Version 2.2

# Child Safe Anglican Education

## PROCEDURES:
Child Safe Responses

Anglican Schools Commission

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1

# Introduction

Framework | Scope | Roles | Responsibilities

# Introduction

These Procedures: Child Safe Responses (the procedures) are provided to enable Anglican schools, and education and care services (ECS) to implement the **Child Safe Anglican Education Policy** (the policy). These procedures should be read together with the policy.

These procedures are provided by the Anglican Schools Commission (ASC) on behalf of the Anglican Church Southern Queensland (ACSQ).

The procedures apply whenever a potential, perceived or actual concern is received or otherwise identified. Readers should refer to Section 7: Glossary for definitions of key terms used throughout the procedures and Section 8: Practice Resources for supporting templates, forms and other implementation resources.

## Audience

These procedures are required to be applied by all workers. Workers is an inclusive term for any person performing work of any kind within, or on behalf of, an Anglican school or ECS. Note: staff members are specified in this procedure where they have additional responsibilities to that of all workers.

If another person has a concern that this procedure has not been followed, they are also encouraged to use the relevant process outlined in Section 6 Complaints Management.

## Implementation

Decisions and actions by schools and ECS will be informed by these procedures. When specific instructions aren't provided, schools and ECS are advised to seek advice from the ASC and apply the following principles:

- Consider children's safety, wellbeing and best interests using current, evidence-based knowledge and resources.
- Act lawfully and use good judgement.
- Work respectfully in partnership to achieve the best outcomes for children, strengthening family and community safety and support networks.
- Be accountable by documenting decisions and the reasoning behind them.

Where required to apply the policy or administer the procedures, schools and ECS can share information with relevant staff from the ASC and the ACSQ. Information will however not include an individual's identifying information unless permitted by law. The ASC has staff who are available for schools and ECS to consult with on the application and implementation of these procedures. This is to occur whenever reasonable to enable effective implementation, and where not explicit in these procedures, will include advice on what information can be provided in what circumstance.

See Practice Resource: Key Contacts.

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# Quick Reference Guides

Common Role of Most Workers

Child Safe Process Overview

Reporting Overview for Workers

Overview of a Typical Response to Reportable Conduct

# Common Role of Most Workers

NOTE: If a worker has a concern the Procedures: Child Safe Responses have not been complied with, they are to raise this concern, using section 6 of the Procedures: Child Safe Responses.

## 1 RECEIVE

A 'concern' is information where it is reasonable to suspect a child has been harmed, or placed at risk of harm, due to the behaviour of another person and the resulting or potential impact on a child's physical, emotional, psychological or cultural safety.

If you see, hear or feel something - say something.

Workers may receive or otherwise identify a potential, perceived or actual concern relating to a child's safety or wellbeing.

## 2 IDENTIFY

Workers are required to tell (verbal) an Appropriate Person[1] about concerns without unnecessary delay (immediately)[2]. Where a worker is a staff member, they are also required to provide a written account of the concerns (internal email is acceptable when sent securely to the authorised recipients) to provide an accurate record. Note: the worker is responsible for confirming concerns have been received.

Information to Share:

- Who is involved
- What behaviour is concerning
- Suspected impact on the child
- How the concern became known
- Who else may hold relevant information

## 3 GATHER

The Appropriate Person will help by arranging the gathering of relevant information.

## 4 ASSESS & RESPOND

Without limiting the response that may be necessary, the Appropriate Person will help with:

- Risk reduction (noting immediate danger should be responded to via emergency/critical incident processes, including contacting '000').
- External reporting to statutory authorities (Child Safety, Police, QFCC or other authority).
- Internal reporting (both within the school or ECS and to other relevant roles).
- Support provision for those involved.

## 5 REPORT

A worker may also need to:

**Mandatory Reporter:**

Make a written report to Child Safety. See 'Concerns a Child May be in Need of Protection', within section 4B of the Procedures: Child Safe Responses.

**All School Staff:**

Immediately provide concerns about sexual abuse or likely sexual abuse, directly to the Principal or Delegate of the Governing Body in writing. See 'Concerns related to sexual abuse or likely sexual abuse', within section 4B of the Procedures: Child Safe Responses.

**All Workers:**

Raise a reportable allegation or share information about a reportable conviction to the Head of Entity, Delegated Reporting Officer or QFCC. See 'Reportable Conduct', within section 4B of the Procedures: Child Safe Responses.

## 6 MONITOR

Workers may have a role in the ongoing monitoring of a child or children's safety. It is important workers continue to identify and raise concerns if they continue to come to their attention.

[1] Depending on the matter, an Appropriate Person is a Child Safe Advocate (including an ECS Nominated Supervisor), a Principal, an ECS Approved Provider, and in limited circumstances, a Delegated Reporting Officer or Delegate of the Governing Body. Refer to the school or ECS Annexure Child Safe Advocates and other Appropriate Persons, for identifying information

[2] 'Without unnecessary delay' is used to help explain what is meant by 'immediately', recognising that when caring for children there are circumstances where duty of care responsibilities to the safety, wellbeing and best interests of children is paramount.

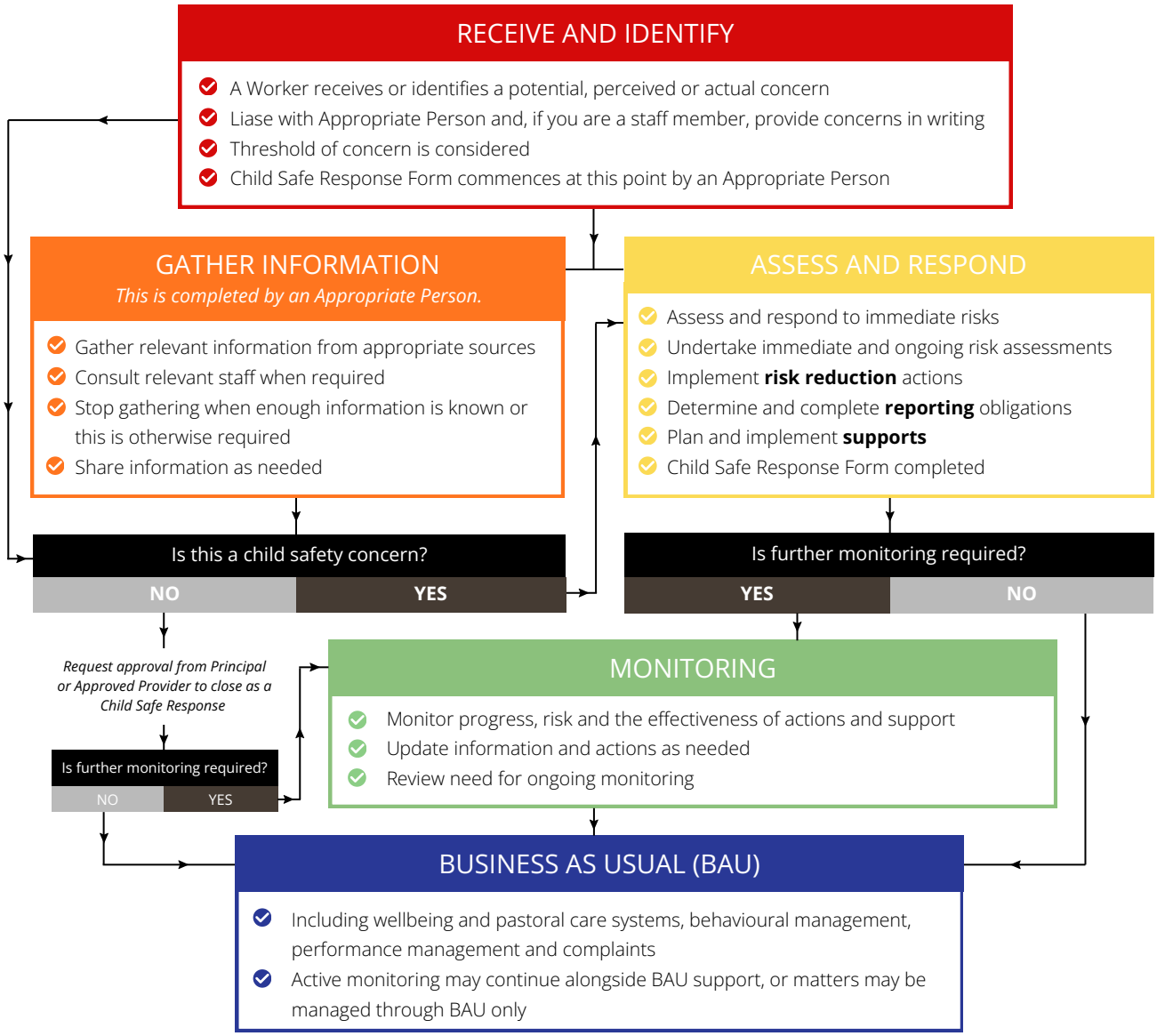
# Child Safe Process Overview

**Concern:**

*A 'concern' is information where it is reasonable to suspect a child has been harmed, or placed at risk of harm, due to the behaviour of another person and the resulting or potential impact on a child's physical, emotional, psychological or cultural safety. This concern can arise in any environment - home, online, school or elsewhere, and includes, but is not limited to, reportable conduct by a worker.*

**Appropriate Person:**

*Depending on the matter, an Appropriate Person is a Child Safe Advocate (including an ECS Nominated Supervisor), a Principal, an ECS Approved Provider, and in limited circumstances, a Delegated Reporting Officer or Delegate of the Governing Body. Refer to the school or ECS Annexure Child Safe Advocates and other Appropriate Persons, for identifying information*




## REVIEW

A review is undertaken of every Child Safe Response Form. The review evaluates the actions taken, identifies lessons and informs continuous improvement.

***Note:*** *Child safe responses are dynamic and responsive to the nature, seriousness and complexity of each concern. This framework is intended to guide professional judgement and does not operate as a strictly linear step-by-step process.* ***Throughout all stages clear communication, consultation and documentation are essential to effective child safe practice.***

# Reporting Overview for Workers

## ALL (POSSIBLE, PERCEIVED OR ACTUAL) CONCERNS FOR A CHILD'S SAFETY

**DEFINITION OF CONCERN**

A reasonable suspicion a child has been harmed or placed at risk of harm, due to the behaviour of another person, and the resulting or potential impact on the child's physical, emotional, psychological or cultural safety. If you see something, hear something or feel something = say something.

**REPORT IMMEDIATELY TO**

Child Safe Advocate, who can help facilitate reporting to the below.

In an ECS a Child Safe Advocate includes a Nominated Supervisor.

**IMPORTANT INFORMATION**

Required under policy for support and assistance, unless a concern has been directly reported to the Principal or the Delegated Reporting Officer/Delegate of Governing Body[1] as listed below.

Includes for example:

- The action or inaction of a parent or caregiver
- Peer behaviour
- Conduct of an adult who has or will have contact with a child through their relationship with the school
- Conduct of another person or unknown person not covered above (e.g. a person online or within the community)

## CONCERNS IMPACTING OPERATIONAL SAFETY OF THE SCHOOL/ECS

**DEFINITION**

Concerns impacting operational safety of the school/ECS, including off-site activities.

Includes any business or group under the authority or control of the school/ECS or providing a service to children due to their attendance at the school/ECS.

**REPORT IMMEDIATELY TO**

**Schools:** Principal
**ECS:** Approved Provider (usually via the Nominated Supervisor)

- Principal/Approved Provider reports to Delegate of Governing Body (within 1 business day).
- For ECS the Approved Provider reports relevant matters to the Early Childhood Regulatory Authority (usually within 24 hours).

**IMPORTANT INFORMATION**

Required under policy for schools, and under law for ECS (Education and Care Services National Law).

This could be related to peer interactions, or the risk posed to children from the conduct of adults.

## REPORTABLE ALLEGATIONS OR REPORTABLE CONVICTIONS

**DEFINITION**

Reportable allegations, or information about reportable convictions about workers, including:

- Child sexual offences
- Sexual misconduct to, or in the presence of a child
- Ill-treatment of a child
- Significant neglect of a child
- Physical violence to, or in the presence of a child
- Behaviour that causes significant emotional or psychological harm to a child

**REPORT IMMEDIATELY TO HEAD OF ENTITY**

**Schools:** Principal
**ECS:** Approved Provider

If concern relates to Head of Entity – report to Delegated Reporting Officer or the Queensland Family and Child Commission (QFCC).
Head of Entity or Delegated Reporting Officer facilitates reporting to QFCC (within 3 business days), other regulators (e.g. QCT, AHPRA) and the Police (where relevant).

**IMPORTANT INFORMATION**

Required under law *(Child Safe Organisations Act)*.

**Notes:**

- Overlaps with 2 (above)
- Workers have a very broad definition – any person performing work of any kind
- Conduct is not limited to the workplace (i.e. can be out of hours, within their home)
- Includes former workers where alleged conduct or conviction occurs after 1 July 2026

## SUSPICION OF SEXUAL ABUSE OR LIKELY SEXUAL ABUSE

**DEFINITION**

Sexual abuse is sexual behaviour where there is coercion, exploitation, violence, threats or bribery; OR the 'child' has less power than the other person; OR there is significant disparity in intellectual capacity or maturity.

**REPORT IMMEDIATELY TO**

**Schools:** Principal, or if unavailable, the Delegate of the Governing Body.
**ECS:** Nominated Supervisor, or if unavailable, the Approved Provider and then if unavailable the Delegate of the Governing Body.

Principal/Nominated Supervisor/Approved Provider, or Delegate of the Governing Body immediately facilitates reporting to Police.

**If concern relates to these persons – report as a reportable allegation (see above).**

**IMPORTANT INFORMATION**

Required under law *(Education (General Provisions) Act)* for schools and policy.

Note: Failure to report sexual abuse of a child by an adult to police, without having a reasonable excuse for not doing so (e.g. because the report has been made by the Principal or Nominated Supervisor) may be a criminal offence under Queensland's Criminal Code.

## CHILD MAY BE IN NEED OF PROTECTION

**DEFINITION**

A child who may have suffered significant harm, be suffering significant harm, or be at unacceptable risk of significant harm, and may not have a parent willing or able to protect them from the harm.

**REPORT IMMEDIATELY TO**

Child Safety Services

**IMPORTANT INFORMATION**

Required under law for certain professionals (e.g. teachers, nurses, ECS educators) if related to sexual or physical abuse (*Child Protection Act*). Required under policy for all abuse or neglect.

## EMERGENCY OR OTHER RISK TO A PERSON'S SAFETY

**REPORTING PATHWAY**

Follow local emergency/critical incident processes, inlcuding contacting '000' where relevant.
Additionally, a Child Safe Advocate, Principal, Approved Provider or Approved Provider's delegate, the Delegated Reporting Officer or Delegate of the Governing Body may report to Police or other appropriate entities (e.g. eSafety Commissioner).

**IMPORTANT INFORMATION**

Enabled under policy and law.

## CONCERNS THAT PROCEDURES: CHILD SAFE RESPONSES AREN'T FOLLOWED

**REPORT TO**

Owned or controlled schools/ECS: Executive Director, Anglican Schools Commission
Independent schools and their ECS: Chair of the governing body

**IMPORTANT INFORMATION**

Required under policy, and reasonable after local due diligence.

[1] Refer to the school or ECS Annexure: Child Safe Advocates and other Appropriate Persons for identifying information.

# Reportable Conduct

## Overview of a Typical Response to Reportable Conduct

### IDENTIFY AND INITIATE
STEPS 1- 3

**1 IDENTIFY A REPORTABLE MATTER**

On receiving or otherwise becoming aware of a concern, the Head of Entity identifies whether the matter involves a **Reportable Allegation or Reportable Conviction** under one of the six categories of reportable conduct.

**2 CONSULT WITH THE DELEGATE OF THE GOVERNING BODY**

The Head of Entity consults with the Delegate of the Governing Body regarding the matter and the proposed response.

**3 COMMENCE THE CHILD SAFE RESPONSE FORM**

The Head of Entity ensures that a Child Safe Response Form is commenced to document the concern and the actions taken in response.

### ASSESS RISK AND REPORT
STEPS 4 - 5

**4 COMPLETE THE INITIAL RISK ASSESSMENT**

The Head of Entity arranges for and approves an Initial Risk Assessment and any associated risk management actions. For owned/controlled schools and ECS, the Head of Entity also liaises with the Delegate of the Governing Body and provides the Anglican School Commission's (ASC) Director of Child Safety with a copy of the completed Risk Assessment. **Interim Risk Assessments are undertaken as necessary throughout the process to ensure identified risks and associated controls remain current and appropriate.**

**5 MAKE THE INITIAL REPORT TO THE QFCC**

The Head of Entity makes an Initial Report to the QFCC **within three business days of receiving the allegation**. Where practicable, the report includes a copy of the approved Initial Risk Assessment (Step 4) and, where known, details of the Investigator (Step 6). For owned/controlled schools and ECS a copy is also provided to the ASC Director of Child Safety.

Relevant matters are also reported, as required, to other authorities, including Police, the Queensland College of Teachers and, for ECS, the Early Childhood Regulatory Authority.

### PLAN AND INVESTIGATE
STEPS 6 - 11

**6 APPOINT AN INVESTIGATOR**

The Head of Entity appoints an Investigator and advises the QFCC of the appointment, if this information was not provided as part of the Initial Report at Step 5.

**7 NOTIFY THE WORKER**

In most cases, the Head of Entity provides the Worker with a Letter of Notification. To support procedural fairness and the integrity of the investigation, the letter will not usually set out the allegations in detail. The letter focuses on any conduct directions or interim arrangements and provides information about the investigation process, relevant reporting obligations and supports available to the Worker.

**8 DEVELOP AND APPROVE THE INVESTIGATION PLAN**

The Investigator prepares an Investigation Plan for approval by the Head of Entity. For owned/controlled schools and ECS, the Investigator or Head of Entity also liaises with the Delegate of the Governing Body and provides the ASC Director of Child Safety with a copy of the approved Plan.

**9 GATHER EVIDENCE AND INTERVIEW CHILDREN AND WITNESSES**

The Investigator plans, arranges and conducts interviews with the Subject Child or Children and relevant Witnesses, and gathers any other evidence relevant to the investigation.

**10 PROVIDE THE WORKER WITH THE ALLEGATIONS**

Where the allegations were not detailed in the Letter of Notification, as will commonly be the case, the Worker is provided with a Letter of Allegations. **A Letter of Allegations is the recommended approach for formally putting the allegations to the Worker** and invites the Worker to respond through an interview and/or written submission.

**11 OBTAIN THE WORKER'S RESPONSE**

The Investigator arranges and conducts an interview with the Worker and/or receives the Worker's written response to the allegations. This will generally occur approximately one week after the Letter of Allegations is provided. The Investigator may seek further information or clarification arising from the Worker's response.

# Reportable Conduct

## Overview of a Typical Response to Reportable Conduct

### REVIEW AND DETERMINE FINDINGS
STEPS 12 - 16

**12** **PREPARE THE INVESTIGATION REPORT AND PRELIMINARY FINDINGS**

The Investigator prepares a draft Investigation Report and, where there are proposed adverse findings, a Preliminary Findings Letter. These documents are reviewed and approved by the Head of Entity.

**13** **PROVIDE PRELIMINARY FINDINGS TO THE WORKER**

Where adverse findings are proposed, the Head of Entity provides the Worker with a Preliminary Findings Letter. Where appropriate, this may also operate as a show cause letter. The letter provides the Worker with a further opportunity to make submissions before findings are finalised and, where reportable conduct may be substantiated, generally advises the Worker of any relevant potential consequences, including Blue Card implications.

**14** **CONSIDER FURTHER SUBMISSIONS**

Any further submissions provided by the Worker are considered by the Investigator and the Head of Entity before the findings are finalised.

**15** **FINALISE THE INVESTIGATION REPORT AND FINDINGS**

The Investigator, in consultation with the Head of Entity, considers any further submissions and finalises the Investigation Report and findings.

**16** **COMPLETE THE FINAL RISK ASSESSMENT**

A Final Risk Assessment is completed to assess any ongoing risks and determine whether further risk management actions are required. This is in addition to any Interim Risk Assessments undertaken during the process in response to changing circumstances or identified risks.

### COMMUNICATE AND FINALISE REPORTING
STEPS 17 - 19

**17** **ADVISE THE WORKER OF THE FINAL FINDINGS**

The Head of Entity provides the Worker with a Final Findings Letter. The letter may also outline any resulting actions relating to the Worker's engagement with the school or ECS, such as professional development, formal directions or other appropriate measures.

**18** **COMMUNICATE FINDINGS TO CHILDREN AND PARENTS/CARERS**

Where appropriate, the findings and relevant outcomes may also be communicated to the subject child or children and/or their parents/carers, having regard to privacy, confidentiality and any other relevant considerations.

**19** **MAKE THE FINAL REPORT TO THE QFCC**

The Head of Entity provides the QFCC with the Investigation Report, Final Risk Assessment and all other documents relevant to the matter as part of the Final Report.

If the matter is not finalised within 30 business days of receiving the allegation, an Interim Report must also be provided to the QFCC.

For schools owned or controlled by ACSQ, and ECS for which ACSQ is the Approved Provider, copies of the Final Report and all attachments are also provided to the ASC Director of Child Safety.

### RECORD AND LEARN
STEPS 20 - 22

**20** **COMPLETE AND SECURELY RETAIN THE RECORD**

The Child Safe Response Form is finalised, with all relevant records and documents attached, and securely retained by the respective school or ECS in accordance with applicable record keeping and confidentiality requirements.

**21** **REPORT TO GOVERNANCE BODIES AND SUPPORT SYSTEMIC LEARNING**

For schools owned or controlled by ACSQ, and ECS for which ACSQ is the Approved Provider, the Director of Child Safety provides a report to the Anglican Schools Commission and the relevant School Council or ECS Management Committee. Reporting focuses on compliance status, risk themes, trends and systemic learning, with identifying information excluded unless necessary and lawful. For other schools and ECS, equivalent governance reporting by the Head of Entity is recommended.

ASC support staff and the Delegate of the Governing Body are available for consultation and support throughout the process. Where a concern relates to the Head of Entity, references to the Head of Entity in these steps are replaced by the Delegated Reporting Officer, if applicable. The Head of Entity, Delegate of the Governing Body and Delegated Reporting Officer are identified in each school or ECS Annexure 'Child Safe Advocates and other Appropriate Persons'.

Refer to the Procedures: Child Safe Responses - Section 4A Risk Reduction (pages 28 - 36), Section 4B - Concerns Related to School or ECS Operations (pages 41 - 46) and Practice Resources: Reportable Conduct Templates for further detail.

2

# Receive and Identify

Recognise | Respond | Record | Escalate

# Receive and Identify

Wherever a potential, perceived or actual concern is received or otherwise identified, these procedures are to be applied to support the assessment, reporting and management of concerns.

These procedures apply to concerns involving children attending an Anglican school or ECS, and to concerns relating to the conduct of persons who have, or may have, contact with children through their association with a school or ECS.

## Context

**CONCERN**
A concern is information where it is reasonable to suspect a child has been harmed, or placed at risk of harm, due to the behaviour of another person and the resulting or potential impact on the child's physical, emotional, psychological or cultural safety.

**REASONABLE SUSPICION**
A reasonable suspicion does not mean a concern is substantiated. Rather, it means it is reasonable for a person, with the information available to them, to suspect harm or an unacceptable risk of harm to a child.

**CHILD**
Unless explicitly stated otherwise, the term 'child' includes both children aged 0 to 18 years old and young people attending an Anglican school who have turned 18 years old.

### SOURCES OF INFORMATION

Information relevant to child safety concerns can come from any source, including disclosures from children, observations of behaviour or interactions, overheard conversations, or information received from another person.

### TYPES OF CONCERNS

Concerns may relate to current circumstances or historical matters, for example, allegations relating to a former worker, and may arise in any environment. Concerns can arise in a range of circumstances and will relate either to the safety and wellbeing of a child, or to the conduct of a person who has, or had, an association with children through a school or ECS. These concerns will generally fall into one of the following categories.

**PARENT OR CAREGIVER CONCERNS**
Concern for a child related to the behaviour (action or inaction) of a parent or caregiver (usually unrelated to the school or ECS).

**PEER-TO-PEER INTERACTIONS**
Concern arising from peer interactions, where children are known to each other through their relationship with the school or ECS.

**WORKER OR ADULT CONDUCT CONCERNS**
Concern arising from the conduct of a worker, or other adult who is reasonably expected to have had or will have contact with a child through their relationship with the school or ECS. This includes any conduct considered inappropriate, reportable allegation or reportable conviction and is not limited to conduct in the course of work.

**OTHER EXTERNAL SAFETY CONCERNS**
Concern for a child related to the behaviour of another person not covered above – where their identity is known or unknown. For example, an online identity or a person who the child has come into contact with in the broader community.

# Context

### HARM AND SAFETY

Harm is generally defined as "damage to the health, safety, or wellbeing of a child. It can be the result of abuse or neglect by an adult or the conduct of other children. It includes: physical violence; sexual abuse, grooming and sexual misconduct; emotional and psychological harm; and neglect." [1]

In some cases, harm may be of a sufficient threshold to also enliven reporting or other obligations under legislation. These obligations are often distinct and unique but generally share a common definition of what harm is.

"Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. Harm can be caused by a single act, omission, or circumstance; or a series or combination of acts, omissions or circumstances."[2]

Safety is the protection from harm and includes consideration of a child's physical, emotional, psychological and cultural safety and wellbeing. Broad definitions of safety include the following:

#### PHYSICAL SAFETY
No unreasonable, or reasonably foreseeable, risk of harm to physical development or physical health.

#### EMOTIONAL AND PSYCHOLOGICAL SAFETY
No unreasonable, or reasonably foreseeable, risk of harm to emotional or psychological development (e.g. cognitive, sexual and social development), wellbeing, mental health or psychosocial safety.

#### CULTURAL SAFETY
To feel welcome, safe, valued, included and respected[3].

# Requirements

### 1. CHILD-FOCUSED REPORTING PROCESSES

Schools and ECS are required to have child-focused processes in place so any person – whether child or adult – knows how, and are supported to, raise concerns. At minimum this includes:

- Supporting children to take with an adult they trust, highlighting the availability and role of Child Safe Advocates to receive reports from children (consistent with section 16(2)(a) of the *Education (Accreditation of Non-State Schools) Regulation 2017*).
- Enabling anyone to report concerns to an Appropriate Person, for example, where concerns relate to a worker, the ability to report to the Principal (schools) or Approved Provider (ECS) as the Head of the Entity.

The identity of Child Safe Advocates and other Appropriate Persons are detailed in each school and ECS' Annexure to these Procedures: Child Safe Responses 'Child Safe Advocates and other Appropriate Persons'.

Practice Resource: Annexure 'Child Safe Advocates and other Appropriate Persons' Template

[1] Source: Guidelines for implementing the Child Safe Standards in Queensland, Queensland Family and Child Commission, 2025
[2] Source: Section 9 Child Protection Act 1999 and section 11 of the Education (Queensland College of Teachers) Act 2005
[3] Source: Unpacking the Universal Principle - Cultural Safety in the Child Safe Standards, Queensland Family Child Commission

# Requirements

## 2. PUBLISHED REPORTING INFORMATION

Each school and ECS publishes information on how and who to contact to raise concerns, and in what relevant circumstances. From time-to-time information may be tailored as appropriate to the relevant audiences. This includes information about:

- How to contact a Child Safe Advocate for support in managing a concern
- How workers can report reasonable suspicions a child has been, or is likely to be, sexually abused by another person to the Principal (schools), Nominated Supervisor or Approved Provider (ECS), or the Delegate of the Governing Body. Note: school staff are mandated under law to make such reports
- How workers who are mandatory reporters (e.g. teachers, registered nurses and ECS professionals) can contact Child Safety Services about reportable suspicions
- How to contact the Head of Entity, usually the Principal (schools) or Approved Provider (ECS), to report reportable allegations or convictions regarding a worker
- Where reportable allegations or convictions relate to the Head of Entity, or there is a concern about the management of reportable conduct by the Head of the Entity, how to contact a Delegated Reporting Officer and the Queensland Family and Child Commission (QFCC).

*Note: Under law, workers are mandated to report reportable allegations or convictions.*

## 3. APPLYING THESE PROCEDURES

Workers are required to apply these procedures whenever a potential, perceived or actual concern is received or identified. Information can come from any source, and all workers are required to consider and appropriately respond to this information. If a person is unsure about whether to share information, then the information is to be shared. The obligation for workers to share concerns is essential due to:

- The duty of care owed to children
- Statutory reporting obligations
- Commitment to implementing Child Safe Standards and the Universal Principle.

## 4. REPORTING TO AN APPROPRIATE PERSON

Workers are required to report concerns, including those related to their own conduct, to an Appropriate Person without unnecessary delay[4] (immediately). It is the worker's responsibility to ensure the concerns have been received by the Appropriate Person. The Appropriate Person can depend on the type of concern (see Quick Reference Guide: Reporting Overview and as outlined in the Section 4B of these procedures) however, includes:

- **Schools:** A Child Safe Advocate or the Principal/Head of Entity
- **ECS:** A Child Safe Advocate, including Nominated Supervisors, or the Approved Provider/Head of Entity (including Approved Provider's representative or delegate)
- **For both schools and ECS**, in limited circumstances detailed in these procedures: the Delegate of the Governing Body or the Delegated Reporting Officer.

An Appropriate Person will apply these procedures if they receive a report of potentital, perceived or actual concern; or they otherwise receive information where it's reasonable to identify a concern.

***Note:*** *Refer to each school's or ECS' Annexure 'Child Safe Advocates and other Appropriate Persons' for other identifying information.*

Concerns can also be shared with other relevant workers to enable operational management of the school or ECS, such as meeting duty of care responsibilities.

[4] 'Without unnecessary delay' is used to help explain what is meant to by 'immediately', recognising that when caring for children there are circumstances where duty of care responsibilities to the safety, wellbeing and best interests of children is paramount.

# Requirements

## 5. VERBAL AND WRITTEN REPORTING

Staff are required to provide concerns in writing to provide an accurate record and meet mandated obligations, however, this must not impact on the timely sharing of information and management of concerns. Concerns are usually therefore reported verbally in the first instance. Where multiple staff receive concerns, they share responsibility for providing the concerns in writing.

## 6. WRITTEN REPORT REQUIREMENTS

Written reports of concern can be completed by sending an email to the relevant Appropriate Person's email address, in a manner that is secure and data is protected (e.g. via school or ECS controlled email accounts connected to secure WiFi to the authorised recipient). Schools and ECS may also provide additional ways for reports to be made, for example, through an online staff portal. Information to be included in written reports is detailed on the following page:

- EMAIL SUBJECT HEADING
  Identify email as a Child Safe Concern in the subject heading.
- WORKER DETAILS
  Name of worker/s who identified or received the concern.
- CHILD DETAILS (WHERE KNOWN)
  Each relevant child's name, sex/sex descriptor, age/DOB.
- PERSON OF CONCERN DETAILS (WHERE KNOWN)
  Details (e.g. name, sex descriptor, age and relationship) of the person suspected of abuse or causing harm or placing a child at risk of abuse/harm (the behaviour of concern).
- BEHAVIOUR OF CONCERN
  Details of the behaviour of concern and any relevant circumstances.
- IMPACT ON THE CHILD
  Details of any suspected impact (e.g. physical or psychological harm) towards the child from the behaviour of concern.
- SOURCE OF INFORMATION
  Details of how the worker became aware of the concern.
- OTHER RELEVANT PERSONS
  The identity of any other person who may be able to provide relevant information related to the concern.

## 7. CHILD SAFE RESPONSE FORM

On receiving a concern, an Appropriate Person will commence a Child Safe Response Form. The purpose of this Form is to record how the school or ECS manages the concern. Only one Child Safe Response Form is required to be completed for the concern being managed.

See Practice Resource: Child Safe Response Form

# Requirements

## 8. CONCERNS NOT MEETING THRESHOLD

**An Appropriate Person will assess whether the threshold for 'concern' has been met. In doing so, the definition of concern will be considered alongside any other relevant definition, notably the definition of sexual abuse, reportable allegations and reportable convictions.**

Caution is to be applied when making this assessment. If in doubt, progress with the Child Safe Response.

If the Appropriate Person (usually a Child Safe Advocate) assesses that a matter does not reach the threshold of a 'concern', the matter will, without unnecessary delay, be escalated to the Principal (schools), or Approved Provider (ECS), as Head of Entity, for review and approval. If the concerns relate to the Principal or Approved Provider, report to the Delegated Reporting Officer for review and approval.

The Principal (schools), Approved Provider (ECS), or Delegated Reporting Officer may determine that the matter is to be managed through school or ECS Business As Usual processes.

Where a matter is managed through Business As Usual processes, the following actions are to be undertaken by an Appropriate Person:

- RECORDING THE DECISION
  The reason for the decision will be recorded in the Child Safe Response Form.
- INFORMING STAFF
  The staff member who identified the concern will be informed of the decision and reasoning.
- BUSINESS AS USUAL (BAU) SUPPORT
  A summary of the actions taken or planned through school or ECS BAU processes will be recorded in the Child Safe Response Form.
- RECORD STORAGE
  The completed Child Safe Response Form will be securely filed.
- INTERNAL REVIEW
  The Child Safe Response Form will be included in internal review processes.
- OPTIONAL EXTERNAL REPORTING
  Workers may still choose to report the matter to Child Safety, Police or the QFCC.

# Record Keeping

Accurate and secure record keeping is essential for effective child safe responses. Schools and ECS may be required to produce records on the management of any concern, including actions taken, decisions made and responses implemented. This section outlines the requirements for commencing, storing and accessing Child Safe Response Forms and associated records.

## Requirements

### 1. COMMENCING THE CHILD SAFE RESPONSE FORM

On receiving a concern, an Appropriate Person will commence a Child Safe Response Form. The purpose of this Form is to record how the school or ECS manages the concern. Only one Child Safe Response Form is required to be completed for the concern being managed. The Child Safe Response Form template can be integrated into the school or ECS record keeping systems.

### 2. STORING AND ACCESSING RECORDS

The Child Safe Response Form, as well as any relevant records to include (e.g. emails), will be securely stored by the Appropriate Person in a manner that is accessible if:

- A record is being sought for any of the persons directly involved in the concern (child or person potentially responsible), either while they are still engaged with the school or ECS or afterward, or
- A record is being sought based on the timeframe or type (e.g. concerns related to worker conduct managed by the school or ECS within a particular time period).

### 3. RECORD KEEPING SYSTEMS

The Principal (schools), or Approved Provider (ECS), as Head of Entity, along with the Nominated Supervisor (ECS) are responsible for ensuring record keeping systems are in place and are being used.

3

# Gather Information

Gather | Assess | Document | Share

# Gather Information

When a concern is identified, information will be gathered to support an informed assessment of the circumstances and enable effective responses. Information gathering is an ongoing process that assists schools and ECS to understand concerns, assess potential risks to children, determine relevant obligations, and identify appropriate next steps.

Throughout this process, consideration must be given to the safety and wellbeing of children, minimising unnecessary repeated disclosures, and any directions provided by statutory authorities.

The following requirements outline how schools and ECS gather, record, assess and share information to support effective child safe responses.

## Requirements

### 1. GATHERING RELEVANT INFORMATION

An Appropriate Person who receives the concern will arrange for information to be gathered to inform the assessment and response to the concerns raised. This may include consideration of the concerns identified, information the school or ECS already has or can reasonably obtain, and any new information that becomes available as the matter progresses.

Concerns related to school or ECS operations, including those related to possible reportable conduct, are escalated to the Principal (schools), or Approved Provider (ECS), as Head of Entity[5], for direction, prior to further information gathering, assessment and response (see Section 4B of these procedures).

Actions taken to gather information will be mindful of any potential impact on the effective response to the concerns, such as impacting an investigation.

Information may be gathered from a range of sources, including discussions with relevant persons such as children, current or past teachers, parents and Police, as well as review of school or ECS records, including previous Child Safe Response Forms (or equivalent) and other relevant notes.

### 2. RECORDING INFORMATION

The Appropriate Person will record relevant information on the Child Safe Response Form or an attached document.

### 3. WHEN INFORMATION GATHERING STOPS

The school or ECS will stop gathering information:

- When enough information is known to respond to the concerns effectively
- To avoid the need for unnecessary repeating of disclosures
- Whilst contact is made to Police, Child Safety and/or other relevant statutory authority to seek their view on the appropriateness of gathering further information at that time. Statutory authorities may at times request actions be limited or mindful of considerations, to reduce impact on their investigations. Actions necessary for the safety of children are always prioritised.

### 4. SHARING RELEVANT INFORMATION

Information gathered is to be shared when necessary to enable an effective response to the concerns, including when assisting workers to make decisions regarding:

- Reporting obligations to Child Safety
- Reporting obligations regarding sexual abuse or likely sexual abuse
- Reporting obligations regarding reportable allegations or convictions.

[5] If the concerns relate to the Head of Entity, report to the Delegated Reporting Officer.

# Requirements

## 5. CONCERNS NOT MEETING THRESHOLD

**During the gathering of information, an Appropriate Person will assess whether the threshold for 'concern' has been met. In doing so, the definition of concern will be considered alongside any other relevant definition, notably the definition of sexual abuse, reportable allegations and reportable convictions.**

Caution is to be applied when making this assessment. If in doubt, progress with the Child Safe Response.

If the Appropriate Person (usually a Child Safe Advocate) assesses that a matter does not reach the threshold of a 'concern', the matter will, without unnecessary delay, be escalated to the Principal (schools), or Approved Provider (ECS), as Head of Entity, for review and approval. If the concerns relate to the Principal or Approved Provider, report to the Delegated Reporting Officer for review and approval.

The Principal (schools), Approved Provider (ECS), or Delegated Reporting Officer may determine that the matter is to be managed through school or ECS Business As Usual processes.

Where a matter is managed through Business As Usual processes, the following actions are to be undertaken by an Appropriate Person:

- RECORDING THE DECISION
  The reason for the decision will be recorded in the Child Safe Response Form.
- INFORMING STAFF
  The staff member who identified the concern will be informed of the decision and reasoning.
- BUSINESS AS USUAL (BAU) SUPPORT
  A summary of the actions taken or planned through school or ECS BAU processes will be recorded in the Child Safe Response Form.
- RECORD STORAGE
  The completed Child Safe Response Form will be securely filed.
- INTERNAL REVIEW
  The Child Safe Response Form will be included in internal review processes.
- OPTIONAL EXTERNAL REPORTING
  Workers may still choose to report the matter to Child Safety, Police or the QFCC.

4

# Assess and Respond

Assess | Protect | Respond | Investigate

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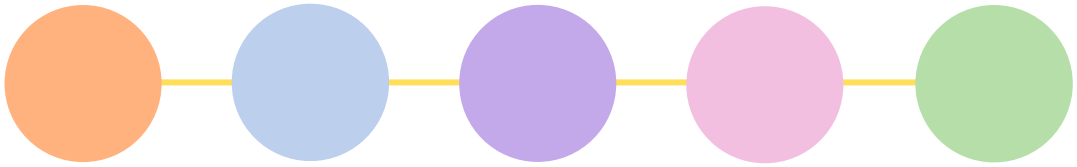
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4A

# Assess and Respond: Risk Reduction

# Undertaking Responses and Investigations

Risk management is a proactive process that enables schools and ECS to identify risks and reduce the likelihood or severity of adverse circumstances. Within these procedures, actions to reduce risk are primarily focused on maintaining physically, emotionally, psychologically and culturally safe environments for children, while supporting children who have been, or may be at risk of being, harmed in any environment.

Schools and ECS have a positive duty to ensure the safety of children and protect them from risks arising from their operations. This includes identifying reasonably foreseeable risks, eliminating risks where reasonably practicable, and implementing, maintaining and reviewing effective risk control measures where risks cannot be fully eliminated.

## Context

The following summary outlines the overarching responsibilities relevant to risk management and child safe responses within schools and ECS. Schools, ECS and external authorities share responsibility for coordinating decision making and the delivery of services to relevant children and their families.

### GENERAL RESPONSIBILITIES

- Everyone is responsible for acting lawfully, reasonably and in good faith.
- The child's family has primary responsibility for the child's upbringing, protection and development. Schools and ECS work safely and lawfully to support partnerships with parents and families.
- Schools and ECS are responsible for taking steps, as far as reasonably able in the circumstances, to protect children from physical and psychological harm and provide physically, emotionally, psychologically and culturally safe care. As Reporting Entities, schools and ECS are responsible for effectively responding to reportable allegations and convictions related to workers.
- Under section 229BB of the *Criminal Code Act 1899,* adults in positions of power or responsibility within institutions (including schools and ECS) are required to take reasonable steps to reduce or remove the risk of child sexual offences being committed against children in their care. A failure to take such reasonable steps may consitute a criminal offence.

### STATUTORY AND REGULATORY AUTHORITIES

- **Child Safety Services** are responsible where there is not a parent able and willing to protect the child. Child Safety Services receive notifications and, where necessary, lead investigations into children's need for protection.
- **Police** are responsible for responding to immediate danger and undertaking criminal investigations.
- **Queensland Family and Child Commission (QFCC)** are responsible for oversight of the Child Safe Standards, the Universal Principle and the Reportable Conduct Scheme, including capacity building, compliance and associated legislative powers.
- **Queensland College of Teachers** are responsible for teacher registration, along with oversight of, and where appropriate investigations into, teacher conduct.
- **Blue Card Services** are responsible for issuing and monitoring Working with Children Authorities (Blue Cards), including oversight of this system.
- **Department of Education** are responsible for oversight of ECS as the Early Childhood Regulatory Authority.
- **Non-State Schools Accreditation Board** is responsible for oversight and approval of non-State schools to operate.

# Requirements

## 1. REDUCING RISK OF HARM

Both whenever a school or ECS identifies a concern, and when new information about that concern is obtained, Appropriate Persons involved ensure consideration is given to what can be reasonably and lawfully done to reduce the risk of harm.

## 2. COMMUNICATION AND CONSULTATION

Throughout the process, consideration will be given to who is appropriate to communicate and consult with, to optimise effectiveness and appropriate oversight of actions to reduce risk.

## 3. TARGETED RISK MANAGEMENT ACTIONS

Risk management actions will, relevant to the concerns, be targeted at the following:

- THE CARE ENVIRONMENT
  For example, when a child is in the school or ECS care, control, supervision or authority, all actions reasonable to take to reduce the likelihood and severity of both physical or psychological harm to the child.
- THE ALLEGED PERSON RESPONSIBLE
  For example, all actions reasonable to take to reduce the likelihood of this person causing physical or psychological harm to the child into the future.
- THE CHILD
  For example, all actions reasonable to take to support the child to reduce the impact of these concerns on their physical, emotional, psychological or cultural safety.

## 4. DOCUMENTING RISK MANAGEMENT ACTIONS

Risk management actions will be documented in the Child Safe Response Form, or an attached document.

In addition to the Child Safe Response Form, risk assessment templates are provided for use in relevant circumstances (see **Practice Resources**).

Additional information on a school or ECS responsibilities to manage risk is detailed in the Compliance Support Index, published alongside the Child Safe Anglican Education Policy.

# Concerns Related to School or ECS Operations

## Context

### MANAGING OPERATIONAL SAFETY CONCERNS

Concerns related to school or ECS operations (including any business or group operating under the authority for control of the school or ECS) may arise from peer interactions where children are known to each other through their relationship with the school or ECS, or from the conduct of a worker, or other adult who is reasonably suspected to have had or may have contact with a child through their relationship with the school or ECS. This includes conduct considered inappropriate, reportable allegations or convictions and is not limited to conduct occurring in the course of work.

Responses related to, or impacting on, operational safety are focused on understanding and managing risks to children who may be impacted by the behaviour of concern, including where relevant, child conduct. These responses may occur concurrently with the application of school or ECS behavioural or performance management processes.

Where concerns relate to the conduct of workers, the following processes also support the school or ECS responsibilities as Reporting Entities under the Reportable Conduct Scheme. This includes assessing and managing risk, conducting fair and thorough investigations, and maintaining transparent oversight of matters affecting children's safety.

## Requirements

### 1. RESPONDING TO CONCERNS

The Appropriate Person will ensure concerns raised about operational safety are reviewed and investigated where appropriate.

This involves the following persons determining what actions are appropriate:

- The **Principal** (schools) or **Approved Provider** (ECS), as Head of Entity
- In the case of **concerns about the Head of Entity**, the **Delegated Reporting Officer** identified in Annexure A of the Child Safe Anglican Education Policy, being a person who is not subject to the authority of the person under allegation.

The Appropriate Person may also be supported by Child Safe Advocates or other relevant staff. The Appropriate Person is also required (as per the policy and Section 4B of these procedures) to facilitate these concerns being shared with the Delegate of the Governing Body.

An appropriate response is one that demonstrates integrity and would stand up to external scrutiny. This response may involve an internal process that gathers relevant information to inform decision making, or referral to a third party such as an external investigator or advisor.

School or ECS actions or processes may be placed on hold at times, for example where statutory authorities, such as Police, are investigating.

## Requirements

### 2. RESPONSE PLANNING OBLIGATIONS

Response planning will consider all relevant obligations, including reporting, risk management, safety and wellbeing responsibilities, and employment law.

### 3. APPLYING REPORTABLE CONDUCT PROCESSES

Where a matter involves conduct that may amount to a reportable allegation or conviction under the Reportable Conduct Scheme, the following risk management and investigative processes apply, along with the information on reporting matters as part of the Reportable Conduct Scheme, in the section 4B of these Procedures.

### 4. APPLYING QFCC GUIDANCE

Persons responsible for responding to reportable conduct will do so in accordance with the QFCC's Guide to Queensland's Reportable Conduct Scheme.

### 5. BROADER APPLICATION OF PROCESSES

The following risk management and investigation processes may be adopted to respond to other concerns impacting operational safety, eg. peer to peer interactions.

# Risk Management

Risk management involves identifying hazards, assessing the likelihood of occurrence and potential harm that may arise, and taking reasonable and proportionate actions to eliminate, or where not possible minimise the associated risk as far as reasonably practicable. The level of assessed risk will determine what steps are taken, while applying procedural fairness to the impacted worker (alleged person of concern) and seeking to protect the integrity of the investigation. Keeping children safe remains paramount.

See Practice Resources: Assessment, Safety and Support Planning Resources for risk assessment templates, especially the Reportable Conduct Risk Assessment Template.

## Requirements

### 1. MANAGING RISKS THROUGHOUT INVESTIGATIONS

Once a school or ECS is aware of a relevant concern, the Head of Entity (usually Principal for schools and Approved Provider for ECS) must identify, assess and manage risks immediately and throughout the investigation process.

This may include, without limitation:

**A**

#### Proportionate Risk Management Actions

Taking risk management action that is proportionate to the assessed level of risk, prioritising the safety, wellbeing and best interests of children. Actions required are:

- Selecting the appropriate level of intervention required to manage identified risks
- Documenting the reasons
- Reviewing as new information becomes available

**B**

#### Interim Risk Assessments

Further interim assessments being undertaken when:

- New information becomes available
- On advice of the Police or QFCC
- A decision is made to not commence, pause, or end an investigation due to a request from the Police or QFCC
- There are changes to organisational circumstances, such as staffing

**C**

#### Immediate and Interim Risk Management Actions

Immediate and interim risk management actions are informed by the documented assessment of all available and relevant information, identified risks, consideration of relevant factors and proportionate responses. The following considerations form part of this requirement and are applied together when determining and implementing an appropriate response.

*Continued on the next page*

# Requirements

## 1. MANAGING RISKS THROUGHOUT INVESTIGATIONS (CONTINUED)

C

### Immediate and Interim Risk Management Actions (Continued)

**RISK AREAS TO ASSESS**

Assessments are to identify risks relating to:

- The child or children involved
- Other children or young people
- The worker (alleged person of concern)
- Families and caregivers
- Adult witnesses and other adults who are reasonable to identify as significantly impacted, such as those who received a disclosure
- Other statutory investigations (e.g. Police, Child Safety Services, sector regulators)
- Cultural safety and accessibility (e.g. need for inclusive practices that recognise diverse cultural needs)
- Digital and information-based risks (e.g. access)

**FACTORS TO CONSIDER**

When assessing risk and determining appropriate actions, consideration is to be given to:

- The nature and seriousness of the allegation
- The worker's (alleged person of concern) access to children (e.g. physical, online, relational)
- Whether there is a pattern of behaviour with any previous indicators or concerns (including grooming)
- Environmental factors, such as supervision levels, environment, or staffing model
- The child or children's vulnerability, including disability, age, cultural considerations, or trauma history
- Whether Police involvement is required (refer to section 4B of these procedures), and any advice from the Police, particularly regarding evidence preservation
- Human rights considerations relevant to all involved
- Risks arising from domestic and family violence

**ENSURING RISK MANAGEMENT ACTIONS**

Prioritise children's safety and wellbeing, considering:

- Support for children, and their families/caregivers
- Minimising further exposure to risk
- Appropriately informing children, parents/carers throughout an investigation process, including the actions taken to support the child's immediate safety and wellbeing (unless doing so places a person at greater risk or compromises an investigation)
- Trauma informed communication (communicating in ways that recognises the impact of trauma, avoids causing further harm, and promotes safety, respect and trust)
- Accessibility and cultural safety

*Continued on the next page*

# Requirements

## 1. MANAGING RISKS THROUGHOUT INVESTIGATIONS (CONTINUED)

C

### Immediate and Interim Risk Management Actions (Continued)

Reflect the safety and wellbeing needs of children (most importantly), along with (as far as is appropriate in the circumstances) the worker and others impacted, such as witnesses or those receiving disclosures, considering:

- Whether the worker (alleged person of concern) should remain in their current position, be relocated or suspended, or if remaining in the workplace (usually the school or ECS), what duties or activities they will undertake and who will monitor and assess any associated risks.
- Appropriate information sharing
- Type of support, such as counselling or a support person

## 2. FINAL RISK ASSESSMENT FOLLOWING INVESTIGATIONS

Once an investigation is complete, a final risk assessment must be undertaken and, for reportable conduct, relevant risk management actions reported to the QFCC (see section 4B of these procedures).

The final risk assessment is to consider:

- The child or children and relevant family members/caregivers, including counselling, ongoing support needed, or future contact with the worker (alleged person of concern)
- The worker (alleged person of concern), including any support, training, disciplinary or conduct management action required
- Organisational culture and expectations, including in relation to improved education and awareness regarding safety and wellbeing
- Systems and processes, including any work practices or gaps that contributed to the reportable allegation or reportable conviction (behaviour of concern), including missed opportunities for early detection
- Policies and procedures, including consideration of any refinement needed

# Investigations into Reportable Conduct

## Context

**REPORTABLE ALLEGATIONS**
Allegations or other information that leads a person to form a reasonable belief that a worker of a Reporting Entity has committed reportable conduct, or misconduct that may involve Reportable Conduct.

**REPORTABLE CONVICTIONS**
A conviction of an offence committed by a worker against a law of a state or the Commonwealth that may involve reportable conduct.

For reportable conduct matters, a worker includes a former worker where the reportable allegation or conviction occurred during the time the worker was performing work for the Reporting Entity (usually the school or ECS), unless the alleged conduct occurred prior to the commencement of the Reportable Conduct Scheme on 1 July 2026.

Allegations of reportable conduct require investigation to determine what occurred, whereas investigations into convictions are focused on confirming the existence and relevance of a conviction, rather than re-examining court findings. Both types of investigations focus on assessing risks associated with the worker's current role, duties and level of contact with children.

For each school or ECS, the positions identified as the Head of Entity, Approved Provider (including Approved Provider representative or delegate), Delegated Reporting Officer and Delegate of the Governing Body are detailed in Annexure A of the Child Safe Anglican Education Policy. The Head of Entity is usually the Principal (schools) or Approved Provider (ECS).

See Practice Resources: Reportable Conduct templates
See external Practice Resource: ISQ Reportable Conduct Templates (Letters and Scripts)

Also refer to **Quick Reference Guide: Overview of a Typical Response to Reportable Conduct**

## Requirements

### 1. COMMENCING REPORTABLE CONDUCT INVESTIGATIONS

The Head of Entity must ensure that an investigation is commenced as soon as practicable after becoming aware of a reportable allegation or conviction relating to a worker of the Entity.

At this time, the QFCC must be notified that an investigation is being conducted including the contact details for a person the QFCC may contact in relation to the investigation – refer to Section 4B of these procedures.

### 2. CONDUCTING INVESTIGATIONS INTO REPORTABLE CONDUCT

The investigation required in any particular case will be assessed and determined by the Head of Entity (or in the case of allegations about the Head of Entity, the Delegated Reporting Officer).

Without limiting what investigative steps might be applied, the following guidance may be implemented by the Head of Entity (or Delegated Reporting Officer).

The following sections should be read and applied together when conducting investigations into reportable conduct.

# Requirements

## 2. CONDUCTING INVESTIGATIONS INTO REPORTABLE CONDUCT (CONTINUED)

### A DETERMINING THE INVESTIGATOR

When determining who will undertake an investigation, consideration should be given to:

**INVESTIGATOR ROLE**
Gathering relevant evidence, assessing evidence, establishing facts and making findings.

**DECISION-MAKING SEPARATION**
Separating the investigation from ultimate decision making.

**CONFLICT OF INTEREST**
Including any actual or perceived conflict of interest.

**RESOURCES**
The resources required to conduct the investigation within a reasonable timeframe.

**SKILLS**
The skills required to conduct the investigation.

### B INVESTIGATION PLANNING

Arrange for an investigation plan to be formulated (usually by the investigator) that carefully considers how evidence will be gathered in an appropriate way, seeking to establish facts, make findings and determine actions to be taken.

### C MAINTAINING INVESTIGATION INTEGRITY

Throughout the investigation, monitor and mitigate risks to the integrity of the investigation.

### D CONDUCTING FAIR AND CHILD-CENTRED INVESTIGATIONS

Arrange for the investigation to occur in a manner that, unless doing so would be inappropriate (for example, where Police direct that an investigation is paused or not commenced), is:

**TIMELY, FAIR AND CHILD-CENTRED**
The investigation is conducted in a timely, fair and child-centred manner.

**PROCEDURALLY FAIR**
Procedural fairness is provided to the worker.

**RISK INFORMED**
The Head of Entity is kept informed of information that impacts the risk assessment.

**ACCURATELY DOCUMENTED**
Accurate records are maintained throughout the investigation.

**CONSISTENT WITH QFCC GUIDANCE**
Relevant QFCC guidance on investigations is applied.

**COMPLIANT WITH REPORTING OBLIGATIONS**
The investigation supports all required reporting to the QFCC and other statutory authorities, including Police. See Section 4B of these procedures.

### E COMMUNICATION DURING INVESTIGATIONS

Arrange appropriate communication regarding the progress of an investigation with children, families and workers that are impacted by the investigation in a way that ensures the integrity of the process, and ensures safety, as far as is reasonably practicable. This includes the worker (person of concern) being provided with a letter of allegation (one week before where possible) that clearly tells the worker about the details of the allegations made against them.

# Requirements

## 2. CONDUCTING INVESTIGATIONS INTO REPORTABLE CONDUCT (CONTINUED)

### F PROCEDURAL FAIRNESS AND SHOW CAUSE PROCESSES

Before finalising an investigation, where there are any adverse findings, provide the worker with written notice of proposed findings and enable the worker to provide a written submission about the proposed findings within a reasonably stated period if they elect to do so.

This notice, commonly referred to as a letter of show cause, is to clearly communicate the proposed findings and relevant implications, including the matters outlined below:

**PROPOSED FINDINGS**
Clearly sets out the proposed findings of each allegation, with sufficient information so the worker can respond.

**BLUE CARD IMPLICATIONS**
Advises the worker that a substantiated finding is reported by the QFCC to Blue Card Services and may trigger reassessment of their eligibility to hold a Working with Children Authority (Blue Card).

### G CONSIDERING WORKER SUBMISSIONS

Ensure any written submissions provided by the worker in response to the proposed findings are considered in preparing a final report and a copy of submissions are provided to the QFCC.

### H COMMUNICATING INVESTIGATION OUTCOMES

Arrange for investigation outcomes to be appropriately communicated. The communication required will vary depending on the circumstances of the matter; however, the following provides guidance regarding common communication responsibilities:

**WORKER NOTIFICATION**
Must notify the worker of the final findings and any employment or disciplinary decisions.

**CHILDREN AND FAMILIES**
May inform a child subject to the allegations and/or their parent or guardian of the progress and findings of an investigation.

**ORGANISATIONAL COMMUNICATION**
May inform relevant staff about changes to practice, supervision or organisational procedures.

# Requirements

## 2. CONDUCTING INVESTIGATIONS INTO REPORTABLE CONDUCT (CONTINUED)

I

### IMPLEMENTING OUTCOMES AND CONTINUOUS IMPROVEMENT

Implement the outcomes and related actions from the investigation and pursue continuous improvement. Without limitation, this may include the following:

#### CHILD SAFE RESPONSE AND BAU ACTIONS

*As part of the Child Safe Response, in collaboration with other BAU functions such as pastoral care supports and performance management processes:*

**CHILD SAFETY AND WELLBEING ACTIONS**
Ongoing safety and support planning for children, and counselling for children, families and others affected.

**EMPLOYMENT OR ENGAGEMENT ACTIONS**
Disciplinary action, changes to duties, supervision requirements, training or termination.

**SAFETY AND PROCESS IMPROVEMENT OUTCOMES**
Changes to policy, process, onboarding or training.

**STATUTORY NOTIFICATIONS**
Notification to sector regulators and professional registration bodies where applicable.

**MONITORING AND EVALUATION**
Monitoring and evaluation of whether implemented changes have effectively reduced related risks.

#### INTERNAL REVIEW PROCESSES

*As part of the Internal Review process (Procedures: Child Safe Operations):*

**CONTRIBUTING FACTORS REVIEW**
Review of contributing or potential contributing factors.

**DATA AND TRENDS REVIEW**
Review of data and trends.

**RECOMMENDATIONS FOR IMPROVEMENT**
Recommendations for updates to policies, training, supervision, environmental design, safety practices (including cultural safety), and processes to strengthen reporting pathways and staff capability.

#### CHILD SAFE COMMITTEE RESPONSIBILITIES

*As part of the work of the Child Safe Committee (Procedures: Child Safe Operations):*

**SYSTEMS AND PRACTICE IMPROVEMENTS**
Implementing systems or practice improvements, including updates to policies, changes to environments, supervision or recruitment processes, or cultural safety practices.

**EVALUATION OF OUTCOMES**
Evaluating whether implemented changes have systemically reduced risks to children.

## 3. REPORTING TO THE QFCC

Refer to the Reportable Conduct content in the section 4B of these procedures for reporting requirements. The Head of Entity is responsible for preparing, or having prepared, and providing reports to the QFCC. This includes an initial report within 3 business days of becoming aware of the reportable allegation or conviction, an interim report if the investigation is not complete within 30 business days, and a final investigation report as soon as practicable following completion of the investigation.

4B

# Assess and Respond:

# Reporting

Reporting | Escalation | Action | Oversight

# Reporting

Often reporting responses involve multiple pathways depending on the nature of the concern. In some cases, concerns may not reach the threshold for reporting to anyone other than a Child Safe Advocate or other Appropriate Person. In these circumstances, the Appropriate Person completes a Child Safe Response Form detailing the action and decisions made.

Refer to Quick Reference Guides and Section 2 of these procedures for further context.


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# Internal Reporting Requirements

## Context

**Concerns related to school or ECS operations may arise from peer interactions where children are known to each other through their relationship with the school or ECS, or from the conduct of a worker or other adult who is reasonably suspected to have had, or may have, contact with a child through their relationship with the school or ECS.** This includes reportable allegations or convictions and is not limited to conduct occurring in the course of work (Reportable Conduct).

The following requirements apply to the internal reporting and management of these concerns.

## Requirements

### 1. REPORTING

Workers who receive or identify the concern and any Child Safe Advocate who is informed of the concern all share responsibility for reporting. Possible, perceived or actual concerns related to school or ECS operations must be reported without unnecessary delay (immediately).

**A**

#### REPORTING PATHWAYS

**SCHOOLS**

To the Principal as Head of Entity and, where the definition of concern is assessed as being met, the Delegate of the Governing Body. Where the concern is reported to the Principal, they are responsible for ensuring the Delegate is informed, within one business day.

**ECS**

To the Nominated Supervisor (unless the concern directly relates to them) and the Approved Provider as Head of Entity, and where the definition of concern is assessed as being met, the Delegate of the Governing Body. Where the concern is reported to the Nominated Supervisor, they share responsibility with the worker for ensuring the Approved Provider is informed and take shared responsibility with the Approved Provider (including their representative or delegate) for reporting to the Delegate of the Governing Body, within one business day.

**DELEGATED REPORTING OFFICER**

Where a concern relates to the conduct of a Head of Entity (usually the Principal or Approved Provider), a report is made to the Delegated Reporting Officer identified in Annexure A of the Child Safe Anglican Education Policy and outlined in the school or ECS Annexure: Child Safe Advocates and other Appropriate Persons. The Delegated Reporting Officer is responsible for the functions of the Head of Entity in respect of that conduct, including reporting to the QFCC.

**B**

#### GOOD FAITH REPORTING

A person will not be criticised for reporting concerns in good faith. If unsure, the report is to be made. For further information on how to report refer to Section 2 of these procedures.

**C**

#### GOVERNANCE ROLE REMINDERS

Reminder: For each school or ECS, the positions identified as the Head of Entity, Approved Provider (including the Approved Provider's representative or delegate), Delegated Reporting Officer and Delegate of the Governing Body are detailed in Annexure A of the Child Safe Anglican Education Policy and outlined in the school or ECS Annexure: Child Safe Advocates and other Appropriate Persons.

# Requirements

## 2. OVERSIGHT AND DECISION MAKING

To assist in the successful management of the matter, the Delegate of the Governing Body supports the Head of Entity in the areas outlined below.

### STATUTORY REPORTING OBLIGATIONS

Determine whether the matter reaches the threshold for statutory reporting obligations, including but not limited to reportable conduct.

### ADDITIONAL INFORMATION AND ADVICE

Determine appropriate additional actions, such as further information gathering or seeking specialist advice to inform related decision making.

### RESPONSE AND INVESTIGATION PLANNING

Decide on appropriate actions, including, but not limited to, risk assessment and mitigation, and how an investigation will be undertaken.

### OTHER REQUIRED NOTIFICATIONS

Ensure any other required notifications are made, as appropriate to the nature of the matter. Examples are provided below.

Depending on the nature of the matter, additional notifications may also be required. Common examples of notifications that may need to be considered are outlined below.

### INSURANCE NOTIFICATIONS

Notification to School or ECS insurers, or the insurer's representative

### CHURCH NOTIFICATIONS

Notification to the Bishop or Archbishop where concerns relate to a Licensed Person or Clergy, and to the Office of Safe Ministry where a person is a Church Worker who is not exempt from the Professional Standards Canon

### LEGAL CLAIM NOTIFICATIONS

Notification relating to matters under the National Redress Scheme, *Personal Injuries Proceedings Act 2002* (PIPA), or other legal claims

# Requirements

## 3. REPORTING TO THE GOVERNING BODY'S DELEGATE AND GOVERNING BODY

Whilst the Head of Entity retains responsibility for determining what actions are appropriate, as detailed in Requirement 1, they are also responsible for reporting the matter to the Delegate of the Governing Body within one business day of receiving the concerns. This reporting can occur through telephone, email correspondence or similar.

In addition to reporting, all concerns impacting operations (peer or adult conduct) where the matter reaches the threshold of reportable conduct, the following applies to schools owned or controlled by the ACSQ and ECS where ACSQ is the Approved Provider: the Head of Entity is required, without unnecessary delay, to provide the ASC's Director of Child Safety with the following documents as they are produced.

| DOCUMENT | TIMEFRAME | PAGE NO. |
|---|---|---|
| Initial Risk Assessment and (if made) any Interim Risk Assessments | • On receiving the concerns<br>• As required | Page 30 |
| Initial Report to the QFCC | • Within 3 business days of receiving concerns | Page 43 |
| Investigation Plan | • Prior to commencing the investigation | Page 34 |
| Investigation Report | • On completion of investigation | Page 33-36 |
| Final Risk Assessment | • On completion of investigation | Page 32 |
| The Final Report, and (if made) any Interim Reports (required within 3 business day to the QFCC | • On completion of investigation<br>• Required within 30 business days of receiving the concerns | Page 43 |
| Any correspondence from the QFCC outside of standard acknowledgements of receipt. | • As required | Page 43 |

In addition to this, the Director will brief the Executive Director on each matter in a timely way, including the school or ECS' progress with the management of each matter.

As a reminder, the ASC has staff available for schools and ECS to consult with on the application and implementation of these procedures. As example, this includes specialists in child safety, education and care, and human resource management. This is to occur whenever reasonable to enable effective implementation of requirements.

### REPORTING TO GOVERNING BODIES

For schools owned or controlled by the ACSQ and ECS where ACSQ is the Approved Provider, the Director of Child Safety will provide a report to the Anglican Schools Commission and the relevant School Council or ECS Management Committee. This reporting will emphasise compliance status, risk themes and systemic learning, with identifying details excluded unless necessary and lawful. This reporting is recommended for other schools/ECS to be completed by the Head of Entity.

# Reportable Conduct

## Context

Reportable conduct relates to concerns about a worker where the following applies:

- REPORTABLE ALLEGATIONS
  Allegations or other information that leads a person to form a reasonable belief that a worker of a Reporting Entity has committed reportable conduct, or misconduct that may involve Reportable Conduct.
- REPORTABLE CONVICTIONS
  A conviction of an offence committed by a worker against a law of a state or the Commonwealth that may involve reportable conduct.

A reasonable belief does not require certainty, proof or substantiation of the allegation. It is sufficient that a fair-minded and ordinary person, with the same information, would believe the conduct may have occurred.

For reportable conduct, a worker includes a former worker where the reportable allegation or conviction occurred during the time the worker was performing work for the Reporting Entity (usually the school or ECS), unless the alleged conduct occurred prior to the commencement of the Reportable Conduct Scheme on 1 July 2026.

It is irrelevant if the reportable conduct occurred whilst the worker was performing work for the Reporting Entity. For example, it may occur while the worker is off duty or out of hours, including in their own home.

Reportable conduct may be one act or a series of acts or incidents.

Any relevant child is an individual under 18 years of age at the time of the conduct.

### TYPES OF REPORTABLE CONDUCT

- CHILD SEXUAL OFFENCE
  Child sexual abuse offences in all forms, including grooming, online child sexual exploitation material, and offences of a sexual nature committed in the presence of a child.
- SEXUAL MISCONDUCT TO OR IN THE PRESENCE OF A CHILD
  Sexual misconduct committed in relation to, or in the presence of a child including conduct that is sexual in nature, however, may not be an offence, including, as example, inappropriate touching, voyeurism, or the use of sexual language or conversations without a legitimate reason.
- ILL-TREATMENT OF A CHILD
  Conduct that is unreasonable and seriously inappropriate, improper, inhuman or cruel, including, as example, making excessive or degrading demands, a pattern of hostile or degrading comments or behaviour, or using inappropriate forms of behaviour management.
- SIGNIFICANT NEGLECT OF A CHILD
  The deliberate or reckless failure to meet the basic needs of the child.
- PHYSICAL VIOLENCE TO OR IN THE PRESENCE OF A CHILD
  The intentional or reckless application of physical force, or an act that anticipates immediate violence (for example threats), towards a person. It does not include the application of trivial, negligible or insignificant physical force, or acts with lawful justification of excuse.
- BEHAVIOUR THAT CAUSES SIGNIFICANT EMOTIONAL OR PSYCHOLOGICAL HARM
  Behaviour causing significant detriment to a child's emotional or psychological wellbeing or development.

### ADDITIONAL GUIDANCE

Reportable conduct does not include conduct that is reasonable for the discipline, management or care of a child having regard to the characteristics of the child, including the age, developmental stage and health of the child; and any code of conduct or professional standard applying to the conduct.

Managing a matter as reportable conduct does not replace other reporting obligations to Police or sector regulators, including the Queensland College of Teachers or Department of Education (for ECS), as outlined elsewhere in section 4B of these procedures.

## Context

For processes relating to risk assessments and investigations, refer to Section 4A of these procedures. If concerns relate to a registered professional, consider the need to report to their respective statutory authority, e.g. refer to Concerns Related to an Approved Teacher or a Health Practitioner in Section 4B of these procedures. Also refer to Quick Reference Guide: Overview of a Typical Response to Reportable Conduct

### QFCC GUIDANCE AND SUPPORT

The QFCC provides additional guidance through the Guide to Queensland's Reportable Conduct Scheme, including information on reportable conduct, the definition of a worker (including former workers), historical conduct matters, and workers who operate across multiple Reporting Entities.

These guidelines are publicly available and will be applied by the Head of Entity or Delegated Reporting Officer and any investigator, in managing concerns. Workers may also report directly to the QFCC directly, for example where concerns exist regarding delays or barriers within the Reporting Entity.

### ROLE REMINDER

For each school or ECS, the positions identified as the Head of Entity, Approved Provider (including Approved Provider representative or delegate), Delegated Reporting Officer and Delegate of the Governing Body are detailed in Annexure A of the Child Safe Anglican Education Policy. The Head of Entity is usually the Principal (schools) or Approved Provider (ECS). Each school and ECS also publishes their own Annexure 'Child Safe Advocates and Appropriate Persons'.

## Requirements

### 1. REPORTING SYSTEMS

The Head of Entity is required to establish systems that enable any person to report reportable allegations or convictions about a worker, including a former worker, to the Head of Entity, the Delegated Reporting Officer and the QFCC. This is referred to as a report about reportable conduct.

### 2. REPORTING RESPONSIBILITIES OF WORKERS

Unless a worker has a reasonable belief that another person has already notified the Head of Entity or Delegated Reporting Officer, all workers must report reportable allegations or convictions to the Head of Entity. Where the concerns relate to the Head of Entity, reports are instead made to the Delegated Reporting Officer.

Workers may also report matters directly to the QFCC at any time. Reporting to the QFCC may occur with the assistance of, or be facilitated by, the Delegated Reporting Officer. In these circumstances, the Delegated Reporting Officer assumes the role of the Head of Entity in the receiving, management and reporting of the concerns.

### 3. REPORTING CRIMINAL CONDUCT TO POLICE

If a reportable allegation relates to criminal conduct, or suspected criminal conduct, the Head of Entity must report the conduct to Police at the earliest opportunity, consistent with section 25 of the *Child Safe Organisations Act 2024.*

This obligation may overlap with reporting responsibilities relating to sexual abuse or likely sexual abuse, as detailed elsewhere in section 4B of these procedures.

### 4. REPORTING TO THE QFCC

Unless the Head of Entity has a reasonable belief that another person has already notified the QFCC, the Head of Entity will undertake the following reporting to the QFCC. Reports are made to the QFCC by the Head of Entity or Delegated Reporting Officer, either online via the QFCC portal or completing a paper form and uploading this via the QFCC website. The reporting stages on the following page outline the Head of Entity's reporting obligations, including required timeframes and the information to be provided to the QFCC.

# Requirements

## A INITIAL REPORT

TIMEFRAME

Notify the QFCC of the report about reportable conduct within **three business days** of the Head of the Entity becoming aware of the reportable allegations or conviction.

INFORMATION REQUIRED

- Details of each reportable allegation or reportable conviction
- The name of the worker, including any former name or alias
- Date of birth of the worker (if known)
- Name of the Head of the Reporting Entity
- Whether the Police or a sector regulator has been notified
- Reporting Entity contact details
- Any action, including risk management action taken if the worker currently performs work for the Entity. (See Risk Management within Section 4A of these procedures)
- Any other information prescribed by regulation

*See sections 34 and 35 of the Child Safe Organisations Act 2024.*

## B INVESTIGATION NOTIFICATION

TIMEFRAME

As soon as practicable after the Head of Entity becoming aware of the report about reportable conduct.

INFORMATION REQUIRED

- Notification to the QFCC that an investigation is being conducted. Note it is the responsibility of the Head of Entity to ensure an investigation is conducted as soon as practicable (see Investigations into Reportable Conduct within Section 4A of these procedures).
- Contact details for a person the QFCC may contact in relation to the investigation, noting the QFCC expects this to be provided without unnecessary delay, once an investigator has been appointed.

*See sections 34 and 35 of the Child Safe Organisations Act 2024.*

## C INTERIM REPORT

TIMEFRAME

Within 30 business days of the Head of Entity becoming aware of the reportable allegations or convictions.

INFORMATION REQUIRED

- The facts and circumstances of the reportable allegation or the reportable conviction (to the extent available).
- Update from the initial report on action taken, including risk management action.
- A copy of the worker's written submissions, if the worker has made them.

*See section 35 of the Child Safe Organisations Act 2024.*

## D FINAL REPORT

TIMEFRAME

Provide a final report that includes the investigation findings as soon as practicable.

INFORMATION REQUIRED

- Information about the facts and circumstances of each reportable allegation or reportable conviction.
- Findings after completing the investigation.
- Reasons for the findings.
- Copies of documents relied on in making the findings.
- Whether the matter has been referred to another entity and associated details.
- Action taken including risk management action if the worker currently performs work for the reporting entity.
- Action taken or proposed to be taken to improve the reporting entity's ability to identify, report and investigate.
- If no action is taken, the reasons why.

*See sections 34 and 35 of the Child Safe Organisations Act 2024.*

## * ADDITIONAL INFORMATION REQUESTS

Following submission of the final report, the QFCC may request further information in relation to the findings or the Reporting Entity's response to those findings.

*See section 35 of the Child Safe Organisations Act 2024.*

REPORTING TOQFCC

# Concerns Relating to an Education and Care Service (ECS)

Education and Care Services (ECS) have specific reporting obligations under Education and Care Services legislation. Where concerns arise relating to the safety, wellbeing or care of children within an ECS, the Approved Provider or delegate is responsible for ensuring required notifications are made to the regulator within the applicable statutory timeframes.

The following requirements outline key notification obligations relevant to child safety concerns and related operational incidents within an ECS.

## Requirements

### 1. REPORTING TO THE REGULATORY AUTHORITY

The Approved Provider or their delegate will ensure concerns are reported to Queensland's Early Childhood Regulatory Authority, the Department of Education, compliant with the relevant notification timeframes, and provide any further information required by the Department.

### 2. NOTIFICATION TIMEFRAMES AND REPORTABLE MATTERS

The following tables provide a summary of potentially relevant reportable matters and associated notification timeframes.

**A**

#### 24 HOUR NOTIFICATIONS

**PHYSICAL OR SEXUAL ABUSE CONCERNS**

Allegations and incidents where it is reasonable for the Approved Provider to believe that physical or sexual abuse has occurred or is occurring, while a child is being educated and cared for by the ECS.

**COMPLAINTS ALLEGING BREACHES OF EDUCATION AND CARE SERVICE LAW**

All complaints alleging that the ECS Law has been contravened. Examples include insufficient supervision, inappropriate discipline, or failure to protect children from harm or hazard.

**SERVICE CLOSURE OR REDUCTION OF ATTENDANCE**

Any incidents requiring closure of the ECS or reduction in child attendance.

**SERIOUS INCIDENTS**

All suspected, actual or alleged serious incidents.
A serious incident may include the death of a child while being cared for by the ECS, or following an incident at the ECS; a serious injury, trauma or illness requiring urgent medical attention or hospital attendance; emergencies attended by emergency services; or circumstances where a child is missing, unaccounted for, removed contrary to Regulations, or mistakenly locked in or out of premises.

**B**

#### 7 DAY NOTIFICATIONS

**RISKS TO CHILD HEALTH, SAFETY OR WELLBEING**
Any circumstances arising at the service that poses a risk to the health, safety or wellbeing of a child attending an ECS.

**WORKER CLEARANCE OR DISCIPLINARY MATTERS**
Suspension or cancellation of a Working with Children Card, teacher registration, or disciplinary proceedings involving a Nominated Supervisor

*Be cautious that a matter relevant to a 7 day notification does not also meet the definition of a matter requiring 24 hour notification.*

# Concerns Relating to an Approved Teacher

Schools and ECS may be required to report concerns relating to approved teachers to the Queensland College of Teachers (QCT). The following requirements outline key reporting obligations relevant to approved teachers.

## Requirements

### 1. REPORTING RESPONSIBILITIES TO THE QUEENSLAND COLLEGE OF TEACHERS

Within schools, the Principal, as the employing authority, has primary responsibility for ensuring matters are reported to the Queensland College of Teachers (QCT) in compliance with sections 76, 77 and 78 of the *Education (Queensland College of Teachers) Act 2006*, and for providing information to QCT as necessary. The Delegate of the Governing Body may support the Principal in meeting this responsibility.

### 2. DEALING WITH ALLEGATIONS

For the purposes of reporting to QCT, dealing with an allegation includes investigating, inquiring into, examining the allegation, or referring the allegation to another entity to deal with.

### 3. DETERMINE REPORTING REQUIREMENTS

Employing authorities, usually Principals, will refer to legislation and QCT practice resources for requirements associated with this reporting.

See external Practice Resources and Templates: Queensland College of Teachers.

### 4. NOTIFICATION TIMEFRAMES AND REPORTABLE MATTERS TO QCT

| REPORTABLE MATTER | TIMEFRAME | AUTHORITY |
|---|---|---|
| Allegation of harm caused, or likely to be caused, to a child because of the conduct of a relevant teacher | As soon as practicable after starting to deal with the allegation | Section 76 *Education (Queensland College of Teachers) Act* 2006 |
| Outcome after the employing authority stops dealing with the allegation | As soon as practicable after the employing authority stops dealing with the allegation | Section 77 *Education (Queensland College of Teachers) Act* 2006 |
| Dismissal of a relevant teacher where circumstances call into question the teacher's competency to be employed as a teacher | Within 14 days of notice of dismissal | Section 78 *Education (Queensland College of Teachers) Act* 2006 |
| All Reportable Conduct reports related to a teacher (e.g. Initial, Interim and Final) | Concurrent with QFCC reporting | As prescribed reportable scheme entities (*Child Safe Orginisations Act* 2024) |

Notifications include the name of the employing authority and prescribed school, the name of the relevant teacher, relevant dates, particulars of the allegation, other relevant information and any actions taken, findings, outcomes and reasons for the outcomes and decisions made.

### 5. CONCERNS RELATING TO TEACHERS WITHIN AN ECS

Within an ECS, where a teacher is subject to Reportable Conduct investigation the Approved Provider will share information with QCT as a prescribed reportable scheme entity (*Child Safe Organisations Act 2024*). In addition to this, where a teacher is dismissed in circumstances that call into question their competency to be employed as a teacher, the Approved Provider or delegate will lodge a complaint with QCT to ensure QCT is aware of the circumstances.

# Concerns Relating to a Registered Health Practitioner

Schools and ECS may be required to report concerns relating to persons registered with the Australian Health Practitioner Regulation Agency (AHPRA). These reporting obligations support the oversight of professional conduct, safety and suitability within regulated health professions.

As part of responding to relevant concerns, Principals (schools) and the Approved Provider or delegate (ECS) will report to AHPRA where appropriate or required, and provide information to AHPRA as necessary. The Delegate of the Governing Body may support the Principal or the Approved Provider in meeting these responsibilities.

See external Practice Resources: AHPRA

# Concerns Relating to Redress for Historical Abuse

Concerns relating to historical abuse may involve requests for support, information or access to redress processes.

For schools owned by the ACSQ, and ECS where the Diocese is the Approved Provider, matters relating to historical abuse and redress are managed by a specialist team within ACSQ to ensure appropriate support, oversight and coordination. People seeking information about redress processes may be connected directly with this team. Contact can be made via redress@anglicanchurchsq.org.au. Further information is available at Seeking Redress — Anglican Church Southern Queensland.

## Requirements

### 1. REPORTING RESPONSIBILITIES

The Principal (schools), the Approved Provider or delegate (ECS), or Delegated Reporting Officer managing the concerns will consider and apply all the reporting responsibilities outlined in Section 4B of these procedures where relevant (e.g. reportable conduct), noting any limitations on the capacity to share information will be applied, and specialist advice sought where appropriate.

### 2. RECORD KEEPING, RISK REDUCTION AND SUPPORT

The Principal (schools), the Approved Provider or delegate (ECS), or the Delegated Reporting Officer managing the concerns will take all reasonable steps related to record keeping, risk reduction, reporting, and support provision.

### 3. SUPPORTING PERSONS SEEKING REDRESS

The Principal (schools), the Approved Provider or delegate (ECS), or Delegated Reporting Officer managing the concerns will ensure relevant and appropriate information is provided to those seeking information about opportunities for redress from historical abuse, such as:

- Thanking them for their contact and recognising the courage this takes.
- Advising them of appropriate next steps available.
- Providing their details to other persons relevant to managing their enquiry.

# Concerns Related to Sexual Abuse or likely Sexual Abuse

## Context

The following requirements apply regardless of the identity of the 'other person' (for example, another child), the timeframe of the concerns (including current or historical concerns), or whether there is information indicating the matter may previously have been reported to Police by another person, such as a parent.

### CRIMINAL CODE

It is a criminal offence in Queensland to fail to report a reasonable belief of sexual abuse of a child (under 16 years at the time of the abuse) by an adult (section 229BC of the *Criminal Coast Act 1899*). However, in certain circumstances it may also be reasonable not to directly report the matter to Police. For example, this may apply where it is reasonable to believe the child is now an adult (18 years or older) and does not want the information reported, or where a report is made by another person under their obligations within either the *Child Protection Act 1999* or, for school staff, the *Education (General Provisions) Act 2006*. For this reason, adult workers who identify relevant concerns are to be informed when a report has been made to Police.

It is also important to note that under section 229BB of the Criminal Code Act 1899, adults in positions of power or responsibility within institutions are required to take reasonable steps to reduce or remove the risk of child sexual offences being committed against children in their care. A failure to take such reasonable steps may constitute a criminal offence. Therefore, in addition to reporting requirements outlined below, where these circumstances apply, it is particularly imperative to also apply the procedures outlined in section 4A Risk Reduction.

## Requirements

### 1. ASSESSMENT

This response is required where it is reasonable to suspect sexual abuse or likely sexual abuse to a child, noting the following:

**A**

#### SEXUAL ABUSE

Sexual abuse includes sexual behaviour involving a relevant person (usually a child) and another person where:

- The other person bribes, coerces, exploits, threatens or is violent toward the relevant person,
- The relevant person has less power than the other person, or
- There is a significant disparity between the relevant person and the other person in intellectual capacity or maturity.

(Consistent with sections 364 of the *Education (General Provisions) Act 2006)*

**B**

#### RELEVANT PERSON (USUALLY A CHILD)

Under the *Education (General Provisions) Act 2006*, schools are required to follow this process where the following definition of relevant person is met:

- A student under 18 attending the school
- A kindergarten aged child registered in a kindergarten learning program at the school
- A person with a disability who, under section 420(2) of the Act, is receiving special education at the school and is not enrolled in the preparatory year.

(Consistent with sections 366 and 366A of the *Education (General Provisions) Act 2006)*

Appropriate Persons will also apply this response to all relevant concerns obtained while operating the school or ECS, with the following exception: where the child is now over 18 years of age and it is reasonable to believe they do not want the information reported, unless it is also reasonable to believe reporting the information to Police is necessary to prevent or lessen a serious threat to a person's life, health or safety. In these circumstances, the identity of the child is not provided in the report to Police. Any requests from Police for identifying information are to be considered on a case-by-case basis, seeking specialist advice where appropriate.

# Requirements

## 2. REPORTING

Where it is assessed as reasonable to suspect sexual abuse or likely sexual abuse of a child, the following action will be taken immediately.

See Practice Resource: Email Template for Sexual Abuse / Likely Sexual Abuse.

### A REPORTING CONCERNS INTERNALLY

Staff are required to immediately provide concerns in writing to the appropriate delegate in a secure manner that protects information and supports accurate record keeping. This may include reporting via school or ECS controlled email accounts connected to secure WiFi and sent only to authorised recipients. However, this requirement must not delay the timely sharing of information or management of concerns. Concerns are therefore usually reported verbally in the first instance.
It is the responsibility of the worker to ensure the concerns have been received by the appropriate delegate. The following reporting pathways identify the appropriate recipients for concerns, including support and alternative reporting arrangements where required.

CHILD SAFE ADVOCATE
May receive concerns to provide support and assistance with reporting obligations.

**APPROPRIATE DELEGATES:**

PRINCIPAL (SCHOOLS)
Primary delegate for receiving reports in schools.

NOMINATED SUPERVISOR (ECS)
Primary delegate for receiving reports in ECS.

ACTING PRINCIPAL / ACTING NOMINATED SUPERVISOR
Where the usual recipient is on leave and acting arrangements formally documented.

APPROVED PROVIDER OR THEIR DELEGATE (ECS)
DELEGATE OF THE GOVERNING BODY (BOTH SCHOOLS AND ECS)
Where the usual recipient is unavailable, cannot be contacted in a timely manner, or where concerns relate to that person.

For each school or ECS, the positions identified as the Head of Entity, Approved Provider (including Approved Provider representative or delegate), Delegated Reporting Officer and Delegate of the Governing Body are detailed in Annexure A of the Child Safe Anglican Education Policy.

### B REPORTING TO POLICE AND CHILD SAFETY SERVICES

The delegate receiving the report — being the Principal (schools), Nominated Supervisor or the Approved Provider (ECS), or Delegate of the Governing Body — **is responsible for immediately providing written reports to Police.**

Where the matter also relates to a reasonable suspicion that a child may be in need of protection, reports must be emailed to both Police (Child Protection Investigation Units) and Child Safety (Regional Intake) Services. See Concerns a Child may be in Need of Protection in Section 4B of these procedures.

Practice Resource: Key Contacts.

All reports to Police require confirmation of receipt by telephone contact with Police.
A record must be made of:

- The conversation
- The name of the officer spoken to
- Any considerations shared

In exceptional circumstances, the delegate may ask another person, such as a Child Safe Advocate, to assist in making the report on their behalf. Where this occurs, the delegate retains responsibility for the reporting and must be copied into the emailed report.

If the Principal is the first person to receive or identify the concern at the school, they must also immediately provide a copy of the report made to Police to the Delegate of the Governing Body.

# Requirements

## 2. REPORTING (CONTINUED)

C

### REPORT CONTENT REQUIREMENTS

Reports are to include, where known or reasonable to obtain, the following information:

- The name of the first staff member (known as the first person) who identified the concern of sexual abuse or likely sexual abuse, as well as the name of the person making the report directly to Police.
- The name and contact details of an appropriate liaison, representing the school or ECS, regarding the report (e.g. Child Safe Advocate).
- The child's name, age and sex/sex descriptor, and details of how to contact the child.
- Details of the basis for the first person becoming aware, or reasonably suspecting the child has been sexually abused or is likely to be sexually abused, by another person.
- The details or the abuse, or the suspected or likely abuse.
- The identity of the person who has or is suspected of causing the abuse, or risk of likely abuse.
- The identity of anyone else who may have information about the abuse or suspected abuse.
- If also reported to Child Safety - the basis on which the reporter has a reasonable suspicion a child may be in need of protection, including:
  - Any further details of harm (suffered, suffering or unacceptable risk of)
  - Details of why it is reasonable to suspect there may not be a parent able or willing to protect the child from harm.

*Consistent with sections 68 and 69 of the Education (General Provisions) Regulations 2017, section 13G of the Child Protection Act 1999 and section 4 of the Child Protection Regulation 2023.*

## 3. NEXT STEPS FOLLOWING REPORTS TO POLICE

A report to Police does not necessarily mean Police will respond or investigate. Appropriate steps must therefore continue to be taken to reduce risk and provide support for the child and, usually, their family.

This work is led by a relevant Child Safe Advocate or, for schools, the Principal's alternative delegate identified in the Child Safe Response Form. Where appropriate, this includes liaising with Police to support an effective response.

The delegate will also ensure adult workers to report child sexual abuse by an adult are informed of the school's report to Police.

# Concerns a Child may be in Need of Protection

## Context

DEFINITION OF CHILD

This reporting only applies to children as an individual under 18 years of age as defined by Section 9 of the *Child Protection Act 1999*.

CHILD IN NEED OF PROTECTION

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 them from the harm. (Consistent with section 10, *Child Protection Act 1999*)

HARM

Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. Harm can be caused by a single act, omission or circumstance; or a series or combination of acts, omissions or circumstances. (Section 9 *Child Protection Act 1999* and Section 7 of the *Education (Queensland College of Teachers Act 2005*)

PARENT

A child's mother, father or another person exercising parental responsibility for the child, other than on a temporary basis. This includes a person who, under Aboriginal tradition or Torres Strait Islander custom, is regarded as a parent of the child. (Consistent with section 11, *Child Protection Act 1999*)

REPORTING TO CHILD SAFETY

Schools and ECS will make a report to Child Safety Services when it is reasonable to suspect a child may be in need of protection, including an unborn child after birth. (Enabled by section 13A, *Child Protection Act 1999*)

MANDATORY REPORTERS

Certain staff are legally required to report to Child Safety when it is reasonable to suspect a child may be in need of protection due to physical or sexual abuse. This is referred to as a reportable suspicion. For schools and ECS, this includes teachers, registered nurses, adult educators, Nominated Supervisors and Approved Providers under the *Education and Care Services National Law*. Only one report is required for the relevant concern, however all mandatory reporters share responsibility for ensuring a report is made.

CHILD PROTECTION GUIDE

The Queensland Government's Child Protection Guide assists professionals to assess concerns about a child's safety, determine whether reporting may be required, identify further information to gather, and support accountable decision making.

## Requirements

### 1. ASSESSMENT

A report to Child Safety is required where information has been assessed to indicate **both**:

> *A child has experienced, is experiencing, or is at unacceptable risk of experiencing significant harm; and*
>
> *The child may not have a parent able and willing to protect them from that harm.*

When considering whether a child has experienced, is experiencing, or is at unacceptable risk of experiencing significant harm, reports to Child Safety must describe the basis for this assessment. This will generally include details of the abuse or neglect that has caused, or contributed to, the harm or unacceptable risk of harm.

When considering whether a child may not have a parent able and willing to protect them, reports must describe the basis for this assessment, including what each parent is doing, or not doing, to protect the child from harm.

## Requirements

### 2. WHERE A REPORT TO CHILD SAFETY SERVICES IS NOT REQUIRED

Where the threshold for reporting to Child Safety Services has not been met, risk reduction, other relevant reporting and support responses will continue to be applied.

### 3. REPORTING TO CHILD SAFETY SERVICES

Where it is reasonable to suspect a child may be in need of protection, a report is to be made to Child Safety Services.

Appropriate Persons will assist Mandatory Reporters in meeting their reporting obligations and, in all circumstances, ensure a report to Child Safety Services is made where it is reasonable to suspect a child may be in need of protection, including an unborn child after their birth.

If a response from Child Safety Services is likely to be required within 24 hours, reports should be made by telephone. This is in addition to the requirement to provide a written report for physical or sexual abuse.

See Practice Resource: Key Contacts

A

#### REPORTING METHOD BY CONCERN TYPE

**PHYSICAL OR SEXUAL ABUSE**
A written report must be made. Mandatory Reporters must either make the report themselves or be informed that a report has been made.

**SEXUAL ABUSE OR LIKELY SEXUAL ABUSE**
Refer to Concerns Related to Sexual Abuse or Likely Sexual Abuse in Section 4B of these procedures and Practice Resource: Email template for sexual abuse/likely sexual abuse.

**PHYSICAL ABUSE**
Complete Child Safety's online reporting form and save a PDF copy with the Child Safe Response Form.

**EMOTIONAL OR PSYCHOLOGICAL ABUSE, OR NEGLECT**
Reports may be made either by telephone or through Child Safety's online reporting form.
Details of telephone reports are to be recorded in the Child Safe Response Form.

B

#### REPORT CONTENT REQUIREMENTS

**CHILD INFORMATION**
The child's name, age and sex descriptor, and details of how to contact the child.

**BASIS FOR SUSPICION**
The basis on which the reporter has a reasonable suspicion a child (or unborn child, after their birth) may be in need of protection, including:

- Details of suspected harm (suffered, suffering or at unacceptable risk of)
- Details of why it is reasonable to suspect there may not be a parent able and willing to protect the child from the harm.

**PERSON SUSPECTED OF CAUSING HARM**
The identity of the person suspected of causing the harm, or risk of harm.

**OTHER RELEVANT PERSONS**
The identity of any other person who may be able to give information about the harm.

## Requirements

### 4. INFORMING RELEVANT STAFF

The person making the report is responsible for ensuring staff who identified relevant concerns are informed that a report has been made to Child Safety.

### 5. NEXT STEPS FOLLOWING REPORTS TO CHILD SAFETY

A report to Child Safety does not necessarily mean Child Safety will respond or investigate. Appropriate steps must therefore continue to be taken to reduce risk and provide support for the child and, usually, their family.

This work is led by a relevant Child Safe Advocate or, for schools, the Principal's alternative delegate identified in the Child Safe Response Form. Where appropriate, this includes liaising with Child Safety Services to support an effective response.

# Concerns Related to Online Abuse

Concerns relating to online abuse may require additional responses to support the safety and wellbeing of children in digital environments. Depending on the nature of the concern, schools and ECS may consider reporting matters to relevant online safety authorities or supporting children and families to access appropriate reporting pathways and protections.

See external Practice Resources:

- ACCCE (Australian Centre to Counter Child Exploitation)
- eSafety Commissioner

## Requirements

### 1. ONLINE REPORTING PATHWAYS

**Where a concern relates to allegations of online abuse, the Appropriate Person will consider whether it is appropriate to:**

Report ACCCE (Australian Centre to Counter Child Exploitation)

Support students and parents to report relevant matters to the eSafety Commissioner, or the relevant online platform

# Emergency or Danger to Persons

Where concerns involve immediate danger, or potential danger, to any person, the safety of children and others is prioritised through timely action and the application of emergency or critical incident management processes. Depending on the nature and urgency of the concern, this may include contact with emergency services or Police to support immediate safety and risk reduction.

## Requirements

### 1. IMMEDIATE DANGER

If concerns relate to immediate danger to persons, then localised emergency/critical incident management processes are to be followed, including relevant contact with emergency services by telephoning '000'.

### 2. DANGER TO PERSONS

If concerns are not immediate but relate to a danger to persons an Appropriate Person may decide to report such concerns to the Police.

A Child Safe Advocate may assist another Appropriate Person in making this report.

See Practice Resources: Key Contacts
See External Practice Resource: Queensland Police

4C

# Assess and Respond:

# Support

# Supporting Impacted Persons

Support is provided to those whom the school or ECS owes a duty of care responsibility to. This is usually children who are enrolled, or were enrolled at the time of the alleged behaviour of concern, and to other relevant persons, such as workers.

Support resources are generally directed towards children and workers who are currently engaged in school or ECS operations, given the current working relationship. Note, this does not limit reasonable support that may be afforded to a former student or other relevant person.

## Requirements

### 1. CONSIDERING SUPPORT NEEDS

Both whenever a school or ECS identifies a concern, and when new information about that concern is obtained, the Appropriate Person will ensure consideration is given to what can be reasonably done to effectively support those impacted.

For children, consider:

- Support focused on physical, emotional, psychological and cultural safety and wellbeing.
- Who can be effective support people at the school or ECS - consider accessibility and pastoral care role, or ability to appropriately develop supportive interaction with the child.
- What can be done to both support the child regarding identified challenges, and regarding areas of strengths they may have.
- Practical, as well as emotional support for the child's wellbeing.

### 2. COMMUNICATION AND CONSULTATION

Throughout the process, consideration will be given to who is appropriate to communicate and consult with, to optimise effectiveness and appropriate oversight of actions to enable effective support.

### 3. SUPPORT PLANNING AND RESOURCES

Support will be relevant to the concerns and targeted at both available internal and external resources. For 'Concerns Related to Schools or ECS Operations', also refer to relevant content in Section 4A of these procedures.

### 4. DOCUMENTATION OF SUPPORT PLANNING

Support planning will be documented in the Child Safe Response Form, or an attached document - see Practice Resources: Assessment Safety and Support Planning Resources for optional template.

4D

# Assess and Respond: Working with Statutory Authorities

Cooperation | Information | Interviews | Investigations

# Working with Statutory Authorities

## Context

Schools, ECS and statutory authorities have a shared responsibility to coordinate decision making and the delivery of services in the best interests of children. When investigating allegations of harm, or risk of harm, to a child, Child Safety Services and Queensland Police who are authorised under the *Child Protection Act 1999* may have contact with a child at a school or ECS without the knowledge of the child's parent. Schools and ECS may also be required to share information with Child Safety Services, Police or other statutory authorities to support their responses, statutory reporting obligations, investigations, safety planning and service provision.

In addition to Child Safety Services and Police, common statutory authorities include the Non-State Schools Accreditation Boards, the Queensland Early Childhood Regulatory Authority (Department of Education), Queensland College of Teachers, and the Queensland Family and Child Commission.

## Requirements

### 1. INTERVIEWS UNDER THE *CHILD PROTECTION ACT 1999*

Before exercising powers to have contact with a child at the school or ECS, Authorised Officers from Child Safety Services or Police are required to notify the Principal or person in charge of the school or ECS. The school or ECS will ensure management of the request has oversight from the Principal or delegate (schools), or Nominated Supervisor or the Approved Provider or their delegate (ECS). This includes:

- Confirming the identity of Authorised Officers through sighting Child Safety or Police photo identification, with the Officer's name and contact details recorded, including obtaining a business card where available.
- Offering an appropriate support person from the school/ECS to be present during contact with the child, noting the Authorised Officer or child may decline this offer.
- Maintaining accurate records of the notification and contact with the child within, or attached to, the Child Safe Response Form.
- Understanding it is the responsibility of the Authorised Officer to inform the child's parent or guardian of the contact. Schools and ECS must not undertake this role, as doing so may negatively impact Child Safety Services or Police investigations.

### 2. INFORMATION SHARING WITH CHILD SAFETY OR POLICE

Information sharing may occur where it is relevant to assessing or responding to a child's need for protection, supporting a child's health, education or care needs, planning services for a child or family, or where necessary for the prevention, detection, investigation or prosecution of a criminal offence or breach of law.

The school or ECS will ensure management of information sharing requests has oversight from the Principal or delegate (schools), or Nominated Supervisor or the Approved Provider or their delegate (ECS). This inlcudes:

- Undertaking due diligence to confirm the identity of Officers through Child Safety Services or Police identification, or other appropriate means, with the Officer's name and contact details recorded.
- Maintaining accurate records of the request and information provided, noting information may include both fact and opinion.
- Understanding the school or ECS must not inform the child or their parent or guardian of the request without Child Safety Services or Police permission.

If concerned about any aspect of the request, contact the ASC for support or other specialist advice.

## Requirements

### 3. ENGAGEMENT AND INFORMATION SHARING WITH OTHER STATUTORY AUTHORITIES

In relevant circumstances, information will also be shared with other relevant statutory authorities.

The school or ECS will ensure management of this activity has oversight from the Principal (schools), the Approved Provider (ECS), or the Delegated Reporting Officer. This will include due diligence on the appropriateness of actions taken, record keeping, consultation with the Delegate of the Governing Body, and seeking any necessary advice through the ASC, or other specialist advisors.

4E

# Assess and Respond:
# Next Steps

# Next Steps

At the conclusion of responding to a concern, schools and ECS will determine whether ongoing actions can continue through standard operations (Business as Usual) supports, or whether additional monitoring is required to support the ongoing safety and wellbeing of children. 'Business as Usual' responses may include, for example: existing wellbeing or pastoral care supports, inclusion support, behaviour or performance management, or complaints processes.

Where ongoing monitoring is assessed as a reasonable and necessary step to support a child or children currently enrolled in the school or ECS, this will continue as part of the ongoing management of the matter.

## Requirements

### 1. DETERMINING NEXT STEPS

At the conclusion of managing a concern, an Appropriate Person, or other delegate of the Principal identified in the Child Safe Response Form, will determine whether ongoing actions are to continue through 'Business as Usual' service responses or whether ongoing monitoring is also required.

Ongoing monitoring is required where it is assessed as a reasonable and necessary step to support the safety or wellbeing needs of a child or children currently enrolled in the school or ECS.

### 2. RECORDING AND ALLOCATION OF MONITORING RESPONSIBILITIES

Where ongoing monitoring is required, this will be documented within the Child Safe Response Form, including the allocation of responsibility to an identified staff member.

See Section 5: Monitoring

5

# Monitoring

Support | Record | Oversight | Review

# Monitoring

## Context

Ongoing monitoring may be required following the response to a concern. Monitoring is focused on the ongoing safety and wellbeing needs of children currently enrolled in the school or ECS. Monitoring assists schools and ECS to assess the effectiveness of planned actions and whether further action or support remains necessary over time.

## Requirements

### 1. ONGOING MONITORING

Ongoing monitoring is required where it is assessed as a reasonable and necessary step to support the safety and wellbeing needs of a child or children currently enrolled in the school or ECS after the concern has been responded to and a Child Safe Response Form completed.

The staff member responsible for monitoring, along with initial monitoring timeframes, will be documented within the Child Safe Response Form.

### 2. REVIEW OF MONITORING ARRANGEMENTS

The need for ongoing monitoring will be reviewed over time. Review timeframes will reflect the circumstances and needs of those involved in the matter, and the staff member responsible for monitoring will revisit these timeframes where circumstances change.

### 3. MONITORING DECISIONS

At each review point, a decision will be made and recorded regarding whether ongoing monitoring remains a necessary addition to the continuation of 'Business as Usual' operations within the school or ECS.

### 4. DOCUMENTATION MONITORING

Monitoring will be documented within school or ECS records.

See Practice Resource: Monitoring and Review Tool Template (optional)

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# Complaints Management

Receive | Assess | Resolve | Review

# Complaints Management

## Context

Complaints management processes support schools and ECS to respond appropriately where concerns are raised about operations, conduct or compliance with these procedures. Where a complaint relates to an actual, perceived or potential concern, both complaints management processes and these Procedures: Child Safe Responses apply.

Complaints may also relate to allegations of non-compliance with these procedures, including concerns that workers or the school or ECS have not met their child safe responsibilities. Complaints are managed in accordance with applicable governance and complaints management processes to support fair, timely and accountable responses

## Requirements

### 1. CONNECTION TO COMPLAINTS MANAGEMENT PROCESSES

The person responsible for managing a complaint, as identified in the relevant complaints management policy or procedure, is also responsible for ensuring that where it is reasonable to identify a child safety concern, these Procedures: Child Safe Responses are applied in addition to relevant complaints management processes.

As a reminder, a concern is a reasonable suspicion that a child has been harmed, or placed at risk of harm, due to the behaviour of another person and the resulting or potential impact on the child's physical, emotional, psychological or cultural safety.

# Requirements

## 2. COMPLAINTS REGARDING NON-COMPLIANCE

### A LODGING A COMPLAINT

With reference to Annexure B of the Child Safe Anglican Education Policy, complaints of non-compliance with these procedures are to be submitted in writing to the appropriate delegate.

For schools or ECS where the ACSQ is the Governing Body or Approved Provider, or where the school or ECS is identified as ACSQ controlled, complaints are to be submitted to the Executive Director, Anglican Schools Commission.

For all other schools or ECS, complaints are to be submitted to the chair of the school's Governing Body (Board) or ECS Management Committee.

### B MANAGAMENT OF COMPLAINTS

To facilitate the management of the complaint, the relevant delegate (the Executive Director or Chair) will:

- Ensure communication about the complaints management process, including appropriate contact details, are published on the ASC website (for the Executive Director) or the School or ECS website (for the Chair).
- Receive complaints in writing (including electronically), offering, if needed, appropriate support for these complaints to be put in writing.
- Request that complainants, or their authorised representatives, provide the following information:
  - Complaint Information
  - Complainant's personal details
  - Who should be contacted regarding the complaint and their preferred contact details, e.g. the complainant or their authorised representative
  - Any special assistance or support needed by the complainant to properly interact about the complaint
  - Whether the issue has been raised previously and any response, e.g. from the school Principal, ECS Nominated Supervisor or delegate of the Approved Provider
  - Details of and reasons for the complaint
  - Details of outcomes sought.

### C ACKNOWLEDGEMENT AND CLARIFICATION

The Executive Director or Chair will acknowledge the complaint, using the preferred contact details of the complainant or their representative, in a timely manner and in keeping with any legislative requirements. This is aimed to be within three business days of receipt of the complaint.

Where necessary, the Executive Director or Chair will clarify aspects of the complaint, including whether it was intended to be handled as a complaint or as feedback or expression of general concern.

The Executive Director or Chair will also seek to engage regarding identified assistance or support needs, especially related to the ability to provide necessary information to inform the complaint's management.

# Requirements

## 2. COMPLAINTS REGARDING NON-COMPLIANCE (CONTINUED)

D

### ASSESSMENT AND MANAGEMENT OF COMPLAINTS

The Executive Director or Chair will review the complaint and, at their discretion, seek assistance of internal and external resources to undertake the following:

- Application of any applicable requirements within these procedures (Child Safe Responses).
- Undertake an assessment of the concerns to decide how the complaint will be handled, with what priority and resources. This will likely include contact with school or ECS representatives and gathering information from these sources. This assessment will be undertaken with reference to any required methods for handling complaints and complaints analysis detailed in relevant complaints management policy documents that apply to the school or ECS.
- Inform the complainant, or their authorised representative, of:
  - Confirmation of the intention to manage their complaint.
  - The intended method for handling the complaint.
  - The likely or intended process to be followed.
- Arrange for the complaints handling method to be applied.
- Provide updates and outcomes as appropriate.
- Ensure complaint information is recorded in the school or ECS complaints management register.
- Provide information on the complaint's management to be included in relevant review processes.

## 3. APPEALS

For schools or ECS within the ACSQ catchment, a person dissatisfied with the management of a complaint may appeal to the Archbishop of the Diocese of Brisbane (ACSQ).

For other Queensland Anglican schools or ECS, appeals may be made to the relevant Bishop. Appeal processes are published by the relevant Diocese.

7

# Glossary

Key Terms | Child Safe Concepts | Legislative Definitions

# Glossary

**ABUSE** An action that causes harm to a child or places the child at an unacceptable risk of harm. Abuse is usually categorised into physical, sexual (including grooming) or psychological abuse.

*Note: sexual abuse is defined in the Education (General Provisions) Act 2006 as detailed within this glossary.*

**ALL PERSONS** People who have contact with, or information about, a child due to the child's attendance or enrolment at an Anglican school or ECS. This includes, but may not be limited to, other children, visitors and people referred to within this policy and the associated procedures as 'workers' (see definition below).

**ANGLICAN SCHOOLS AND ECS** Those schools and ECS described in Annexure B of the Child Safe Anglican Education Policy, inclusive of any business or group operated under the authority or control of the respective school or ECS. Also referred to as schools/ECS.

**APPROPRIATE PERSONS** A Child Safe Advocate including a Nominated Supervisor (ECS), a Principal (schools), Approved Provider or delegate of the Approved Provider (ECS), Delegate of the Governing Body, Delegated Reporting Officer or any Head of Entity. These staff are identified in each school or ECS Annexure to these procedures.

**APPROVED PROVIDER** The holder of provider approval under Part 2 of the *Education and Care Service National Law* who is responsible for the management and operations of an ECS. Where the Approved Provider is represented by a person or position, this is described in Annexure A of the Child Safe Anglican Education Policy.

**APPROVED TEACHER** A person approved by the Queensland College of Teachers (QCT) to undertake the duties of a teacher in a state or non-state school in Queensland. Approved teachers include registered teachers and persons approved to teach under Permission to Teach (PTT)

**BUSINESS AS USUAL (BAU)** Refers to the usual service provision provided by the school or ECS. BAU may include, for example, existing pastoral care or wellbeing supports, inclusion support, behaviour or performance management, or complaints processes.

**CHILD** An individual under 18 years old, and, unless explicitly stated, the term 'child' also includes young people who are enrolled or attending in an Anglican school (i.e. may have turned 18 years old).

**CHILD IN NEED OF PROTECTION** 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 who is able and willing to protect them from the harm (consistent with section 10 of the *Child Protection Act 1999)*.

**CHILD SAFE ADVOCATE** Staff who have additional responsibilities for supporting the application of the Procedures: Child Safe Responses within their respective school or ECS. This includes being a contact person and support for children, families, workers, visitors and community members when they are concerned for a child's safety or wellbeing, or the conduct of any person associated with their school or ECS that may be considered inappropriate conduct, child abuse or neglect.

**CHILD SAFE RESPONSE FORM** Records the school or ECS management of the concern, along with related decision making and actions. The ASC publishes a template. The template may be integrated into the school or ECS record keeping systems.

**CLERGY AND LICENSED PERSONS** A person holding the Archbishop's license to any special charge or cure or to the performance of any spiritual duty or service within the Diocese. Note, for other Queensland Dioceses (outside of ACSQ) this would be a Bishop's licence.

**CONCERN**

A 'concern' is information where it is reasonable to suspect a child has been harmed, or placed at risk of harm, due to the behaviour of another person and the resulting or potential impact on a child's physical, emotional, psychological or cultural safety.

Concerns typically fall into one of these groups:

- Concern for a child related to the behaviour (action or inaction) of a parent or caregiver (usually unrelated to the school or ECS).
- Concern arising from peer interactions, where children are known to each other through their relationship with the school or ECS.
- Concern arising from the conduct of a worker, or other adult who is reasonably suspected to have had or will have contact with a child through their relationship with the school or ECS. This includes any conduct considered inappropriate, reportable allegation or conviction and is not limited to conduct in the course of work.
- Concern for a child related to the behaviour of another person not covered above – where their identity is known or unknown. For example, an online identity or a person who the child has come into contact within the broader community.

**DELEGATE OF THE GOVERNING BODY**

A person delegated by the governing body of the school or ECS (e.g. the Board of the corporation operating the school, inclusive of Diocesan Council) to undertake duties as described within Annexure A of the Child Safe Anglican Education Policy.

**DELEGATED REPORTING OFFICER**

The person or position able to receive reportable allegations and information about reportable convictions regarding a Head of Entity.

**FORMER WORKER**

A person who has previously performed work for a Reporting Entity. Refer to definition of workers and Reporting Entity.

**HARM**

Harm is generally defined as "damage to the health, safety, or wellbeing of a child. It can be the result of abuse or neglect by an adult or the conduct of other children. It includes: physical violence; sexual abuse, grooming and sexual misconduct; emotional and psychological harm; and neglect."
*Source: Guidelines for implementing the Child Safe Standards in Queensland, Queensland Family and Child Commission, 2025*

In some cases, harm may be of a sufficient threshold to also enliven reporting or other obligations under legislation. These obligations are often distinct and unique but generally share a common definition of what harm is.

"Harm, to a child, is any detrimental effect of a significant nature on the child's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. Harm can be caused by a single act, omission, or circumstance; or a series or combination of acts, omissions or circumstances."
*Source: Section 9 Child Protection Act 1999 and Section 7 of the Education (Queensland College of Teachers) Act 2005.*

**HEAD OF ENTITY**

The person or position with responsibility for the Child Safe Entity or Reporting Entity to meet their obligations under the *Child Safe Organisations Act 2024*.
*Consistent with section 7 of the Child Safe Organisations Act 2024.*

This person or position is identified in Annexure A of the Child Safe Anglican Education Policy.

**NEGLECT**

The failure to take action that would prevent harm, or an unacceptable risk of harm to a child.

**NOMINATED SUPERVISOR**

This title applies to an individual in an ECS who:

- Is nominated by the Approved Provider to be a Nominated Supervisor of that ECS, and
- Unless the individual is the Approved Provider, has provided written consent to that nomination.
  Source: Education and Care Services National Law (Queensland)

**PARENT** The child's mother, father or someone else having or exercising parental responsibility for the child, other than on a temporary basis (consistent with section 11 of the *Child Protection Act 1999*).

**PRINCIPAL** This title applies to an individual in a school who is the person responsible for the school's day-to-day management.
*Source: Education (General Provisions) Act 2006*

At some schools, alternative titles are used, such as Headmaster.

**REGISTERED HEALTH PRACTITIONER** A health practitioner registered with the Australian Health Practitioner Regulating Agency. Examples of professions include nursing, occupational therapy, psychologists and speech pathologists.

**REPORTABLE ALLEGATION** Allegations or other information that leads a person to form a reasonable belief that a worker of a Reporting Entity has committed reportable conduct, or misconduct that may be reportable conduct (consistent with section 27 of the *Child Safe Organisations Act 2024*).

**REPORTABLE CONDUCT** Reportable conduct includes:

- A child sexual offence
- Sexual misconduct committed in relation to, or in the presence of a child
- Ill-treatment of a child
- Significant neglect of a child
- Physical violence committed in relation to, or in the presence of a child
- Behaviour that causes significant emotional or psychological harm to a child
  Consistent with Section 26 *Child Safe Organisations Act 2024*.

Reportable conduct may be one act or a series of acts or incidents. It is irrelevant if the conduct occurred whilst the worker was performing work for the Reporting Entity (e.g. the worker may be off duty, in their own home).

Reportable conduct may apply to former workers where the alleged conduct occurred, or where the worker was convicted, during the period the worker was engaged by the Entity.

Reportable conduct does not include conduct that is reasonable for the discipline, management or care of a child having regard to the characteristics of the child, including the age, developmental stage and health of the child; and any code of conduct or professional standard applying to that conduct.

**REPORTABLE CONDUCT SCHEME** The Reportable Conduct Scheme requires Reporting Entities to identify, report and investigate allegations or convictions of child abuse or child-related misconduct made about their workers to the Queensland Family and Child Commission.

**REPORTABLE CONVICTION** A conviction of an offence committed by a worker against a law of a state or the Commonwealth that may involve reportable conduct (consistent with section 28 of the *Child Safe Organisations Act 2024*).

**REPORTING ENTITY** Defined by section 29 and Schedule 2 of the *Child Safe Organisations Act 2024.* In addition to education services, and early childhood education and care services, the following Entities most commonly operated within a school or ECS are accommodation or residential services (including home stay and boarding), health services and religious bodies.

**SAFETY** Safety is the protection from harm. Broad definitions for safety include:

- PHYSICAL SAFETY
  No unreasonable, or reasonably foreseeable, risk of harm to physical development or physical health.
- EMOTIONAL AND PSYCHOLGICAL SAFETY
  No unreasonable, or reasonably foreseeable, risk of harm to emotional or psychological development (e.g. cognitive, sexual and social development), wellbeing, mental health or psychosocial safety.
- CULTURAL SAFETY
  To feel welcome, safe, valued, included and respected.
  Source: Unpacking the Universal Principle – Cultural Safety in the Child Safe Standards | Queensland Family and Child Commission

**SEXUAL ABUSE, INCLUDING GROOMING**

Sexual behaviour involving the relevant person (usually a child) and another person where:

- The other person bribes, coerces, exploits, threatens or is violent toward the relevant person;
- The relevant person has less power than the other person; OR
- There is a significant disparity between the relevant person and the other person in intellectual capacity or maturity.

(Consistent with section 364 of the *Education (General Provisions) Act 2006)*

Sexual abuse includes but is not limited to grooming. Grooming is conduct in relation to a child or a person who has care of a child, with the intent to facilitate the procurement of a child to engage in a sexual act, or expose, without legitimate reason, the child to any indecent matter.
(Consistent with section 218B of *The Criminal Code)*

**STATUTORY AUTHORITY**

An entity established under an Act and which includes, or whose governing body includes, at least one member who is appointed under an Act, by a Minister, or by the Governor in Council (Source: Queensland Government).

Examples include the Queensland Family and Child Commission (QFCC), the Non-State Schools Accreditation Board (NSSAB), Department of Education as the Early Childhood Regulatory Authority, Child Safety Services, Blue Card Services, the Queensland College of Teachers (QCT), and the Australian Health Practitioner Regulation Agency (AHPRA).

**TRAUMA INFORMED APPROACHES**

Trauma-informed approaches emphasise understanding the impact of past and present experiences on a person's physiological, psychological and psychosocial responses to current circumstances.

**WORKER**

Worker is an inclusive term for any person who performs work of any kind within, or on behalf of, an Anglican school or ECS, including any other business or group under the authority or control of the respective school or ECS. Workers include employees in all capacities, volunteers, contractors, subcontractors, consultants, labour-hire workers, trainees and work experience employees, and religious leaders.

(Consistent with section 8 of the *Child Safe Organisations Act 2024)*

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# Practice Resources

Templates | Forms | Guides | Forms



# Practice Resources

The following Practice Resources support the implementation of the Child Safe Anglican Education Policy and associated procedures. These resources are intended to assist schools and Education and Care Services (ECS) to apply the requirements of the policy and procedures in practice through templates, tools, guidance materials, training resources and examples.

Resources are maintained within the ASC's Sharepoint and may be updated from time to time. Additional resources may be developed or updated over time. Schools and ECS should regularly refer to the online Practice Resources folder to ensure they are using the most current versions of all documents, templates and guidance materials. Users should always access the current version via the online resource folder.

Access Practice Resources here.

## CHILD SAFE RESPONSE RESOURCES

*Resources supporting the identification, assessment, response, reporting, support, monitoring and review of child safety concerns.*

- Child Safe Response Form
- Reporting Sexual Abuse Email Template
- Key Contacts – ASC, Police and Child Safety
- Annexure: Child Safe Advocates and Other Appropriate Persons

## ASSESSMENT, SAFETY AND SUPPORT PLANNING RESOURCES

*Resources supporting risk assessment, safety planning and support planning during child safe responses.*

- Basic Risk Assessment
- Reportable Risk Assessment Template
- Detailed Assessment of Risk
- Immediate Needs Assessment and Safety Plan
- Safety and Support Plan
- Monitoring and Review Tool

## INTERNAL REVIEW RESOURCES

*Resources supporting internal reviews of Child Safe Responses and related reporting requirements.*

- Internal Review Checklist
- Internal Review Register
- Internal Review Report Template

## REFERENCE DOCUMENTS

*Reference materials that support understanding and implementation of the child safe framework.*

- Child Safe Anglican Education Policy
- Procedures: Child Safe Responses
- Procedures: Child Safe Operations
- Compliance Support Index

## ASC REPORTABLE CONDUCT TEMPLATES

*Resources supporting the assessment, investigation and documentation of reportable conduct matters.*

- Risk Assessment
- Investigation Plan
- Interview Plans (children, adult witnesses and workers subject to allegations)
- Evidence Matrix
- Investigation Report

## CHILD SAFE ACTION PLAN RESOURCES

*Resources supporting the development, implementation, monitoring and review of Child Safe Action Plans.*

- Child Safe Action Plan – Operations Plan Template
- Child Safe Action Plan – Improvements Plan Template
- Child Safe Action Plan Monitoring Tool

## GOVERNANCE AND COMMITTEE RESOURCES

*Resources supporting Child Safe Committees and local governance arrangements.*

- Child Safe Committee Report Template
- Child Safe Committee Terms of Reference Template
- Delegations Approval Template

## HUMAN RESOURCE MANAGEMENT RESOURCES

*Resources supporting screening, recruitment and workforce management requirements.*

- Child Safe HRM Screening Guidance

## TRAINING AND INDUCTION RESOURCES

*Resources supporting child safety induction, training and staff capability development.*

- Child Safety Induction Overview
- Example Induction Resources
- Annual Child Safe Processes Training

## CHILD FRIENDLY RESOURCES

*Resources supporting child friendly communication.*

- Your Safety
- Talk to a Grownup/Adult
- Child Safe Advocates
- Child Safe Process
- Student Diary/Portal content
- Example Content for Parent Communication
- Teaching Notes and Resources


Anglican
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# CHILD SAFE ADVOCATES AND OTHER APPROPRIATE PERSONS

Annexure to Procedures: Child Safe Responses

St Andrew's Anglican College and Little Saints Early Learning Centre is committed to providing a child-safe environment where children and young people feel safe, respected, and heard. The College and Service has adopted the Child Safe Anglican Education Policy and the associated Procedures: Child Safe Responses and Child Safe Operations, as published by the Anglican Schools Commission.

**Raising Child Safety Concerns**

*Where there is a potential, perceived, or actual concern:*

- *about the safety or wellbeing of a child or young person; or*
- *about the conduct or behaviour of any person associated with the School*

*children, young people, parents, carers, and community members are encouraged – and all workers, such as staff, volunteers and contractors must – share this information as soon as practicable with an Appropriate Person.*

An Appropriate Person may include a Child Safe Advocate, the Principal or, depending on the circumstances, other authorised delegates under the Child Safe Anglican Education Procedures (as outlined below).

Please refer to the Procedures: Child Safe Responses for further information.

## CHILD SAFE ADVOCATES

Child Safe Advocates are trained staff members who support the College and Service's child safe responses. Their role includes:

- being a trusted contact for children who are worried about their own safety or the safety of another child;
- supporting parents, carers, workers and community members to raise child safety concerns; and
- assisting the School to respond appropriately and in line with legislative and procedural requirements.

| Name and position | Contact Details | Focus Area |
|---|---|---|
| Ms Cath Green | cgreen@saac.qld.edu.au | Primary |
| Mr Sam Ellis | sellis@saac.qld.edu.au | Primary |
| Mr Tim Ricketts | tricketts@saac.qld.edu.au | Secondary |
| Ms Lauren Norbury | lnorbury@saac.qld.edu.au | Secondary |
| Mrs Anita Close | aclose@saac.qld.edu.au | Secondary |
| Mr Craig Harkiss | charkiss@saac.qld.edu.au | Whole College |
| Mr Joel Williams | Jwilliams2@saac.qld.edu.au | Indigenous Liaison |
| Mr Rohan Hardy | rhardy@saac.qld.edu.au | Music |
| Mr Steve Robson | srobson@saac.qld.edu.au | Sport |
| Mr Brad Hillier | bhillier@saac.qld.edu.au | Aquatic Centre |
| Mrs Trudiann Mashall | tmarshall@saac.qld.edu.au | Little Saints |
| Ms Sarah Geyer | sgeyer@saac.qld.edu.au | Little Saints |

## SCHOOL PRINCIPAL (SCHOOL HEAD OF ENTITY)[1]

| Name | Contact details |
|---|---|
| Ms Karen Gorrie | reportableconduct@saac.qld.edu.au |

## OTHER APPROPRIATE PERSONS

| Role | Position[2] | Contact details |
|---|---|---|
| Approved Provider's Representative (Head of Entity for the ECS) and (where applicable) their delegate for Little Saints Early Learning Centre. | • **Executive Director**, Anglican Schools Commission<br>• **Delegate: Manager, Early Years**, Anglican Schools Commission | • Email: acs@anglicanchurchsq.org.au<br>• Phone: 3835 2288 |
| Delegated Reporting Officer to receive reportable allegations or information about reportable convictions regarding the Principal as Head of Entity. | • **Director of Child Safety**, Anglican Schools Commission<br>• **Executive Director**, Anglican Schools Commission | • Email: reportable conduct@ascqld.org.au<br>• Phone: 3835 2288 |
| Delegate of the Governing Body:<br>• To receive and report sexual abuse or likely sexual abuse to Police (when the Principal or Approved Provider is unavailable)<br>• To receive concerns from an Appropriate Person (usually the Principal or Approved Provider) relating to the operations of the school/ECS. | • **Director of Child Safety**, Anglican Schools Commission<br>• **Executive Director**, Anglican Schools Commission | • Email: acs@anglicanchurchsq.org.au<br>• Phone: 3835 2288 |
| Delegate of the Governing Body to receive complaints of non-compliance with the Procedures: Child Safe Responses | • **Executive Director**, Anglican Schools Commission | • Email: acs@anglicanchurchsq.org.au<br>• Phone: 3835 2288 |

1 and 2 Note: If the person is on leave, a person who is Acting may perform this role.