

Student Protection Risk Management Strategy

STUDENT PROTECTION RISK MANAGEMENT STRATEGY

School/College:

Principal:

Student Protection Contacts:

Student Protection Officer: Phone:

Catholic School Authority: Catholic Education Office, Diocese of Toowoomba

School's Governing Body: Corporation of the Roman Catholic Diocese of Toowoomba

Director of the School's Governing Body: Bishop William Morris DD

Contact Number for Police:

Contact Number for Department of Child Safety:

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Appendix 1: Diocese of Toowoomba Catholic Education Board Policy: Child and Youth Protection

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1. ANNUAL INTERNAL AUDIT Schedule

The annual internal audit schedule is completed each year at the time of the Annual School Visit by the school's Senior Education Officer. Parents/guardians and staff will be notified of any changes to the Student Protection Risk Management Strategy as a result of the audit.

YEAR	SIGNATURE	POSITION	DATE
2009		Principal	
		SEO	
2010			
2011			
2012			
2013			
2014			
2015			
2016			
2017			
2018			

2. POLICY with a statement of commitment to the safety and wellbeing of students and the protection of students from harm.

Creating safe and friendly environments for children and young people is an important focus of Catholic Education schools' overall risk management plan. We are committed to implementing processes to reduce students' exposure to risk from harm. We aim to minimize risks we are aware of and to establish procedures to reduce other risks which may arise, particularly in the areas of staff recruitment and selection; variations to school routines through excursions; activities and special events; in promotions and advertising in each school; and in the use of technology.

This response is, in the first instance, inspired by the belief that every child and youth is made in the image of God and must be protected and treated with respect. While parents are the primary educators of their children, this policy is an expression of our partnership with parents in providing for the safety and protection of all children.

A copy of the *Diocese of Toowoomba Catholic Education Board Policy: Child and Youth Protection* is provided in *Appendix 1* of this document.

This policy and risk management strategy is also designed to comply with requirements of the *Commission for Children and Young People & Child Guardian Act 2005*.

3. CODE OF CONDUCT for interacting with students.

The Code of Conduct (the Code) applies to all Toowoomba Catholic Education employees engaged on a relief, casual, fixed term, or continuing basis in schools/colleges of the Diocese of Toowoomba.

A copy of the Code is provided in *Appendix 2* of this document.

4. RECRUITMENT, TRAINING AND MANAGEMENT PROCEDURES for staff.

3.1 Teacher Registration:

All teachers employed in the Diocese of Toowoomba are registered with the Board of Teacher Registration in Queensland. Original certificates of registration and qualifications are cited upon employment and copies are stored in the school and in the teacher's personnel file at the Catholic Education Office. Principals are in-serviced with the process and procedures should there be concerns about staff conduct.

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3.2 Non-Teaching Staff and Volunteers:

All non-teaching staff and volunteers have been issued with a *Blue Card* by the *Commission for Children and Young People*, in accordance with the *Commission for Children and Young People Act 2000*. The school maintains a register of all non-teaching staff and volunteers' Blue Card details, including number and renewal date (See *Appendix 3*). Details of non-teaching employees' Blue Cards are also kept at the CEO on a register and in each relevant individual's personnel file. All Principals understand that new non-teaching employees must have *applied* for a Blue Card prior to the commencement of work and may present the receipt received from the Commission as proof of their application. In addition, all volunteers require a Blue Card *prior* to the commencement of work.

3.3 New Employees

Staff Screening Procedures and Guidelines (See *Appendix 4*) are employed in the selection and recruitment of all new employees in schools. This ensures that teaching staff have been registered with the Board of Teacher Registration and non-teaching staff have been issued with 'suitability notices' (Blue Card) by the Commission of Children and Young People. Reference checks for all applicants are also to be checked by the chair of the selection panel and written referee statements are required for all new teaching staff.

5. REPORTING GUIDELINES and directions for handling disclosures and suspicions of harm.

If confronted with a disclosure of harm to a child or young person, all staff will respond professionally and in the best interests of the child or young person subjected to the alleged harm. Reporting of disclosures and suspicions of harm will be made in accordance with procedures recommended by the Commission for Children and Young People and Child Guardian. Processes and procedures for responding to disclosures and allegations of both harm and inappropriate behavior are outlined in Section 2 of the *Diocese of Toowoomba Student Protection Manual*.

In summary:

- All staff will document the knowledge or suspicion of harm in a non-judgemental and accurate manner as soon as possible;
- The Principal and/School Contact Officer will notify the Department of Child Safety and/or the Queensland Police Service if knowledge or suspicion of harm to a child or young person is reported;
- Reportable knowledge or suspicion of harm to a student includes:
 - Harm by a member of staff;
 - Harm by a fellow student;

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- Harm be someone who is not immediately associated with the school (family member, friend or other);
- Self-harm.
- Any reports or documentation on disclosures of harm will be kept confidential and secure, with access strictly limited and on a 'need to know' basis.

6. POLICY FOR MANAGING BREACHES of the risk management strategy.

Disciplinary responses by the Director or delegate to breaches of this risk management strategy require careful adherence to the procedures outlined in the document *Disciplinary Procedures for Staff* (see *Appendix 5*). The Director or delegate will, in all issues of concern regarding behavior and conduct of employees, utilize and promote constructive communication of procedures as designated in this policy to promote fair and constructive outcomes.

Without limiting the discretion of the Director as to the disciplinary response, the following may be considered:

- A formal written warning that should the conduct and/or behaviour continue, then that may lead to the employee's dismissal from employment;
- Dismissal from employment but only if the Director considers the conduct or behavior proved against the employee constitutes serious misconduct warranting summary dismissal; or
- A formal censure of the employee for engaging in conduct proved against him/her with or without a formal direction that the employee is in future to desist from such behavior or conduct.

7. POLICIES AND PROCEDURES FOR COMPLIANCE WITH BLUE CARD LEGISLATION.

This strategy will be reviewed annually (see *Appendix 6*) and the date of the review will be recorded on the Annual Internal Audit schedule. An external audit is carried out at least every three years or as required.

The annual internal audit schedule is completed each year at the time of the Annual School Visit by the school's Senior Education Officer. Parents/guardians and staff will be notified of any changes to the Student Protection Risk Management Strategy as a result of the audit.

8. PLANNING FOR HIGH RISK ACTIVITIES AND SPECIAL EVENTS.

Forms used for Mandatory Reporting; Register of Concern; Register of Complaints and Disclosures of Harm; and Incident Report Forms are contained in the FORMS TO BE USED section at the end of the *Student Protection Policy and Procedures Manual*.

The following general guidelines are also used in designing and implementing the school's Student Protection Risk Management Strategy (see *Appendix 7*) for high risk activities and special events.

8.1 Activities:

8.11 Planning for Activities and Special Events:

Activity Preparation: Each staff member involved in the planning and delivery of the activity must be aware of the Diocesan and School student protection policies and plans the activity in a way which supports children and young people.

An integral part of the planning for an activity is assessing the actual and potential risks to everyone involved. A risk assessment is an effective way to do this and should be conducted in the planning phase of all activities.

The following factors should be considered in the planning of the activities while conducting the risk assessment:

- The number of people taking part;
- Their age and gender mix;
- The age range of the participants;
- The type of activity;
- The environment where the activity will take place (on-line, by telephone, face-to-face)
- The particular needs of individual participants; and
- The policies and procedures of the Diocese and school.

In addition, there are a number of basic principles that should be taken into account when planning activities, including:

- Maximizing opportunities for students to enjoy themselves and have fun;
- Ensuring the activities support the interests and wellbeing of students;
- Being aware that students should not be left unattended;
- Ensuring staff know where students are at all times, and what they are doing;
- Providing constant adult supervision over any activity using potentially dangerous equipment;
- Ensuring students are supervised by appropriate numbers of adults depending on numbers and age of children and type of activity; and
- Ensuring no dangerous behaviour by students is allowed.

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Identifying the Risks:

During the risk assessment phase, it is essential to identify risks to students in the following key risk areas:

- Environmental
- Human
- Equipment

In each instance, it is important to consider what can happen and how it could happen, in order for risks to be managed or eliminated.

Environmental:

Location: It is important to consider whether the place in which you provide an activity is *location friendly* to students. If you own or lease the area, you may have direct control over the location and facility. In other instances, you may only use the location or facility from time to time. In this case, there may be a greater risk, as you will have less control over the area.

Some things to consider when thinking about the location of an activity could include:

- Inspecting the location to ensure it is safe, or that things haven't changed since you were last there;
- Ensuring the location is appropriate for the activity;
- Ensuring the availability of first aid equipment and consumable items relating to the activity;
- Checking whether there is adequate shade and water available if the activity is to be outdoors;
- Ensuring there is adequate lighting; and
- Check whether there are any potential risks created by other people and activities close to where you will be operating.

Surrounding Environment: It may be necessary when examining the surrounding environment to make adjustments or allowances if there are factors which impact or have the potential to impact on the interests and wellbeing of the students in your care.

Some things to consider about the surrounding environment include:

- Whether there are designated areas for spectators so students do not confuse spectators with your organisation;
- The location's proximity to roads, dangerous obstacles, or waterways;
- Whether toilets, drinking fountains, or taps are a substantial distance away from the activity requiring a spread of supervision;
- Whether there is a lack of shade or shelter; and
- If there are any places where children or young people could hide, or in which other people could be concealed.

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Human:

Supervision is a critical element in providing any service, particularly for students. Supervision will usually be provided by employees or volunteers. Some aspects to consider include:

- Ensuring supervisors are appropriately qualified, well trained and have current competencies;
- Ensuring there are enough people to supervise the number of students involved in the activity;
- Making supervisors aware of their rights and responsibilities as well as the rights and responsibilities of all others involved in the activity; and
- Ensuring supervisors adhere to the policies and code of conduct of the Diocese of Toowoomba.

Who is responsible for what?

It can be easy to overlook the need to clearly identify who is responsible for providing such an activity. This could include responsibilities such as:

- Who will check the site before it is used?
- Who will bring the equipment and check to see if it works beforehand?
- Who will do any setting up that needs to be done?
- Who will be responsible for delivering the actual activity?
- Who will stay behind until everyone has left?

It is important for all involved to be aware of their roles and responsibilities when delivering an activity. Two ways of ensuring this is to have:

- Clear job descriptions, duty statements or role descriptions which outline a person's role in a particular activity; and
- An induction for staff before the first activity which outlines what is expected of each person.

It is also important to ensure that any non-teaching personnel, including volunteers, that are attending the activity with students, possess a current Blue Card as part of the Working with Children Check.

Equipment:

Although some activities for students don't require equipment, many do. If equipment is required for the activities, consider whether:

- The equipment is appropriate for the activity, the age range and capabilities of the student's participating;

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- There is enough equipment of the number involved in the activity. If not, have a system in place to ensure that everyone gets a chance to use the equipment safely and in the way it was intended to be used; and
- The equipment is in good working order and safe for students to use.

Evaluate the Risk:

In consideration of these areas, conduct a risk analysis using section 3 of the Risk Assessment Planning sheet, by consulting with others and using your own experiences. Consider what activities are low risk, and which may pose a high risk.

Treat the Risk:

Decide how you are going to deal with, or treat the risks you have identified and analysed by:

- Identifying all possible options to treat the risks;
- Selecting the most feasible and cost-effective options;
- Developing strategies to treat the risks; and
- Implementing strategies – decide:
 - Who will implement them;
 - What strategies should be implemented;
 - When will they be implemented; and
 - How they will be implemented.

8.12 Providing the activities:

When providing activities for students, the potential risks need to be considered. These could be relatively minor, such as someone not enjoying the activity, or they could be more serious, for example, an accident in which someone is injured.

There are certain things we can do to help minimise the risk and maximize the benefits for students.

Activity Induction

Before the activity goes ahead, it is a good idea to provide an induction about what will happen, regardless of whether it is a 'one off' activity or an activity conducted over a period of time. Provide this information to parents, carers and the students taking part in the activity.

The induction process should:

- Clearly identify what should happen and what is expected of the activity;
- Highlight anything that may be of concern to parents, carers or students;
- Answer any questions that people may have;
- Let people know what will happen if anything goes wrong; and
- Let people know who they can talk to if they have any issues or concerns.

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From the perspective of parents, carers, and students, the induction should:

- Provide an opportunity to ask questions and clarify issues;
- Help them understand what is expected of them;
- Make them aware of what will happen if an issue arises; and
- Let them know who to contact if they have any concerns in the future.

8.13 Monitoring the activities

It is important to take an active interest in what actually occurs at each activity. The activity coordinator should determine how well staff and volunteers are performing their duties and whether they are acting in an ethical and appropriate way.

Strategies to consider include:

- Supervising staff;
- Conducting random audits of activities;
- Doing performance appraisal for employees and volunteers;
- Conducting surveys to find out how the participants felt about activities;
- Rotating staff to supervise different activities; and
- Monitoring the development of students as a result of the activities and addressing any deficiencies.

Continually review and update your strategy:

Your risk management strategy should be reviewed following every significant change, event or issue that occurs in your organization.

Document any changes you make and the reasons they have been made.

Continually review and update your risk management strategies to show employees, volunteers and key stakeholders that you take your responsibility to minimize risk seriously, and that you are committed to maintaining a friendly environment for children and young people.

8.2 Special Events

There may be occasions when students attend an event held by another organization or individual. In these situations, there may be a certain loss of control over the event or activity. As such, it is worth ensuring that attendance at such an event will not compromise your commitment to providing a safe environment for students.

Questions to ask in the decision-making process include:

- Do we have enough information about the event to decide whether it will contribute positively to the well-being and development of the students?

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- Has enough information been provided to parents or carers so they can make an informed decision about whether they want their children to attend?
- Will attending such an event create risks for the students of your school?
- If the event could pose risk, have you evaluated them and developed procedures to minimise those risks?
- Do you know if the event organizers are committed to an environment that is safe and friendly for students?
- Have they developed policies and procedures supporting such an environment?

Special events allow schools to provide additional opportunities to students. It is important to ensure that the experience is positive and fits with your school's student friendly approach to providing activities.

8.4 Promotions and Advertising

When promoting the special features or events of your school, ensure your key messages highlight your commitment to providing friendly environments for students.

Promotional activities or advertising can offer opportunities for your schools, such as:

- Fundraising;
- Promoting an upcoming event eg. Fete;
- Enrolment marketing; and
- Highlighting achievements.

To promote the activities, you may choose to provide a photograph for use in newspapers, flyers, posters or on a website. Be aware of the issues surrounding the use of images of students. You are legally obliged to ensure the identities of anyone under 18 remain confidential in certain situations eg. Where a child may be a victim of a criminal offence or if a child is in care. Always seek legal advice if unsure about releasing information. Steps include:

- Ensure permission is granted from the parent or carer of the student to use the image;
- Ask the student how they feel about the use of the image, ask their permission and allow them some input into how it will be used;
- Provide enough information about how the image will be used so the parent, carer or student can give informed consent;
- Ensure digital and electronic images are formatted so they cannot be altered if downloaded;
- Consider how others will interpret the image;
- Ensure the image is used for its original purpose, and seek permission if the image is to be used in the future in any other way; and
- Consider who will see the promotional or advertising material containing the image.

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Following these steps will assist in the decision-making process of whether it is appropriate for photographs of students to be used in various contexts and will be in the best interest of the student.

8.5 Computers, emails, Internet and mobile phone use.

Schools within the Diocese of Toowoomba provide students and teacher with computer facilities for educational use. The resources provided may include computers, printers, CD Rom access and Internet access.

All schools should have developed and implemented an Acceptable Use Policy to govern the use of the Internet connection by staff and students. Student use should be governed by a written agreement. Parents will be made aware of the Internet links and policies governing its use. Parents should also be included in the signing of the agreement allowing the child/children to have access to the Internet. School Policy on the Internet use should contain restrictions on accessing inappropriate material while providing students with instructions for students while using the Internet.

When using the Internet for class activities, teachers will select material that is appropriate in the light of the age of the students and what is relevant to the subject/lesson objectives. Teachers should preview the materials and sites they require or recommend students access to determine the appropriateness of materials contained or accessed through the site. Teachers will also assist their students to develop the skills necessary to use the information critically.

Filtering Software designed to block access to certain sites that are not acceptable is applied in each school setting.

Example: Acceptable Use Policy: The following uses of the Internet connection are considered unacceptable:

- **Personal safety (students only):** Users will not post personal contact information about themselves or other people.
- **Illegal Activities:** Users shall not use this Internet connection to perform any act that may be construed as illegal or unethical including the use of the connection for unauthorized access to other computers.
- **Inappropriate Language:** Restrictions against inappropriate language apply to public messages, email and material posted on Web pages. Users will not use obscene, profane, lewd, vulgar, rude inflammatory threatening or disrespectful language.
- **Respect for Privacy:** Users will not repost a message that was sent to them privately without the permission of the person who sent them the message. Users will not post private information about another person.
- **Inappropriate Access to material:** Users will not use the Internet link to access material that is: profane, or obscene; that advocates illegal acts or advocates violence or discrimination towards other people. If a user inadvertently accesses such information, they should immediately and quietly disclose the inadvertent access to their teacher or supervisor.

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Mobile Phones: each school has developed a policy regarding the possession and appropriate use of mobile phones for students and staff during school hours.

Acknowledgement: Commission for Children and Young people and Child Guardian. *Safe Environments for Young People: Children Protection – managing the risks.*

9. STRATEGIES FOR COMMUNICATION AND SUPPORT.

Information sheets and education programs for staff, volunteers and parents on Student Protection are contained in the following sections of the *Student Protection Policy and Procedures Manual*:

- Section 3.5 (Staff In-service on Student Protection);
- Section 3.6 (Information and Education Programs for Students and Parents/caregivers);
- Section 3 Appendix 4 (Staff Student Protection In-service Overview);
- Section 3 Appendix 5 (Student Protection Brochure for Parents);
- Section 3 Appendix 6a (Student Protection Brochure for Students);
- Section 3 Appendix 6b (Student Protection In-service for Students Overview);
- Section 3 Appendix 8 (Guidelines for Appropriate Professional Boundaries); and
- Section 5 (In-service and Education for School Communities).