this Policy

The Headmaster, Deputy Headmaster and Head of Senior School, and the Head of Middle School will inform members of the School community about this Policy in accordance with the *Child Safeguarding and Risk Management Strategy (Annexure C to this Policy)*, including that:

- The Policy is provided to each new staff member on induction;
- Staff are notified of any changes to the Policy;
- Reference to the Policy is made in Staff meetings at least twice each year;
- At least once each year the Policy is discussed in School Assemblies and weekly Newsletters;
- The Policy is included annually in the student wellbeing curriculum for students; and
- The Policy is published on the School's website and intranet and a hard copy of this Policy is readily available from the School's Administration.

The Headmaster, Deputy Headmaster and Head of Senior School, and the Head of Middle School should take steps to confirm that:

- The School is implementing the processes under this Policy;
- The School publishes fact sheets explaining the Policy to occasional staff (including volunteers), parents, students, visitors and with respect to boarding;
- The School publishes procedures for Staff and for students and parents regarding reporting processes under this Policy;
- Parents receive induction and other information to assist their understanding of the Policy;



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- Staff receive induction and annual refresher training, utilising external expertise where needed, in relation to student protection, including implementing the processes under this Policy; and
- The Student Protection Committee is established and appropriately resourced and supported in performing its functions.

4.17. Review of this Policy

This Policy is to be reviewed at least annually or more frequently if required to respond to legislative changes.

4.18. Complaints

Any concerns in respect of non-compliance with the School's processes set out in this Policy should be dealt with under the *Complaints Policy (Staff)* or *Complaints Policy (Parents and Students)*.

5. Bullying, Discrimination & Sexual Harassment

The School has a responsibility to take reasonable steps to promote a learning environment free from bullying, discrimination and sexual harassment.

To this end, BGS has the following policies:

- *Bullying Policy*;
- *Inclusive Education Policy for Students with Disabilities*;
- *Anti-Discrimination Policy*; and
- *Sexual Harassment Policy*.

BGS recognises that bullying, discrimination and sexual harassment will generally amount to Harm to a student. If Harm is reasonably suspected it must be managed and reported under this Policy and its related procedures.

Likewise, if Sexual Abuse or likely Sexual Abuse is reasonably suspected, or there are reasonable grounds for believing that a Child Sexual Offence is being or has been committed, these must be managed and reported under this Policy and its related procedures.

6. Indicators of Harm including Sexual Abuse

It is often the case that students are Harmed by someone they know and trust – a parent, sibling, other relative, family friend, care provider or person involved in community. Staff members and parents should be aware of the possible physical, emotional and behavioural indicators of risk of student Harm, and actual Harm. The indicators are more significant if they are severe or consistent over time. It is important that Staff and parents understand signs of potential abuse.

6.1. Indicators of Harm

Physical Abuse and/or excessive punishment

- Student presents with bruises, burns or fractures at a frequency which is inconsistent with normal activity;



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- Student offers explanations for an injury which appear inconsistent with that injury;
- Student or another person advises that they have been subjected to or threatened with physical Harm;
- Reluctance/refusal of student to participate in swimming or other activities where getting changed or wearing more revealing clothes may show signs of Harm; and
- Excessive absenteeism.

Psychological or Emotional Abuse and/or deprivation

- Poor peer relationships/withdrawn/anxious;
- Inclined to seek adult company and/or students who are older or younger;
- Regularly avoiding going home;
- Learning difficulties, including poor concentration;
- Attention-seeking behaviour such as stealing, lying, running away, or repeatedly disrupting classes;
- Social withdrawal including disengagement from School and School activities;
- Declining or underperformance in educational outcomes; and
- Engaging in risk taking behaviour.

Neglect and/or inadequate supervision and/or care

- Student appears underweight for age and body type;
- Inadequate clothing;
- Poor personal grooming;
- Asking other students for food or money or not bringing food for lunches and breaks;
- Excessive absences and/or high frequency of illness/infection; and
- Student often arrives early and/or leaves late.

Sexual Abuse

- Bruises, bite marks or other injuries to breasts, buttocks, arms, lower abdomen or thighs;
- Bruises, scratches or other injuries not consistent with accidental injury;
- Difficulty walking or sitting;
- Persistent headaches or recurrent abdominal pain;
- Unexplained pain in genital area;
- Torn, stained or bloodied underwear;
- Itching, soreness, discharge or unexplained bleeding;
- Painful and recurrent urination;
- Recurrent urinary tract infections;
- Signs of sexually transmitted diseases; and
- Other indicators of Harm as listed above.

Grooming

To aid prevention of Sexual Abuse, and because indicators of Harm will not always be present or observable, it is also important for Staff and parents to be aware of the types of behaviours that can be used in the process of grooming.

“Grooming” is a course of conduct by which a person creates or exploits opportunities that allow the person to safely engage in sexual conduct with a student. Its function is to secure compliance of the student and to avoid



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detection and punishment. Sexual Abuse can be, but is not always, preceded by grooming.

Grooming may occur over a lengthy period. A person may also “groom” the student’s carers or others who might otherwise protect them from the abuse. This occurs so that the student and their carers will trust the offender and not suspect any intended wrongdoing. The establishment of a relationship of trust is often very confusing and damaging to the student, who may not even immediately recognise what is done to them is Sexual Abuse, or Inappropriate Behaviour.

Recognition of the grooming process that is used as a preparation for the Sexual Abuse of a student is an indicator of likely Sexual Abuse. Grooming behaviour may not be recognised when observed as a one-off event, but a pattern of grooming of the intended victim and/or the intended victim’s carers can be recognised. Grooming may tend to develop in intensity over time. It will also tend to include elements of secrecy and concealment, and be more likely to occur in places where the abuser is familiar and where the risk of detection is low.

It is important to be aware of the types of behaviours that can be used in the process of grooming a child or young person, while remembering that some of the behaviours might equally reflect normal interactions based on genuine motives of care and concern. This is the reason that for staff members the observance of clear professional boundaries and transparency in the acknowledgment of potential conflicts of interest is a vital part of the protection of students and of the staff members themselves. This is particularly important in school settings where a staff member’s role entails close and sometimes extended physical, emotional and/or psychological involvement with students (e.g. coaching, instruction, counselling and pastoral care).

Some examples of grooming types of behaviour could include:

- Befriending a vulnerable student;
- Giving a student special attention;
- Treating the student more favourably than others, for example with school work or in co-curricular activities;
- Giving gifts to or doing favours for the student;
- Sharing secrets with the student;
- Arranging opportunities to be alone with the student;
- Sending email or SMS messages of a personal nature;
- Making personal comments to the student about sexuality or relationships;
- Directing suggestive jokes, remarks or actions towards the student;
- Acting as a substitute parent or confidant of the student;
- Befriending the student’s family and visiting the family home;
- Offering to babysit or provide transport;
- Offering individual coaching or special help to the student; and
- Cultivating the trust and confidence of the student’s parents.

There are no precise rules to determine what behaviour is of concern. Some behaviour may be ambiguous taking account of the people involved and the context. If in doubt, Staff and parents are strongly encouraged to discuss any



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issues or concerns with a Head of Year, Student Counsellor or member of the School's Senior Leadership Team.

Everyone should feel free to raise even minor matters, which will assist in small pieces of information being "built up" over time and acted upon where necessary. The School does not wish for anyone to be left on their own in judging whether and how to voice concerns.

As well as educating its Staff, the School will disseminate information about "grooming" and its potential role in Sexual Abuse to parents and seek to engage them in a collective effort to prevent any abuse occurring. If grooming can be detected at an early stage, the behaviour can be stopped before any Harm is done.

7. Processes for Reporting Harm including Sexual Abuse and Inappropriate Behaviour

Staff are required to report to the School **any** concerns about the safety of our students, including concerns about behaviour of Staff within our School or of other persons.

Staff must act on concerns promptly. Specifically, the following steps should be taken:

1. If a student is at imminent risk of harm or in immediate danger, staff are required to report the situation directly to Queensland Police Service on 000;
2. Staff are required to provide a written report about any Sexual Abuse or likely Sexual Abuse immediately to the Headmaster or to a member of the Board of Trustees; and
3. All other reports should also be made immediately, or if that is not possible, by no later than the end of the working day.

Staff should refer to and follow the *Student Protection Procedures for Reporting Harm (Staff)* to understand and comply with their reporting obligations under this Policy.

An Incident Report Form, for use by staff when reporting Harm, Sexual Abuse, Child Sexual Offences or Inappropriate Behaviour, is set out in **Annexure A**. An External Report of Suspected Harm, Sexual Abuse or Child Sexual Offences is set out in **Annexure B**.

Parents and students should refer to and follow the *Student Protection Procedures for Reporting Harm (Students and Parents)* to understand and comply with their reporting obligations under this Policy.

The procedures include processes for:

7.1. Reporting of Harm

Students, parents and staff members to report Harm, and for staff members, including the Headmaster (and where appropriate, a Deputy Headmaster or Head of Middle School) to manage reports of Harm (including "reportable suspicions" of teachers and registered nurses).

7.2. Reporting of Sexual Abuse

Staff members to report Sexual Abuse of a student (including likely Sexual Abuse) in writing to the Headmaster or a member of the Board of Trustees



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and for the Headmaster and Members of the Board of Trustees to manage reports of Sexual Abuse of a student.

7.3. Reporting Child Sexual Offences

Adults (whether they are staff members, parents or students) to report information that causes them to believe, on reasonable grounds (or that ought reasonably cause them to believe) that a Child Sexual Offence is being or has been committed against a child, and for the Headmaster, the Deputy Headmaster and Head of Senior School and/or the Head of Middle School to manage such reports.

7.4. Reporting of Inappropriate Behaviour

Students, parents and staff members to report Inappropriate Behaviour by a staff member and for Heads of Year, a Deputy Headmaster, the Head of Middle School or the Headmaster to manage reports of Inappropriate Behaviour by a staff member.

Failure by any staff member to comply with their reporting obligations constitutes serious misconduct and, will lead to disciplinary action by the School, which may include dismissal. A staff member may also be subject to other legal consequences if the staff member has breached their legislative reporting obligations.

The role of the staff member is not an investigative one. Staff members must not undertake investigations beyond satisfying themselves that they have reasonable grounds to suspect that a student has been Harmed, or is at risk of Harm, or Inappropriate Behaviour (or that they have reasonable grounds for believing that a Child Sexual Offence is being or has been committed). A staff member is not obliged to obtain proof, establish the cause of the Harm or risk of Harm, Child Sexual Offence or Inappropriate Behaviour, or assess its severity. Staff members are encouraged to speak with a member of the School's Senior Leadership Team if unsure whether a matter should be reported under this Policy. Staff should be aware of indicators of Harm and understand what is grooming behaviour, as set out in this Policy.

Once a report has been made in accordance with the School's *Student Protection Procedures for Reporting Harm (Staff)*, the staff member is not required to take further action, beyond continuing to exercise a duty of care and cooperating with any further investigation that is conducted under the Headmaster's direction or by external authorities.

The following guidelines are to assist the Senior Leadership Team in any cases involving Harm or reasonably suspected or likely Harm of a student, the commission of a Child Sexual Offence or Inappropriate Behaviour:

1. Record details of the allegations. Be careful not to lead or taint the evidence of the student who has been or is suspected of having been Harmed or at risk of Harm, or the subject of a Child Sexual Offence or Inappropriate Behaviour, the complainant (if the complainant is not the student) or the Respondent.
2. Refer to the School's reporting procedures and determine whether the allegations should be reported internally and/or to external authorities. If so, report them.
3. Consult with the Board of Trustees and take legal or other expert advice about managing a report of Harm, a Child Sexual Offence or Inappropriate Behaviour, as and when necessary.
4. If the Respondent is a staff member and there is a risk to health and safety, suspend the Respondent from their duties, on full pay if the Respondent's role



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is paid. In extreme and unequivocal cases, the Respondent may be dismissed summarily.

5. If the Respondent is a staff member, allegations may be internally or externally investigated.
6. If the Respondent is a staff member, provide details of the allegations in writing to the Respondent and request a written response. This may occur as part of an investigation process and/or as part of a disciplinary process.
7. Inform the student's parents unless circumstances suggest it would not be in the student's best interests to do so.
8. Inform the Board of Trustees.
9. Attend to public relations.
10. Keep the student, their parents and the Respondent informed as appropriate as the matter proceeds.

7.5. Protections

Relevant legislation provides for protections from liability for persons who, acting honestly and reasonably (or, for Criminal Code disclosures, in good faith), notify or give information about suspected Harm to a student to Child Safety Services or the Police. Child protection legislation also states that merely because the person gives the notification, the person cannot be held to have breached any code of professional etiquette or ethics, or departed from accepted standards of professional conduct.

Child Safety Services operates under strict laws of confidentiality. This means Child Safety Services does not divulge:

- The identity of the person reporting the matter, except to others requiring the information to perform duties under the Child Protection Act; nor
- Information about an investigation to the person reporting the matter.

7.6. Support for the Student and Parents

The School has a responsibility to offer a supportive environment for all students. The following are suggested as ways to support a student who has been Harmed or is at risk of Harm, or the subject of a Child Sexual Offence or Inappropriate Behaviour, and may be in need of protection:

- Treat the student with respect and dignity;
- Be sensitive to the student's needs, feelings and concerns;
- Refer the student to the Student Counsellor;
- Monitor the situation;
- Maintain confidentiality as far as is practicable; and
- Immediately notify the Headmaster, Deputy Headmaster and Head of Senior School, or the Head of Middle School if, after the initial report, any further incidents of Harm are evident or reasonably suspected.

Appropriate support will also be provided to the student's parents. Parents will be advised of confidential external agencies which may be able to assist them, such as "Parentline" (1300 30 1300).

7.7. Educating Students

The School provides education on student protection matters to all students as part of its student wellbeing curriculum. The School's Student Wellbeing Team takes an active role in the wellbeing of all students, including providing professional counselling. Students will also be advised of confidential external



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agencies which may be able to assist them in processing any concerns they may have and steps to report them, such as “Kids Helpline” (1800 55 1800).

7.8. **Mandatory reporting obligations (teacher and registered nurse for a “reportable suspicion”, all Staff for Sexual Abuse, and all Adults for Child Sexual Offences)**

There are mandatory reporting obligations under legislation including the Child Protection Act, 2006 Education Act and Criminal Code. These are included in the *Student Protection Procedures for Reporting Harm (Staff)* and, for Criminal Code reporting, the *Student Protection Procedures for Reporting Harm (Students and Parents)*.

Child Protection Act reporting requirements (teachers and registered nurses)

Under Chapter 2, Part 1AA, Division 2 of the Child Protection Act, teachers and registered nurses¹ (which may include School Nurses) have a mandatory obligation to give a written report to Child Safety Services if the teacher or registered nurse forms a “reportable suspicion” in relation to a child.

A “reportable suspicion” is a reasonable suspicion that a child:²

- Has suffered, is suffering or is at unacceptable risk of suffering, significant Harm caused by Physical Abuse or Sexual Abuse; and
- May not have a parent able and willing to protect the child from Harm.

There are specific requirements regarding the circumstances in which a report must be provided, to whom and the form of the report.

A teacher or registered nurse may confer with a colleague (such as the Headmaster, or another member of the Senior Leadership Team) and share information for particular purposes, including for the purposes of forming a reportable suspicion, making a report and keeping a record of it, and for the Headmaster to take appropriate action to deal with the suspected Harm or risk of Harm.³

A teacher or registered nurse is **not** required to give a report about a matter if they know or reasonably suppose that Child Safety Services is aware of the matter.⁴ If a teacher or registered nurse forms a “reportable suspicion” and does not know or cannot reasonably suppose that Child Safety Services is aware of the matter, then the teacher or registered nurse should follow the *Student Protection Procedures for Reporting Harm (Staff)*.

2006 Education Act reporting requirements (all staff)

Sections 366 and 366A of the 2006 Education Act also provide for mandatory reporting by Staff of actual, reasonably suspected or likely Sexual Abuse of a student. There are specific requirements regarding the circumstances in

¹ A registered nurse is a person registered under the *Health Practitioner Regulation National Law Act 2009* (Qld) to practise in the nursing profession as a nurse, other than as a student, and in the registered nurses division of that profession.

² Section 13E(2) of the Child Protection Act.

³ Section 13H of the Child Protection Act.

⁴ Section 13G of the Child Protection Act.



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which a report must be provided, to whom and the form of the report. See the *Child Protection Procedures for Reporting Harm (Staff)*.

Criminal Code reporting requirements (all Adults)

In addition to the reporting requirements in the Child Protection Act and 2006 Education Act, section 229BC of the Criminal Code provides for the mandatory reporting by all Adults of information relating to Child Sexual Offences. To avoid doubt, the mandatory reporting obligations under the Criminal Code apply to all Adults, whether they are a staff member, parent or a student over the age of 18.

There are specific requirements regarding the circumstances in which a report must be provided, to whom and the form of the report. See the *Student Protection Procedures for Reporting Harm (Staff)* and *Student Protection Procedures for Reporting Harm (Students and Parents)*.

There may be cases where information is not reportable under the Child Protection Act and/or 2006 Education Act, but must be reported under the Criminal Code. If in doubt, always assume that the matter is reportable.

Important note: Under section 229BB of the Criminal Code, adults who are “accountable persons” (including, but not limited to, members of the Board of Trustees, staff and volunteers) will commit an offence if:

- The Adult knows there is a significant risk that another Adult (the **alleged offender**) will commit a Child Sexual Offence in relation to a child who is under the care, supervision or control of the School;
- The alleged offender is associated with the School (or another institution) or is a regulated volunteer;
- The child is under 16 years or is a person with an impairment of the mind;
- The Adult has the power or responsibility to reduce or remove the risk; and
- The Adult wilfully or negligently fails to reduce or remove the risk.

Other reporting requirements

The other reporting obligations included in the *Student Protection Procedures for Reporting Harm (Staff)* are for reporting of Harm or suspected Harm from within and outside the School, and reporting of Inappropriate Behaviour of a staff member.⁵

⁵ Section 16 of the Accreditation Regulation.



8. Deliberate Self-Harm by Students

During their schooling, some students may be at risk of harming themselves. This harm may occur with or without suicidal intent; or may be symptomatic of, or associated with, a medical condition.

8.1. Self-harm with Suicidal Intent

Youth suicide rates in Australia are high. Common risk factors include:

- Previous attempts at suicide (most powerful risk predictor);
- Depression;
- Drugs and/or alcohol abuse;
- Conduct disorder;
- Disruptive and unsupportive family background;
- Relationship conflicts;
- Poor coping skills;
- Psychiatric illnesses;
- Ready availability of lethal means to commit suicide; and
- Copy-cat behaviour after an incident of self-harm by another person.

Other risk factors include:

- Recent bereavement;
- Chronic physical illness;
- Anniversary phenomenon (of past losses or major life events);
- Early loss experiences;
- Academic failure; and
- Perfectionism and overachievement as a result of students having high expectations of themselves.

8.2. Self-harm Without Suicidal Intent

Not all cases of self-harm involve suicidal intent. Students may engage in a variety of high risk behaviours, such as: alcohol/substance abuse; drug-taking; unsafe promiscuity; or cutting/burning oneself.

The School provides educational programs to assist students to make appropriate choices in relation to drug and alcohol use and sexual activity. Refer to the *Drugs Policy* and *Explicit Sexual Material Policy*.

8.3. Reporting Student Self-harm

A risk of self-harm or actual self-harm by a student must be taken seriously and reported and managed in accordance with this Policy.

In the case of an acutely distressed student, the immediate safety of the student is paramount. Staff members must (in the following order and priority):

- Ensure the immediate safety of the student;
- Arrange for an adult to be with the student at all times;
- Consider whether any other student requires support; and
- Report the Harm or reasonably suspected Harm in accordance with this Policy.

While it is important to provide support to a student, staff members must be careful not to substitute support for professional help.



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Following a report from a staff member, the Director of Counselling and Academic Services or a Student Counsellor or other appropriate professional will meet with the distressed student on the day of the report to conduct an initial assessment and determine an appropriate course of action.

In cases of serious concern, the Director of Counselling and Academic Services or the Student Counsellor under the direction of the Headmaster, Deputy Headmaster and Head of Senior School or Head of Middle School, will notify the student's parents where appropriate and make arrangements for access to further professional assistance.

Staff should refer to the *Operational Procedures for Responding to Students at Risk of Self-Harm*.

8.4. Self-harm as a symptom of a medical condition

Where it is known that a student has a propensity to engage in self-harm that is symptomatic or associated with a medical condition, the Student Counsellor in cooperation with other qualified staff of the School and external treating professionals (where applicable) may devise an individual program of management to prevent or reduce the likelihood of the student engaging in self-harm while participating in the School's activities.

The program may complement any other management procedures adopted outside the School setting to address the self-harm behaviour and may be monitored on an ongoing basis and modified as appropriate to maximise socially adaptive behaviour.

9. Contact Information

If you have any questions regarding this Policy, please contact:

- Headmaster, via headmaster@brisbanegrammar.com or 3834 5200
- Deputy Headmaster and Head of Senior School, via senior.school@brisbanegrammar.com or 07 3834 5200
- Head of Middle School, via middle.school@brisbanegrammar.com or 3834 5200
- Blue Card Services (Department of Justice and Attorney-General), via 07 3211 6999 or 1800 113 611
- Queensland College of Teachers, via 07 3377 4777
- Police (Brisbane City North), via 07 3364 6464
- Child Safety Services (Department of Communities) Brisbane Regional Intake Services, via 1300 682 254
- Child Safety After Hours Service Centre, via 1800 177 135
- Family and Child Connect, via 13 32 64
- Kids Helpline, via 1800 55 1800
- Parentline, via 1300 30 1300



10. Related Documents

- Anti-Discrimination Policy
- Behaviour Development Policy (Students and Parents)
- Behaviour Development Policy (Teachers)
 - Behaviour Development Policy (Teachers): Communication Record (*internal School procedure for staff*)
 - Behaviour Development Policy (Teachers): Operational Procedures for responding to serious breaches of the Code of Expectations and Behaviour (Students) (*internal School procedure for staff*)
- Bullying Policy
 - Bullying Policy: Operational Procedures for Responding to Bullying (*internal School procedure for staff*)
- Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy)
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Operational Procedures for Responding to Students at Risk of Self-Harm (*internal School procedure for staff*)
 - Student Protection Procedures for Reporting Harm (Parents and Students)
 - Student Protection Procedures for Reporting Harm (Staff) (*internal School procedure for staff*)
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Boarding Students
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Occasional Staff / Volunteer
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Parents
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Parents of Boarders
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment – Students
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Visitors
- Code of Conduct (Staff)
- Code of Expectations and Behaviour (Students)
- Complaints Policy (Parents and Students)
- Complaints Policy (Staff)
- Counselling Policy
- Drugs Policy
- Explicit Sexual Material Policy
 - Explicit Sexual Material Policy: Operational Procedures for Responding to Explicit Sexual Material (*internal School procedure for staff*)
- Privacy Policy and Standard Information Collection Notice
- Recruitment and Selection Policy
- Sexual Harassment Policy
- Social Media Policy



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11. Policy Management

Document Title	Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy)
Author	Deputy Headmaster and Head of Senior School
Version	4.2 2023-03
Date	20 Mar 2023

Document Control

Version	Description	Date
V1.0	H. Stack (Chairman), A. Micallef (DHM-Students), D. Abernethy (Solicitor), Kerry Hurd (Student Counsellor)	2007
V1.10	A. Micallef (DHM – Students) J. Zervos (Head of Middle School)	8 Feb 2010
V1.20	D. Abernethy (Solicitor) G. North (Solicitor) A. Micallef (DHM-Students)	30 Apr 2012
V1.20	Approved: Board of Trustees	10 May 2012
V1.30	D. Abernethy (Solicitor) G. North (Solicitor) A. Micallef (DHM-Students)	Mar 2013
V1.40	L Dorricott (Solicitor), A Micallef (Headmaster)	Sep 2014
V1.50	L Dorricott (Solicitor), A Micallef (Headmaster)	Jan 2015
V1.60	A Micallef (Headmaster), D Abernethy (Solicitor), L Dorricott (Solicitor)	May 2015
V1.70	A Micallef (Headmaster), D Abernethy (Solicitor), L Dorricott (Solicitor)	Jul 2015
V1.70	Approved: Board of Trustees	13 Aug 2015
V1.80	H Stack (Chairman), A Micallef (Headmaster), D Abernethy (Solicitor), L Dorricott (Solicitor)	Nov 2015
V1.80	Approved: Board of Trustees	3 Dec 2015
V1.90	E Roper (Deputy Headmaster – Staff), D Abernethy (Solicitor), L Dorricott (Solicitor) 3456-0067-4823	Jan 2018
V1.90	Approved: Board of Trustees	8 Feb 2018
V1.91	Standardize format – L Dunstan	26 Mar 2018
V2.0	Policy Review - L Dorricott (Solicitor, CCW 3464-6277-5306), David Carroll (Deputy Headmaster – Students)	22 May 2018
V3.0	Policy Review - Corrs Chambers Westgarth (CCW 3445-9447-1693), David Carroll (Deputy Headmaster – Students)	30 Aug 2019
V3.0	Reviewed by SLT	26 Nov 2019
V3.0	Approved: Deputy Headmaster – Students, D Carroll	4 Mar 2020
V3.0	Policy Review - Corrs Chambers Westgarth (CCW 3451-2821-4287v8), David Carroll (Deputy Headmaster – Students)	29 Apr 2020
V3.1	Standardize format – L Dunstan	30 Apr 2021
V4.0	Approved: Board of Trustees	13 May 2021
V4.1	Policy Review - Corrs Chambers Westgarth (N Le Mare, Solicitor. C Jang, Solicitor - 3476-1580-9813v1)	2 Jul 2021
V4.1	Approved: Deputy Headmaster and Head of Senior School, D Carroll	5 Jul 2021



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Version	Description	Date
V4.2	Approved Board of Trustees.	9 Mar 2023

Distribution

Version	Recipient	Date
V1.20	Board of Trustees	10 May 2012
V1.20	BGS (MyGrammar)	3 Jun 2012
V1.20	BGS Staff Announcement – Staff PD Day	16 Jul 2012
V1.80	BGS (My Grammar)	7 Dec 2016
V1.80	BGS Staff Announcement – Staff PD Day	18 Jan 2016
V1.91	BGS (MyGrammar)	26 Mar 2018
V1.91	BGS Staff Announcement	26 Mar 2018
V2.0	BGS Staff Announcement	22 May 2018
V3.0	BGS (MyGrammar and Website) BGS Staff Announcement	6 March 2020
V4.0	BGS (MyGrammar and Website) BGS Staff Announcement	26 May 2021
V4.1	BGS (MyGrammar and Website) BGS Staff Announcement	20 Jul 2021
V4.2		



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ANNEXURE A - INCIDENT REPORT FORM

This form is for use by all Staff when reporting Harm, Sexual Abuse, Child Sexual Offences or Inappropriate Behaviour. Refer to the *Student Protection Procedures for Reporting Harm (Staff)*.

Terms in this form have the meaning given in the School's *Student Protection and Reporting Policy*.

INCIDENT REPORT	
Section 1: Details of person preparing report	
Full name	
Staff number	
Position title	
Type of staff member (tick the option that applies)	<input type="checkbox"/> I am staff member <i>other than</i> a teacher or registered nurse (go to section 2) <input type="checkbox"/> I am staff member who is a teacher or registered nurse (go to section 2A)
Section 2: Reason for making report (Only complete if you are a staff member other than a teacher or registered nurse)	
Why are you making this report?	<input type="checkbox"/> I am aware or reasonably suspect that a student has suffered, is suffering, or is at unacceptable risk of suffering, Harm <input type="checkbox"/> I have received a report from a student or parent regarding Harm to a student <input type="checkbox"/> I am aware or reasonably suspect that a student has been, or is likely to be, Sexually Abused by a person <input type="checkbox"/> I have gained information that causes me to believe on reasonable grounds that a Child Sexual Offence is being or has been committed against a child by another Adult at a time when the child is or was under 16 years, or is or was 16 or 17 years with an impairment of mind <input type="checkbox"/> I wish to report Inappropriate Behaviour by another staff member
Section 2A: Reason for making report (Only complete if you are a staff member who is a teacher or registered nurse)	
Why are you making this report?	<input type="checkbox"/> I have a reasonable suspicion that a student has suffered, is suffering, or is at unacceptable risk of suffering, significant Harm caused by Physical Abuse or Sexual Abuse, and may not have a parent able and willing to protect them from the Harm (a reportable suspicion) <input type="checkbox"/> I do not have a reportable suspicion, but consider that a student is likely to become in need of protection if no preventative support is given <input type="checkbox"/> I am aware or reasonably suspect that a student has been, or is likely to be, Sexually Abused by a person <input type="checkbox"/> I have gained information that causes me to believe on reasonable grounds that a Child Sexual Offence is being or has been committed against a child by another Adult at a time when the child is or was under 16 years, or is or was 16 or 17 years with an impairment of mind <input type="checkbox"/> I wish to report Inappropriate Behaviour by another staff member
Section 3: Details of affected student	
Student's name	
Student's age	
Student's sex	
Student's grade/class	
Student's contact details (e.g. phone number, address)	



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INCIDENT REPORT	
Section 4: Details of alleged Harm, Sexual Abuse, Child Sexual Offence or Inappropriate Behaviour	
Date(s) of Harm, Sexual Abuse, Child Sexual Offence or Inappropriate Behaviour	
Person(s) who may have caused the Harm or engaged in Sexual Abuse, Child Sexual Offence or Inappropriate Behaviour	
Details of the Harm, Sexual Abuse, Child Sexual Offence or Inappropriate Behaviour (include as much information as possible)	
<i>For teachers and registered nurses only:</i> If you have a reportable suspicion, on what basis did you form that suspicion?	
<i>For teachers and registered nurses only:</i> If you are aware of or reasonably suspect Sexual Abuse or likely Sexual Abuse, on what basis did you form that awareness or suspicion?	
Are there any other persons who may be able to give information about the Harm, Sexual Abuse, Child Sexual Offence or Inappropriate Behaviour?	
Section 5: Actions taken	
Have you taken any action to date in relation to the matter apart from this report?	
Section 6: Date of report	
Date report prepared	



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ANNEXURE B – EXTERNAL REPORT



BRISBANE GRAMMAR SCHOOL

Private and Confidential - Report of Suspected Harm, Sexual Abuse or Child Sexual Offence

Child Protection Act 1999 (Qld) chapter 2 part 1AA
Education (General Provisions) Act 2006 (Qld) chapter 12, part 10
Criminal Code Act 1899 (Qld) section 229BC

Date:
School:
School Phone:
School Email:
School Address:

DETAILS OF CHILD HARMED, AT RISK OF HARM/ABUSE OR THE SUBJECT OF A CHILD SEXUAL OFFENCE:	
Legal Name:	Preferred Name:
DOB:	Sex:
Year Level:	Cultural Background:
Primary language spoken:	
Aboriginal <input type="checkbox"/> Torres Strait Islander <input type="checkbox"/> Aboriginal and Torres Strait Islander <input type="checkbox"/>	
Does the student have a disability verified under EAP: Yes <input type="checkbox"/> No <input type="checkbox"/>	Disability Category:
Student's Residential Address:	Phone:
	Student's Personal Mobile: N/A

FAMILY DETAILS	
Parent/caregiver 1:	Relationship to Student:
Address (if different from student):	
Phone: (H): (W): (M):	
Parent/caregiver 2:	Relationship to Student:
Address (if different from student):	
Phone: (H): (W): (M):	
Is the student in out of home care? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Are there any Family Court or Domestic Violence orders in place? Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/>	

PERSON ALLEGED TO HAVE CAUSED THE HARM, ABUSE OR CHILD SEXUAL OFFENCE		
<input type="checkbox"/> Adult family member	<input type="checkbox"/> Child family member	<input type="checkbox"/> Other adult
<input type="checkbox"/> Student/other child	<input type="checkbox"/> Unknown	

PROVIDE ALL INFORMATION YOU HAVE WHICH LED TO THE SUSPICION OF HARM OR ABUSE, OR BELIEF THAT A CHILD SEXUAL OFFENCE IS OR HAS BEEN COMMITTED (Attach extra pages if necessary).
--



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Details of any harm and/or sexual abuse to the student and/or child sexual offence – please include:
Time and date of the incident; location of the incident, source of information; details of person alleged to have caused the harm or sexual abuse or committed the child sexual offence; physical appearance of any injury; immediate and ongoing safety concerns; any disclosures made by student; any previous incidents of harm; behavioural indicators of harm; presence of any medical needs or developmental delays; and if the information relates to an unborn child, the alleged risk to the unborn child.

Please indicate the identity and particulars of anyone else who may have information about the harm, abuse and/or child sexual offence

Additional information provided as an attachment YES ☐ NO ☐

Name of staff member making report if not the Principal:

Position:	Signature:	Date:
Principal:	Signature:	Date:

Principal's email address: Headmaster@brisbanegrammar.com

Response requested by school:

ACTION TAKEN

Form was emailed to (please tick which agencies the form was sent to):	<input type="checkbox"/>	Queensland Police Services (QPS)
	<input type="checkbox"/>	Department of Children, Youth Justice and Multicultural Affairs
	<input type="checkbox"/>	Family and Child Connect

(Adapted from EQ SP-4 Report of Suspected Harm or Risk of Harm)

Confirm receipt of emailed form and ensure original is stored in a secure location along with any other documentation collected for the purpose of this report.



ANNEXURE C - STUDENT SAFEGUARDING AND RISK MANAGEMENT STRATEGY

1. Purpose and Application

As provided by the Working with Children Act⁶ and Regulation⁷, the purpose of this strategy is to implement employment practices and procedures to promote the wellbeing of students and to protect students from Harm.

This Student Safeguarding and Risk Management Strategy (Strategy) applies to all staff, parents and students at BGS and to the BGS Board of Trustees.

The School's Senior Leadership Team and Board of Trustees have approved and endorsed this Strategy.

Terms in used in this Strategy have the meaning given in the School's *Student Protection and Reporting Policy*.

2. Statement of Commitment

BGS is committed to the safety and wellbeing of all students enrolled at the School and the protection of students from Harm. BGS is dedicated to eliminating and minimising risks to student safety through this Strategy which includes and refers to various other policies and procedures put in place by the School to address the safety and wellbeing of its students.

The School communicates our commitment to all Staff and ensures that our *Student Protection and Reporting Policy* is available in child and young people-friendly versions that reflects the ages, developmental stage, diversity and abilities of the students to whom we educate.

The School has zero-tolerance approach towards abuse and neglect and takes seriously any raised concerns / incidents.

The School's approach to risk management recognises the potential risks to students in the School context and considers online and physical or psychological environments, and any vulnerable or diverse circumstances of students enrolled at the School.

BGS is committed to equity and diversity and respects and promotes the rights of students to participate in decision making, noting the particular needs of students who are Aboriginal or Torres Strait Islander, have a disability, are from culturally or linguistically diverse backgrounds, identify as LGBTI, or are unable to live at home.

⁶ Sections 171 and 172.

⁷ Section 4.



3. Implementation

In practice, BGS' commitment to the safety and wellbeing of all students enrolled at the School and the protection of students from Harm and Inappropriate Behaviour means that it will implement the measures outlined below.

a) Codes of Conduct

The School is committed to informing each person involved in the delivery of our services about their role and the behaviour that the School expects in relation to safeguarding students from abuse and neglect. This Strategy, the School's *Student Protection and Reporting Policy*, *Code of Conduct (Staff)* and the *Code of Expectations and Behaviour (Students)*, outline clear standards of conduct to follow in the areas of teaching and learning, the curriculum, student wellbeing, personal conduct, attending School events, and the relationships one has with students, parents, colleagues and the School. The School also provides a *Behaviour Management Policy (For Teachers)* and a *Behaviour Management Policy (For Students and Parents)*.

b) Recruitment, Selection, Training and Management Procedures

The School is committed to recruiting, selecting, training and managing staff in such a way that limits risks to children and young people. This Strategy, the School's *Student Protection and Reporting Policy* and *Recruitment and Selection Policy* ensure that its recruitment, selection, training and management procedures act to reduce the risk of Harm to children and young people from Staff.

To reduce the risk of Harm to children and young people from Staff, the School implements training and management procedures including:

- Ensuring our safeguarding commitment is communicated to potential applicants for all positions;
- Requiring job applicants to undergo extensive screening processes prior to appointment to minimise the likelihood that the School, or an external recruitment agency or contractor, will recruit a person who is unsuitable to work with our students;
- Holding face-to-face interviews and at least two reference checks which include safeguarding-related questions;
- Management processes that are consistent, fair and supportive, and provide an appropriate level of monitoring and supervision for appropriate practice and behaviour in the delivery of the School's services to its students;
- Formative appraisal processes to monitor and help Staff to improve their performance;
- Ensuring Staff contracts require Staff to comply with School policies including those on child protection and reporting;
- Ensuring duty statements and performance objectives address child safety as a stand-alone criteria;
- Supportive processes for Staff when they are experiencing challenges, such as mentoring, mediation, conflict resolution, coaching, additional training, and external support and counselling services;
- An induction program which thoroughly addresses the School's policies and procedures, particularly its expectations regarding student safeguarding and risk management and to assist staff to understand the rationale for and their role in providing a safe and supportive environment for students;



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- Training new and existing Staff on an ongoing basis and at least annually about the School's policies and procedures, identifying, assessing and minimising risks to children and young people, handling a disclosure or suspicion of Harm to a student and recognition of children and young people's rights, voices and participation, cultural safety and humility;
- Keeping a record of the training provided to Staff;
- Ensuring any failure to observe the School's behavioural guidelines is taken seriously, including taking appropriate disciplinary and legal action wherever necessary;
- Exit interviews as a means to assist the School to identify any issues of concern that may impact on the safety or wellbeing of students of the School; and
- Provision of references for former Staff only by a member of the School's Senior Leadership Team. Appropriate information about any relevant student safety concerns should be made available to anyone genuinely considering a former staff member for other child related employment.

c) **Handling Disclosures or Suspicions of Harm or Inappropriate Behaviour**

The School's *Student Protection and Reporting Policy* sets out policies and procedures for handling disclosures or suspicions of Harm or likely Harm, or Inappropriate Behaviour, including reporting guidelines.

The *Student Protection and Reporting Policy* is approved and endorsed by the Senior Leadership Team and the Board of Trustees and applies to all staff.

The policy requires that:

- Staff must immediately report abuse or neglect and any concerns with policies, practices or the behaviour of other Staff;
- Staff must meet any legislated mandatory reporting requirements;
- Staff must follow a specified process when reporting abuse or neglect including who will receive reports;
- Failure to report is serious misconduct;
- Staff are given a copy of and have access to the policy and understand the implications of the policy for their role; and
- The School documents any allegation, disclosure or concern regarding abuse and monitor responses to all allegations, disclosures or concerns.

d) **Managing Breaches of this Strategy**

The School is committed to appropriately managing breaches of this Strategy in accordance with its other relevant policies as appropriate in the circumstances, such as the *Student Protection and Reporting Policy*, *Sexual Harassment Policy*, *Bullying Policy*, *Anti-Discrimination Policy* and the *Code of Conduct (Staff)*, *Complaints Policy (Staff)* and *Complaints Policy (Parents and Students)*.

The School via the Senior Leadership Team will promptly record, monitor and report to the Board of Trustees regarding any breaches of this Strategy.

e) **Implementing and Reviewing this Strategy**

"Responsibilities" for implementing this Strategy are set out at section 4 below.

"Compliance and Monitoring" at section 5 below states the School's commitment to reviewing this *Student Safeguarding and Risk Management Strategy*.



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The School acknowledges that “best practice” in relation to student protection is a continual process and that the School’s approach will need to be monitored and developed as appropriate.

f) **Blue Card policies and procedures**

The School is committed to acting in accordance with the Working with Children Act relating to the screening of staff in such a way that limits risks to children and young people. In particular, BGS will:

- Comply with all of the requirements of the Working with Children Act and Working with Children Regulation;
- Appoint a School contact person who will be responsible for managing the screening process and all related documentation and records required under the Working with Children Act and Working with Children Regulation;
- Meet all reporting and notification requirements arising under the Working with Children Act and Working with Children Regulation; and
- Act to monitor the dates of expiry of Blue Cards and Exemption Cards and remind staff to keep their Blue Card or Exemption Card up to date.

g) **High risk management plans**

The School is committed to identifying risks, assessing risks, eliminating and minimising risks and the monitoring of risk to the safety of children and young people on an ongoing basis, including in relation to high risk activities (such as outdoor education, tours and sports) and special events. BGS utilises various risk management tools to assist it in this process and will keep appropriate records of decisions made and actions taken in relation to managing risks to children and young people. BGS will consider online, physical and psychological risks, and any vulnerable or diverse circumstances of children and young people. The School has a *Risk Management Policy* and *Risk Management Strategy Framework*.

h) **Strategies of Communication and Support**

The School makes this Strategy available to students, parents and Staff via its Website and Parent Portal.

The School is committed to training Staff in relation to risks to children and young people and will conduct this training regularly via professional development at Staff meetings and regular discussions between managers and their Staff. Such training will (amongst other things) aim to help Staff identify risks of Harm and how to handle disclosures or suspicions of Harm, and outline this Strategy.

The School is also committed to educating students and parents about these issues, and creating an environment which encourages students to raise concerns they may have for themselves, or others, relating to Harm or Inappropriate Behaviour. The School has processes for seeking and incorporating input and feedback with students and their families. The School respects diversity and seeks to facilitate effective communication and engagement.

The School promotes participation and empowerment of students and provides opportunity for their voice and ideas to be heard, and space to express their needs and concerns. BGS actively encourages our students to



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take part in the decision-making process, particularly on matters affecting them. The School creates opportunities for involvement and seeks input and feedback to inform our policies, procedures and practices.

BGS provides information to students and their families (such as fact sheets, posters, handbooks, presentations, guidelines) about:

- The School's commitment and approach to upholding and safeguarding the rights of children and young people;
- The behaviour expected of our Staff;
- The behaviour expected from students and their families; and
- The School's policy and mechanisms for reporting abuse or concerns.

The Student Protection Committee is also established and appropriately resourced and supported in performing its functions.

4. Responsibilities

The School as led by its Senior Leadership Team is responsible for developing and implementing this *Student Safeguarding and Risk Management Strategy* and related policies and procedures. All Staff are responsible for understanding, promoting and acting in compliance with this *Student Safeguarding and Risk Management Strategy* and other School policies and procedures.

5. Compliance and Monitoring

The School will review this *Student Safeguarding and Risk Management Strategy* at least annually (or more frequently if required) to respond to legislative or operational changes, incident outcomes and other matters deemed appropriate by the Senior Leadership Team or Board of Trustees.

To identify any key improvements needed, the School incorporates findings from; internal audits / reviews that assess its ongoing compliance with responsibilities to keep students safe, input and feedback received by students and their families, feedback gained from communication with staff and feedback gained from 'complaints and compliments' received.

The School has a process of review of each adverse event arising under the *Student Protection and Reporting Policy*. It will include a team of key stakeholders reviewing the adverse event with a view to identifying what can be learned from the event and if necessary, implementing necessary changes to current policy and procedures as a result. This action will be part of a generated list of tasks to be addressed by the Student Protection Committee.

BGS is also committed to other various compliance and monitoring arrangements made under related policies and procedures.



6. Related Documents

- Anti-Discrimination Policy
- Behaviour Development Policy (Students and Parents)
- Behaviour Development Policy (Teachers)
 - Behaviour Development Policy (Teachers): Communication Record (*internal School procedure for staff*)
 - Behaviour Development Policy (Teachers): Operational Procedures for responding to serious breaches of the Code of Expectations and Behaviour (Students) (*internal School procedure for staff*)
- Bullying Policy
 - Bullying Policy: Operational Procedures for Responding to Bullying (*internal School procedure for staff*)
- Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy)
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Operational Procedures for Responding to Students at Risk of Self-Harm (*internal School procedure for staff*)
 - Student Protection Procedures for Reporting Harm (Parents and Students)
 - Student Protection Procedures for Reporting Harm (Staff) (*internal School procedure for staff*)
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Boarding Students
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Occasional Staff / Volunteer
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Parents
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Parents of Boarders
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment – Students
 - Student Protection and Reporting Policy (and Student Safeguarding and Risk Management Strategy): Creating a Safe School Environment - Visitors
- Code of Conduct (Staff)
- Code of Expectations and Behaviour (Students)
- Complaints Policy (Parents and Students)
- Complaints Policy (Staff)
- Counselling Policy
- Drugs Policy
- Explicit Sexual Material Policy
 - Explicit Sexual Material Policy: Operational Procedures for Responding to Explicit Sexual Material (*internal School procedure for staff*)
- Privacy Policy and Standard Information Collection Notice
- Recruitment and Selection Policy
- Sexual Harassment Policy



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- Social Media Policy